

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

POLICE NO. :	KC24057259
PROSECUTOR NO. :	095479972
OCN:	

STATE OF MISSOURI,

PLAINTIFF,

vs.

JUAN MAIDEN

10615 Wallace Ave

Kansas City, MO 64134

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

DEFENDANT.

FILED

24-Jul-2024 19:48

CIRCUIT COURT OF
JACKSON COUNTY, MO

CASE NO. 2416-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

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 on or about July 23, 2024, in the County of Jackson, State of Missouri, the defendant knowingly, with the purpose of causing serious physical injury to [REDACTED], caused the death of [REDACTED] by shooting her. and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of [REDACTED] as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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 (571.015-001Y20205299.0)

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 on or about July 23, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the 2nd degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the 2nd 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.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B Felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 23, 2024, at [REDACTED], in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons, [REDACTED].

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. Armed Criminal Action (571.015-001Y20205299.0)

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 on or about July 23, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant

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committed the foregoing felony of unlawful use of a weapon 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 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/ Gerald Jackson

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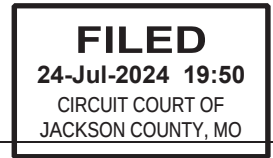
WITNESSES:

The State's witnesses as of 7/24/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 07/24/2024

CRN: KC24057259



I, Detective Robert Maser #5374, 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 07/23/2024, at in
(Date) (Address)

Kansas City, Jackson Missouri Juan Maiden
(County) (Name of Offender(s))

B/M committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07/23/2024 at 2137 hours, Officers of the Kansas City, Missouri Police Department were dispatched to , Kansas City, Jackson County, Missouri on a shooting. Upon officer's arrival they were contacted by (the victim's sister) and an unknown white male neighbor, who were outside the residence. They informed officers that the victim was inside the residence, she was shot by Juan Maiden, and that Maiden was still inside the residence. Officers attempted to make entry through the front door but the door was secured. Officers located a bedroom window on the west of the residence and made the determination that this window was the best point of entry into the residence. Due to the information provided by the witness that the victim was inside the residence and shot, officers broke out the window and made entry inside the residence. Officers located the victim in the hallway who had an apparent gunshot wound to her head. Officers got the victim out of the residence through the bedroom window where she was then transported her to North Kansas City Hospital by ambulance and later pronounced deceased. Maiden was still believed to be inside the residence at this time so an Operation 100 (TAC response to an armed barricaded suspect) was called and a concurrent homicide investigation was initiated.

Detectives contacted at North Kansas City Hospital and she stated the following: She was inside the residence with her sister (the victim) and Maiden. was in the bedroom speaking to her sister when Maiden entered the room and shot the victim unprovoked with a handgun. had no understanding why Maiden shot her sister as had been living with them and observed nothing to prompt that level of violence. The victim fell to the ground after being shot. stood over her and shot her two more times as she laid on the ground.

 attacked Maiden to defend her sister which led to a physical altercation that moved into the living room of the house. was able to overpower Maiden, knocking him to the ground and the gun out of his hand. She retrieved a nearby computer printer and began beating him over the head with it before

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realizing the gun was on the ground. She retrieved the weapon and attempted to shoot Maiden, but the gun was empty. She began hitting maiden with the weapon but stopped after a few moments, grabbed her cellphone, ran out of the house and called the police. She did not see Maiden leave the home and notified police of this fact when they arrived.

██████ was presented with a single photograph of Maiden whom she positively identified as the person who shot her sister.

During the course of the Operation 100, officers located Maiden in the basement of the address suffering from injuries to his head/face and he appeared under the influence of alcohol. Maiden was subsequently transported to a local area hospital for treatment. After being released from the hospital, Maiden was escorted to Headquarters for an interview. Maiden was read his Miranda Rights, agreed to speak with detectives and stated the following:

He was sitting on the couch in the living room attempting to install a ceiling fan along with ██████ and the victim. ██████ was in possession of the victim's handgun and began spinning the handgun around her finger. The handgun discharged twice striking the victim. He attempted to take the gun from ██████ but was unable to disarm her. ██████ began striking him with the firearm at which point he disengaged and went to the basement. He fell asleep in the basement and was awoken by member of the Kansas City Police Department.

Detectives obtained a search warrant and located the crime scene beginning in the home, on the west side of the residence, where a large window had been broken out; this occurred when officers were gaining entry to assist the victim. In the northwest bedroom was a pool of apparent blood on the floor. Two 9mm shell casings and one live 9mm round were present in the hallway outside of the bedroom, along with a pair of glasses. Two bullet holes were located in the floor of the hallway.

A computer printer was present in the middle of the living room with apparent blood. Two 9mm spent casings were located behind a couch in the living room. Near a different couch in the living room was one 9mm live round on the ground in front of it. A shirt was lying next to the live round with a black pistol magazine on top. A short distance away from the shirt, while still in the living room, was a black handgun, identified as a Taurus 9mm, bearing serial #ABC344551. A single 9mm spent shell casing was located on the small staircase leading into the garage.

Printed Name Detective Robert Maser #5374 Signature /S/ Det. Robert Maser #5374

The Court finds probable cause and directs the issuance of a warrant this 24th day of July, 2024.



PROBABLE CAUSE STATEMENT FORM

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Judge

Circuit Court of Jackson County, State of Missouri.