

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

Police# 15-057467
Prosecutor# 095431380
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Luis Sanchez
8605 Roberts Ave.
Kansas City, MO 64124
DOB: 10/04/1988; Race/Sex: W/M;
SS# Unknown
Defendant.**

Count I. 565.021 - Murder 1st Degree (565.020-001Y19840904.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **Class A Felony of Murder in the First Degree** punishable upon conviction under Section 565.020, RSMo, in that on or about August 15, 2015, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Jesus Dominguez by striking him with a vehicle.

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 (571.015-001Y19755299.0)

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 August 15, 2015, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First 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 First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

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,

Trisha Lacey (#55710)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, Missouri 64106
TLacey@jacksongov.org

WITNESSES:

DET Leland W. Blank , 1125 Locust, Kansas City, MO 64106

[REDACTED]

SGT Barbara J Eckert , 1125 Locust, Kansas City, MO 64106

DET Wayne C. Fitzner , 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

[REDACTED]

PO Carlos A. Mena , 1125 Locust, Kansas City, MO 64106

DET Kristofer R. Oldham , 1125 Locust, Kansas City, MO 64106

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 04/08/2016

CRN: 15-057467

I, Det. Wayne Fitzner 3685
(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 8-15-2015, at Independence Avenue and Spruce in
(Date) (Address)

Kansas City, Jackson Missouri Luis M. Sanchez, WM, 10-4-1988
(County) (Name of Offender(s))

committed one or more criminal offense(s).

(Description of Identity)

The facts supporting this belief are as follows:

On 08-15-15 at approximately 0300 hours, Officers with the Kansas City, Missouri Police Department were dispatched to the area of Independence Avenue and Spruce on a reported accident. Upon arrival they observed Jesus (Tamara) Dominguez, WM, 1-2-1979 lying in the rear parking lot behind 4233 Independence Avenue, Kansas City, Jackson County, Missouri. The victim was transported to an area hospital where he died as a result of his injuries. The Jackson County Medical Examiner declared his death a homicide due to multiple blunt force trauma.

It should be noted that Jesus Dominguez was know to family and friends as Tamara Dominguez. He had long below the shoulder hair, surgery implanted breasts and hips and always dressed like a female.

During the investigation a witness was contacted who stated the following:

On 8-15-2015 at about 0256 hours, he was walking east bound on the south side of Independence Avenue and Spruce, when he observed an all-black SUV, possibly an Escalade or Avalanche, parked along the west side of Spruce approximately two car lengths south of the intersection. He observed the victim whom he believed to be a female, exit the front passenger door of the vehicle and heard the door slam shut as the victim began walking southbound on the sidewalk. He further stated as he crossed the street he heard tires screeching and observed the suspect vehicle turn right, heard an impact and saw the suspect vehicle bump as if it was driving over the victim. He said the suspect's vehicle then stopped, the backup lights came on, it backed over the victim, stopped again and drove forward over the victim into the parking lot then drove out of the parking lot; continuing south on Spruce.

Surveillance video obtained from the building across the street showed the Avalanche as it drives up to Independence and Spruce while the victim is talking with a heavy set black female and a black female wearing a blond wig on the south east corner. As the truck pulls over to the curb the driver can be seen gesturing to the females and Dominguez. Dominguez leaves walking east bound and one of the other females gets into the suspect's vehicle then the truck drives away south on Spruce. About 30 minutes later the female who got into

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the suspect vehicle is seen walking north on Spruce to Independence avenue. That female was contacted and she gave a description of a heavy set, Hispanic male, with "Spikey" hair as the person who had been driving the truck. She said that they made a deal for oral sex then when he wanted intercourse and she refused he became angry and told her to get out of the truck. The heavy set female was also contacted who told us that the driver wanted Dominguez but when he walked off the female with the blond wig went with him.

Several minutes after walking east on Independence avenue from Spruce, Dominguez is captured on other surveillance video apparently soliciting at the intersection of Independence and Kensington. The surveillance shows the suspect vehicle (This is after he has told the female he picked up at Independence and Spruce to get out of his truck) drive past Dominguez going east on Independence avenue then he comes back north on Kensington parking on the east side several car lengths south of Independence avenue. Dominguez is seen walking to the vehicle and stands at the driver's door talking with the driver. After a few minutes he gets into the front passenger seat and they drive west on Independence avenue. The vehicle is picked up on video traveling west on Independence and then goes north on Spruce. Several minutes later the vehicle is observed driving south on Norton then turns east bound onto Independence then south onto Spruce where the homicide is committed.

