

PROBABLE CAUSE STATEMENT FORM

Date: 07-27-2022

CRN: KC22044520

I, Det. Tom Hammond #4775
(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 07-04-2022, at 8925 Longview in
(Date) (Address)

Kansas City, Jackson Missouri Jairo Daniel Garcia Perez
(County) (Name of Offender(s))

w/m, 12-12-1997 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07-04-2022, at 1756 hours, Kansas City Missouri Police Officers were dispatched to 8925 Longview Rd, Kansas City, Jackson County, Missouri in regard to a party down. Upon arrival officers observed the victim, a 30 year old Hispanic male, with injuries to his right arm, chest and head. The victim was transported to a local hospital where he later died from his injuries.

The witness () was contacted who advised he observed a white van drive by 3-4 times and the victim and 2-3 unknown males exited the van. stated the victim and the suspect, Jairo Daniel Garcia Perez, had issues with each other and told his son to get in the truck because trouble was starting. stated he and his son left the scene and then heard gunshots.

The witness () was contacted who advised the victim and Garcia Perez, have had issues in the past and did not get along. stated the victim arrived to the location and the victim and Perez began to argue. stated he observed the victim strike Perez with his fist. observed Perez with a hand gun and shoot the victim multiple times. Perez fled the scene. The victim, Perez and multiple witnesses have all worked together in the past and/or currently live together. knew Perez on site and provided a phone number of 430-202-7110 as belonging to Perez.

Detectives and Crime Scene Technicians recovered eleven (11) 9mm shell casings from the scene.

On 07-26-2022, Garcia Perez, was arrested and transported to Police Headquarters for questioning. Garcia Perez waived his Miranda Rights and admitted to shooting the victim. Garcia Perez stated he used a 9mm pistol and had thrown it along the road as he left the scene on foot.

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Printed Name Det. Tom Hammond #4775 Signature /s/ Det. Tom Hammond #4775

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

Judge

Circuit Court of _____ County, State of Missouri.

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

POLICE NO. :	KC22044520
PROSECUTOR NO. :	095470624
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JAIRO GARCIA-PEREZ)	
3004 Quincy)	CASE NO. 2216-CR
Kansas City, MO 64128)	DIVISION
DOB: 12/12/1997)	
Race/Sex: W/M)	
<div style="background-color:black; width:100px; height:15px;"></div>)	
)	
)	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 July 4, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Carlos Martinez-Ramirez caused the death of Carlos Martinez-Ramirez 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 July 4, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant

State vs. Jairo Garcia-Perez

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/ Lauren Whiston
Lauren Whiston (#66185)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Fl
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WITNESSES:

1. [REDACTED]
City, MO 64106
2. DET Mario Florido, 1125 Locust, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
5. [REDACTED]
[REDACTED], Kansas City, MO 64106