

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

Police# 12-089643  
Prosecutor# 095367557  
1316-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

vs.

**Martin Olmedo  
117 N. Drury  
Kansas City, MO 64123  
DOB: 04/11/1992; Race/Sex: H/M;  
SS#**

**Defendant.**

**Count I. Murder 2nd degree (10031990)**

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 15, 2012, in the County of Jackson, State of Missouri, Aydan Perea was killed by being shot as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030(3), RSMo, committed by the defendant on or about December 15, 2012, in the County of Jackson, State of Missouri.

**Count II. Discharge/shoot firearm at/from motor vehicle/shoot at person, another motor vehicle or building/habitable structure - physical injury or death (31151130)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about December 15, 2012, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a white, Chevrolet Monte Carlo, a motor vehicle, and, as a result of the above described conduct, Aydan Perea suffered injury or death.

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CIRCUIT COURT  
JACKSON COUNTY, MO  
13 MAY 14 AM 11:00

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vs.

Martin Olmedo

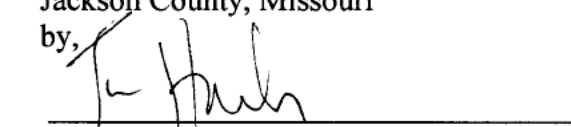
Count III. Armed criminal action (31010990)

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 15, 2012, in the county of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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 facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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.

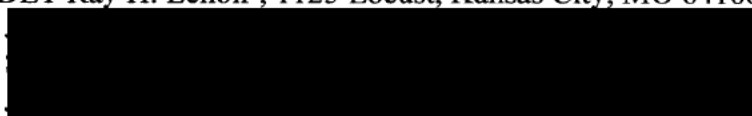
JEAN PETERS BAKER  
Prosecuting Attorney  
Jackson County, Missouri  
by,



Jordon T. Stanley (#57027)  
Assistant Prosecuting Attorney  
415 E. 12th Street, 11th Floor  
Kansas City, Missouri 64106  
(816) 881-4311  
JStanley@jacksongov.org

WITNESSES:

- DET Leland W. Blank , 1125 Locust, Kansas City, MO 64106
- DET Randy K. Evans , 1125 Locust, Kansas City, MO 64106
- DET Wayne C. Fitzner , 1125 Locust, Kansas City, MO 64106
- DET Leslie A. Foreman , 1125 Locust, Kansas City, MO 64106
- DET Daniel W. Frazier , 1125 Locust, Kansas City, MO 64106
- DET Ray H. Lenoir , 1125 Locust, Kansas City, MO 64106



DET Mark D. Spiegel , 1125 Locust, Kansas City, MO 64106

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PROBABLE CAUSE STATEMENT FORM

Date: 04/25/13

CRN: 12-089643

FILED  
JACOBSON COURT REPORTING CO  
BY

13 MAY 14 AM 11:00

I, DET. RAY H. LENOIR  
(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 12/15/12, at 2463 Denver in  
(Date) (Address)

Kansas City, Jackson Missouri MARTIN OLMEDO  
(County) (Name of Offender(s))

H/M, 04/11/1992, [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

1316CR01425

On December 15<sup>th</sup>, 2012 at 8:51 p.m., Officers of the Kansas City, Missouri Police Department were dispatched to 2463 Denver on a reported shooting. When they arrived they located four victims in a maroon 1991 Chevrolet Lumina. One of the victims was a four year old male with a gunshot wound to his head. The four year old was transported to a local hospital with life threatening injuries. One of the other victims in the car had been shot in the shoulder. Ten .45 caliber shell casings were found in the street in front of the residence. Seven of the shell casings had the headstamp "ArmsCor .45 Auto USA".

Witnesses in the area described the car as a two door white or cream colored 1970-1980's Chevrolet Monte Carlo or Buick Regal with tinted windows, light brown colored top, Dayton type wheels with spokes, and a gold lettered sticker in the back window.

One of the victims provided a statement and advised that he and the other victims were all sitting inside a vehicle in the driveway of 2463 Denver. The suspects drove south on Denver and as they approached the victim's vehicle they began shooting at them. The victim described the suspect vehicle as a white or cream colored two door vehicle, possibly an older model Chevrolet Monte Carlo or Buick Regal. The victim stated he has been in an ongoing feud with some males who live on the same block. He indicated these males were from a gang called "East Side".

