

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

Police# 16-045390
Prosecutor# 095432970
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Michael L. Mathews
5508 Paloma Ave.
Kansas City, MO 64128
DOB: 11/03/1966; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 June 25, 2016, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Ayishia Shakir caused the death of Ayishia Shakir by stabbing her.

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 (571.015-001Y19755299.0)

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 June 25, 2016, 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 committed the foregoing felony of Murder in the Second 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 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.

THE STATE OF MISSOURI

vs.

Michael L. Mathews

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

PROBABLE CAUSE STATEMENT FORM

Date: 6/26/16

CRN: 16-45390

I, Det. Jeremy Wells #5015
(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 or about 6/25/16, at 5508 Paloma Ave in
(Date) (Address)

Kansas City, Jackson Missouri Michael L Mathews
(County) (Name of Offender(s))

b/m, 5'10", 177lbs, s.s.# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 6/25/16 at approximately 0953 hours, members of the Kansas City Missouri Police Department were dispatched on a cutting at 5508 Paloma Av, Kansas City, Jackson County, Missouri. Upon arrival, EMS forced entry into the locked residence. A deceased female was observed in the north east bedroom of the two bedroom residence. The victim was lying on her back on the floor of the north east bedroom on top of a deflated air mattress. A puncture defect was observed on the deflated air mattress. Only the victim's face was covered with bed sheet, and had apparent trauma from an edged weapon. Apparent blood was visible in the immediate area of the victim. Initial information obtained by officers indicated other individuals may reside at the residence, but were not present at the scene when officers arrived. The victim was determined to be Ayishia Shakir, b/f, 2/4/59, the resident of 5508 Paloma Av. The Jackson County Medical Examiner's Office has ruled the cause of death as sharp force trauma and the manner of death as homicide. The preliminary exam of the victim on 6/26/16 documented defects to her upper chest, neck, back of the shoulder, behind the right ear, bottom of the left foot, and defensive laceration wounds on both hands.

Call history information was obtained for 5508 Paloma Av which revealed on 5/1/16 at approximately 0932 hours, members of the Kansas City Missouri Police Department were dispatched to the residence on a disturbance involving a weapon. The notes associated with the call indicated the caller was arguing with her brother, and the brother stated he was going to kill her. Mathews, the victim (Shakir), and a third female party, were documented as having contact with responding officers but Mathews then left on foot with his girlfriend. Officers documented the subjects contacted appeared high and/or intoxicated and were hard to comprehend. A second call for service was generated on 5/1/16 at 1005 hours which documented the "party is back again." The call for service disposition related to the second call for service indicated Mathews was ticketed and arrested.

On 6/25/16 an area canvass was conducted after the deceased victim had been located, and a witness was contacted who described having observed the victim arguing with the victim's brother, "Mike" on the porch of 5508 Paloma Av on 6/24/16 at approximately 2300 hours over the victim not sharing "dipped More cigarettes." The witness described Mike as wanting the dipped cigarettes and the victim refused to share. The witness stated "Mike" a b/m, approximately 45 years old, has resided at 5508 Paloma Av for approximately one year.

PROBABLE CAUSE STATEMENT FORM

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A witness contacted at the scene after officers arrived was subsequently interviewed by detectives and stated the victim resided at 5508 Paloma Av with her brother. The witness identified the victim's brother as **Michael L Mathews, b/m, 11/3/66**. The witness described an argument between the victim and Mathews on or about the evening of 6/24/16 to 6/25/16 inside the residence in Mathews' north east bedroom. The witness stated **Mathews** said to the victim, "I'm so tired of you bitch." "I'm so sick of you bitch." **Mathews** then began repeatedly stabbing the victim who was initially standing up but the victim fell back on the bed. The witness observed the victim attempting to grab the knife as she was being stabbed.

A supervisor of **Mathew's** place of employment was contacted on the evening of 6/25/16 who advised detectives **Mathews** was terminated from his job between 1700-1800 hours on 6/24/16 after **Mathews** admitted to an HR employee he had been drinking. **Mathews** was observed to be acting strangely with varied expressed emotions ranging from laughter, anger, and crying.

On 6/25/16 at approximately 1600 hours, **Mathews** arrived at the scene on Paloma Av taped off with crime scene tape. **Mathews** crossed under the crime scene tape and identified himself and was placed under arrest on an Investigative HOLD.

Detectives contacted **Mathews** who waived his Miranda Waiver Rights. **Mathews** advised detectives on the evening of 6/24/16 he was sent home from work after he was caught urinating outside his place of employment and admitted to drinking. **Mathews** stated when he left his place of employment he purchased a six pack of beer and then went to a friend's house went and bought some "dips" which he admitted was PCP and described he and his female friend walked around to unknown locations and **Mathews** stated he was very high. **Mathews** stated he and his female friend responded to his residence, 5508 Paloma Av, where he has resided for approximately one year. **Mathews** was asked how long he was at the residence on the evening of 6/24/16, and he replied, "Not very long." **Mathews** denied having any verbal or physical altercation with his sister (victim). He stated he changed his clothes and left the residence with his female friend on foot in an easterly direction and did not return to the residence until the later afternoon of 6/25/16. **Mathews** account of his activities on 6/24/16 into 6/25/16 were vague and disjointed and his responses to specific questions resulted in a lot of "I don't knows" and "I don't remembers." **Mathews** was observed to have a bright pink scratch on his cheeks on either side of his nose.

Printed Name Det. Jeremy Wells #5015 Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.