The description of the vehicle, a black and gray Chevy Avalanche with black custom wheels was broadcast to the media. A TIP was received that led us to a Chevrolet Avalanche, License # 7AN214 MO located at 8605 Roberts Street, Kansas City, Missouri. The tipster explained that he had seen the vehicle park in front of his neighbor's house every morning for the past 2 or 3 weeks. The driver who was a Hispanic looking male in his 40's or 50's would park then get into his neighbors truck and they would leave, he thought they looked like construction workers. In the evening the male would come back with the neighbor then drive away in the Avalanche. He noticed that on the Monday we released the description of the vehicle to the media the truck had custom wheels on it similar to the ones on the suspect vehicle. Then on Tuesday he didn't see the vehicle and on Wednesday the vehicle had stock or silver colored wheels on it. The vehicle was registered to Luis M. Sanchez, WM, 10-4-1988. A warrant was obtained and the vehicle was transported to a FBI processing facility where the victim's DNA was found underneath the chassis of the vehicle. When his step-father, Aron Contreras, was interviewed that day he said that Luis was at work and hadn't come back yet. He explained that the vehicle had been Luis's mother's vehicle and that Luis had inherited it when she died a few months earlier. Contreras had been using the vehicle to drive to his friend's house where he would park it and drive with his friend to a work site. He had been using it because his truck had broken down and Luis was getting rides to work with a friend. However Luis lived with him and still had access to the vehicle.

Investigation showed that Luis Sanchez had worked as a mason for a construction company. His supervisor was contacted who told us that Luis had just stopped coming to work (Time frame would make it just after his vehicle was towed away). The supervisor explained that he had heard rumors from hearing several of Luis's work partners talking that Luis and been in some sort of traffic accident.

When Luis's sister Verence Sanchez was initially interviewed she told us that she had been informed by her step-dad (Aron Contreras) that Luis had to move to Columbia, Missouri to find work because he had been laid off from his current job (Luis's supervisor refuted that saying that Luis had stopped showing up for work and even had a pay check that was waiting for him which Aron Contreras had tried picking up but was not given).

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On 4-7-2016 at about 1900 hours, Verenice Sanchez and Aron Contreras (Luis's and Verenice's step-father) were transported to police headquarters by Kansas City Police detectives and FBI agents. Both parties were interviewed about what they knew about this homicide. Both parties admitted that they had not told the truth when first interviewed and then told us about what Luis Sanchez had told them regarding the homicide:

CONTRERAS advised SANCHEZ watched a news report of a person that was killed. CONTRERAS had a conversation and argument with SANCHEZ about the news report and SANCHEZ stated the individual (victim in news report) came to his vehicle on Friday night and attempted to rob him. SANCHEZ got the person away from the vehicle and then "hit" the individual. CONTRERAS did not know what he meant by hit, but later in the week of 08/21/2015, CONTRERAS believed SANCHEZ killed the person in the news report. A person CONTRERAS knew to be a "transvestite."

SANCHEZ disappeared from Kansas City after the conversation with CONTRERAS.

CONTRERAS advised SANCHEZ took the Chevrolet Avalanche on the night of 08/17/2015 to an unknown location. CONTRERAS found the keys to the vehicle on the morning of 08/18/2015 and SANCHEZ was gone. CONTRERAS has not seen SANCHEZ since.

CONTRERAS believed his step daughter VERENICE SANCHEZ has had contact with SANCHEZ.

SANCHEZ is believed to be in Denver, Colorado, staying in a trailer with his uncle JAIME JAQUEZ CAMPOS. The trailer is believed to be near the intersection of Federal and 76 Highway. SANCHEZ is believed to be working in construction.

CONTRERAS believed his mother in law who lived in a house near the above trailer, knew where SANCHEZ was located. CONTRERAS could not recall his former mother in law's name or her address.

During the interview on 4/7/2016, Verenice Sanchez explained that on or about the day that she sent Det. Fitzner the photograph of the Chevy Avalanche she had a conversation with her brother, Luis Sanchez during which, Luis told her that he had been involved in a bar altercation. Luis explained he had been in a local bar, when an altercation broke out. At some point Luis left the bar and returned to his vehicle. Luis told Verenice he hit someone with the Avalanche, but he did it in self-defense, because the other guy had pulled a gun on him. Luis also explained he saw on the news that the person he had hit died from the injuries.

Verenice explained after KCPD and the FBI showed up and seized the Avalanche for search on 8/21/2015, Luis fled to Colorado. Verenice was aware Luis was living in Colorado with his Uncle, Jaime Jaquez. Verenice did not know the address or phone number for Jaquez. Verenice had not been in direct contact with Luis since he fled to Colorado, but knew he was there through communication with Verenice and Luis' grandmother, Ramona Campos, date of birth 12/18/1947, home address 4982 Broadway, Denver, CO. Verenice explained Campos, Jaquez, and other family members are all aware Luis fled to Colorado because the police were looking for him in Kansas City.

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Printed Name Wayne Fitzner 3685 Signature *Det. Wayne Fitzner 3685*

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

Judge

Circuit Court of _____ County, State of Missouri.