

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC21084404
PROSECUTOR NO. :	095467652
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
ROY J PULS	)	
2019 E 82nd Terr.	)	CASE NO. 2116-CR
Kansas City, MO 64132	)	DIVISION
DOB: 06/10/1995	)	
Race/Sex: W/M	)	
	)	
DEFENDANT.	)	

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 13, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Corey A Haley caused the death of Corey A Haley by shooting him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

Count II. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the **felony of armed criminal action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about December 13, 2021, in the County of Jackson, State

State vs. Roy J Puls

of Missouri, the defendant committed the felony of murder in the second degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeannette Wolpink
Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-1776
jwolpink@jacksongov.org

State vs. Roy J Puls

WITNESSES:

1. [REDACTED] St, Floor 11, Kansas City, MO 64106
2. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
3. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
4. DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106
5. Corey A Haley, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
7. [REDACTED] E 12th St, Floor 11, Kansas City, MO 64106
8. DET James H. Price, 1125 Locust, Kansas City, MO 64106
9. [REDACTED] 415 E 12th St, Floor 11, Kansas City, MO 64106
10. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
11. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
12. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
13. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 12-13-2021

CRN: 21-084404

I, Detective Bonita Cannon, #4585, Kansas City Missouri Police Department
(Name and identify law enforcement officer, or person having information as probable cause.)

knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 12-13-2021, at 2019 E. 82nd Terrace in
(Date) (Address)

Kansas City, Jackson Missouri Roy Justin Puls
(County) (Name of Offender(s))

W/M DOB 06-10-1995 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 12-13-2021 at 0018 hours officers of the Kansas City Missouri Police Department were dispatched to 2000 E. 82nd Street on a reported shooting. It was determined the address was actually 2019 E. 82nd Terrace, located in Jackson County, Missouri.

Upon their arrival to the 82nd Terrace address they were informed the victim was transported via private vehicle to Research Medical Center, 2316 Meyer Boulevard.

The victim was eventually pronounced deceased. His death was ruled a homicide by the Jackson County Medical Examiner, as a result of gunshot wounds to his face, neck, chest and back.

■ stated she and Puls are roommates. The victim was staying there temporarily. She further stated the victim was verbally arguing with everyone that lived there as well as those that were visiting. She stated Puls was annoyed with the victim and was leaving with a black duffel bag. The victim followed Puls out of the residence.

■ stated after both the victim and Puls went outside she heard the sounds of gunshots. She responded to the front door where she observed a white heavy duty truck speeding away and the victim walking into the residence uttering, "I've been shot and I can't breathe." She stated the victim was holding his face.

Video surveillance was recovered-

At 00:13:14 a light colored or white truck with spotlights along the top edge of the vehicle arrived from the east and parked in front of the address (2019 E. 82nd Terrace). The driver (determined to be Puls, exits the vehicle and goes inside of the residence. He leaves the driver door of the truck open and the lights (including the spot light on).

PROBABLE CAUSE STATEMENT FORM

CRN 21-084404

At 00:13:54 Puls exits the residence carrying a bag, to which he puts in the rear driver side of the vehicle, before going back into the residence. Puls exits the residence a second time carrying what appeared to be a bag, followed by the victim.

At 00:14:16 as the victim raises his left hand a muzzle flash from where Puls was standing is seen as the victim falls to the ground clutching his chest. Puls get back into the truck leaving westbound on 82nd Terrace.

A black Iphone (broken screen) in a black Otter Box style case was recovered from the scene. It was determined to belong to Puls. Detectives obtained a search warrant for that particular cell phone.

On 12-17-2021 detectives interviewed Puls mother, Michelle Puls. She stated her son (Justin Puls) contacted her either Monday (12-13-2021) or Tuesday (12-14-2021) and told her he loved her. She stated Puls also told her "it was self-defense because Corey was coming after him and he was scared. Michelle Puls stated she hasn't heard from her son since then. Michelle Puls wouldn't elaborate any further.

On 12-19-2021 ■■■ stated he went to the address (2019 E. 82nd Terrace) approximately 40 minutes before the shooting. When he got there Puls was there putting some fencing in the back of a white, what he believed to be, a Ford truck. At some point Puls left. He stated another male was in the driver seat helping Puls.

■■■ stated shortly after Puls left the victim arrived. Peterson didn't want to let him in because he causes drama, however she did so. ■■■ stated the victim started a verbal argument with a male he only knows as "Rob." He stated the victim was calling "Rob" gay. After a near physical altercation between "Rob" and the victim, "Rob" and his girlfriend "GiGi" left the residence.

■■■ stated at some point Justin arrives. He walks into the residence and leaves with tools. The victim follows Justin out of the house. He hears the victim's voice getting loud followed by two or three pops. The victim comes back into the house asking someone to call 911. ■■■ stated Peterson was the only with a cell phone but didn't seem to be calling 911.

■■■ stated he and the victim left the residence. He ran to find the victim's father to tell him that his son had been shot, and the victim went across the street to a neighbor's residence.

During this investigation information was received that Puls is communicating via Facebook with various persons. The Facebook user profile <https://www.facebook.com/profile.php?id=100071022739638> was provided as being Justin Puls Facebook account.

A black Iphone (broken screen) in a black Otter Box style case was recovered from the scene. It was determined to belong to Puls cell phone per Illegal Firearms Squad who obtained an Affidavit for a Historical Data Pull granted by Judge Agnelly. During the time they pinged the cell phone it pinged in the area of 13th and Oak (while the cell phone was stored at Police Headquarters). A detective from their unit responded to Police Headquarters, 1125 Locust and determined the cell phone recovered from scene (outside on the ground near the street belonged to Puls. The cell phone number 816-209-9936 responds back as belonging to Puls from various sources.

PROBABLE CAUSE STATEMENT FORM

CRN 21-084404

The case Detective is requesting an arrest warrant in lieu of a summons for the listed offender as the circumstances of the crime was violent in nature. Puls has had prior contacts with law enforcement Officers and is currently on Probation for Knowingly Burning and Exploding and Tampering with a Motor Vehicle. In light of the recent incident and his recent conduct the case Detective believes the offender is a danger to himself and the public.

Printed Name Det. Bonita Cannon, #4585 Signature /s/Det. Bonita Cannon, #4585

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.