

**PROBABLE CAUSE STATEMENT FORM**

Date: 05/30/2022

CRN: KC21080988

I, Detective Ian Hobbs #5552, Kansas City Police Department Homicide Unit, 1020 Squad  
(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 11/29/2021, at 8111 Independence Ave in  
(Date) (Address)

Kansas City, Jackson Missouri Noah Cole  
(County) (Name of Offender(s))

W/M 08/09/1998 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 11/29/2021 at 0953 hours officers with the Kansas City, Missouri Police Department were dispatched to Independence Ave and Potter Ave, Kansas City, Jackson County, Missouri in regard to a reported dead body. Upon arrival, they located a male victim suffering from apparent gunshot trauma, in the vacant lot at 8111 Independence Ave, Kansas City, Jackson County, Missouri. The male was declared deceased on scene. The Jackson County Medical Examiner's Office has ruled the manner of the victim's death, a homicide.

While conducting the initial investigation at the crime scene, detectives observed the victim's hands tied behind his back with a black rope. A single 9mm shell casing was recovered near the victim. Detectives observed zip ties and piece of duct tape, on the ground, in the vicinity of the crime scene. Crime scene technicians on scene noted that similar items (black rope, zip ties, and duct tape, all similar in appearance) were located in a vehicle they had processed for the Gladstone Police Department in regard to a homicide investigation in Gladstone, Missouri. Additionally, a 9mm shell casing was located in that vehicle.

On 11/30/2021 the shell casing from the aforementioned Gladstone homicide case was forensically linked to the shell casing recovered at 8111 Independence Ave by a Forensic Specialist with the Kansas City Police Crime Laboratory Firearms Section. Additionally, the casings were forensically matched to an aggravated assault that occurred in Raytown, Missouri on 11/27/2021. Five (5) 9mm shell casings were recovered in that case and three (3) matched the Gladstone homicide case, and the casing recovered at 8111 Independence Ave.

On 11/30/2021 Detectives contacted Witness #1 at the Gladstone Police Department. Witness #1 was in custody in regard to the aforementioned Gladstone homicide investigation. Witness #1 stated that Witness #1 and Noah Cole W/M 08/09/1998 both fired 9mm handguns at the aggravated assault scene in Raytown, Missouri on 11/27/2021. Witness #1 denied involvement in the homicide that occurred at 8111 Independence Ave. Witness #1 stated that the gun he fired in Raytown was currently in a red Chevrolet Van parked in front of a business across from his Probation Office at 18<sup>th</sup> and Prospect Ave, Kansas City, Jackson County Missouri. The van was subsequently located and towed to the city tow lot. On 12/03/2021 a search warrant was executed on the van and a Taurus GC3 9mm handgun was recovered from the vehicle. That firearm was forensically matched to the other shell casings at the scene of the Raytown aggravated assault but not the captioned case nor the aforementioned Gladstone homicide.

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On 12/02/2021 Detectives contacted Witness #2 who stated he picked up Cole, an unknown male, and an unknown female at a residence on St. John Ave, and drove them to a gun store near Interstate 70 and Sterling Rd in Kansas City. While at the gun store Cole and the other male started to steal merchandise so Witness #2 left them at the gun store. After leaving Cole and the unknown parties at the store, he realized an orange backpack had been left in his vehicle. He threw the backpack out of his vehicle on St. John Ave near the residence where he picked the parties up. Upon arriving home, Witness #2 realized three phones were left in his vehicle. A black iPhone with a cracked screen, a black iPhone in with a silver cover, and a black samsung phone.

On 12/02/2021 Detectives contacted Witness #3 at an area hospital. Witness #3 identified themselves as an associate and intimate partner of Noah Cole who had been charged in regard to the afformentioned homicide in Gladstone, Missouri as well as an intimate partner of the victim in this case. Witness #3 stated he last saw the victim leave 6004 Saint John Ave with Cole "a few days" prior to the interview. Witness #3 was unable to provide the specific day. Witness #3 did not hear from or see the victim after. The victim left the residence with Cole and "Christina"

On 12/14/2021 a forensic specialist in the Kansas City Police Department Crime Lab determined that DNA on the shell casing at the scene matched the DNA of Noah Cole. The genetic material on the shell casing is 53 billion times more likely to be observed if Noah Cole and an unknown individual are the contributors than if two unknown individuals are the contributors.

On 02/10/2022 Witness #4 provided detectives with a statement. Witness #4 said in the days after the victim's death an acquaintance of hers, who goes by "Riley" told her he was with Noah Cole earlier in the week, and that Cole killed the victim over a drug debt Doza's boyfriend owed Cole. Witness #4 was unable to provide Riley's actual name.

On 02/14/2022 the Kansas City police crime laboratory DNA section matched DNA recovered from the scene to the DNA standard of Noah Cole. DNA collected from Doza's left wrist was a match to Cole with the confidence of one in 680 Sextillion unrelated individuals. DNA collected from Doza's right wrist was a match to Cole's with the confidence of one in 2 Septillion individuals. DNA collected from the rope knot on the rope tied to Doza's wrists was a match to Cole's DNA with the confidence of one in 62 septillion individuals.

Printed Name Detective Ian Hobbs #5552 Signature /s/ Det. Ian Hobbs #5552

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.