On December 16<sup>th</sup>, 2012 information was recieved from the Gang Unit that a vehicle matching that description was possibly in the area of St. John and Drury to the north. We responded to the area and observed a 1984 White Chevrolet Monte Carlo, Missouri License KJ8G3T, VIN 1G1AZ37HXER180378 parked in front of 117 N. Drury. Upon looking in the vehicle, officers observed a large caliber spent shell casing in the back seat of the vehicle. The vehicle was registered to **Martin Olmedo** with an address of 117 N. Drury. The vehicle had spoke type wheels and a gold lettered sticker in the back window. The vehicle was towed to the Vehicle Processing Facility. A warrant was obtained to process the vehicle. One .45 spent shell casing, with the headstamp "ArmsCor .45 Auto USA" was found in the backseat of the vehicle. A second spent shell casing with the headstamp "ArmsCor .45 Auto USA" was found in the windshield wiper well on the outside of the passenger side of the vehicle.

The Gang Unit continued to conduct surveillance on 117 N. Drury and a short time later they observed a hispanic male exit the address and get into a red vehicle. Officers stopped the vehicle and identified the passenger as **Martin Olmedo**, h/m, 04-11-92. **Olmedo** responded to police headquarters and agreed to speak with detectives. During the interview detectives noted **Olmedo** to have the words "East Side" tattooed on his

PROBABLE CAUSE STATEMENT FORM

CRN 12-089643

knuckles. Olmedo admitted he was in the car at the time of the shooting. **Olmedo** would not tell detectives what his position inside the car was or who else was inside the car with him. **Olmedo** advised that he had relatives that lived on the street where the offense occurred. **Olmedo** provided his relatives names and detectives noted they were the same people whom the victim had advised he had an ongoing dispute with.

While conducting an area canvas on the block where **Olmedo** lived, Detectives contacted a witness who stated on 12/15/12 they observed the white Chevrolet Monte Carlo parked on the street around 8:00pm and saw a group of Hispanic males gathered around the vehicle. The witness looked outside around 10pm and the Monte Carlo was parked in a different location on the street and approximately three Hispanic males were looking inside of the vehicle with a flashlight.

Detectives contacted **Olmedo's** sister [REDACTED]. She stated on 12-15-12, she arrived home from work around 9:15pm and **Olmedo** and several friends were at the residence. **Olmedo's** vehicle was parked outside on the street at that time.

On 12/16/12 Detectives obtained a Search Warrant for **Olmedo's** residence, [REDACTED]. In the course of the search .45 caliber live rounds with the head stamp ArmsCor .45 were recovered from the living room couch.

On 01/23/13 a witness was contacted who revealed that they overheard **Martin Olmedo** admit to shooting at the victims. He also stated that he was not the only shooter. The witness advised that they were present when **Martin Olmedo** received a text message wherein the sender told him that he had "killed a boy". **Martin Olmedo** was then heard by the witness to say, "they're going to think it was me when I wasn't the only one shooting".

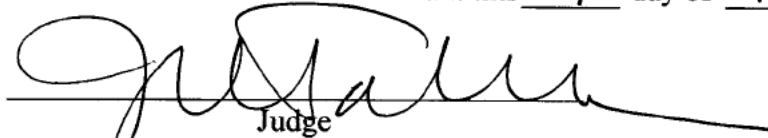
On 12/18/12, I submitted a request for analysis to the Regional Crime Lab. to have the spent .45 caliber shell casings recovered at the scene be compared to each other and then compare them to the spent .45 caliber shell casings recovered from the suspect vehicle. On 03/28/13, I received the Forensic Advantage Discovery Packet regarding this request from the lab. They found that the spent casings recovered at the scene were fired from two different .45 caliber firearms. They also found that the two spent shell casings recovered from the suspect vehicle were fired from the same two firearms that fired the spent casings recovered at the scene.

A search warrant to process **Olmedo's** cell was obtained. The information received showed that **Olmedo's** cell phone was hitting off the cell tower in the location of the homicide at the time the offense occurred.

Printed Name Det. Ray Lenoir

Signature  No. #3625

The Court finds probable cause and directs the issuance of a warrant this 14 day of May 2013

  
Judge

Circuit Court of Jackson County, State of Missouri.