

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

Police# 16-070719
Prosecutor# 095435092
1616-CR
OCN# W0010061

COMPLAINT

STATE OF MISSOURI

vs.

**Raymond C. Hoblia
5911 Kentucky Ave.
Kansas City, MO 64133
DOB: 11/21/1981; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Attempted Burglary 1st Degree (569.160-001Y19792204.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 569.160 and 564.011 RSMo, committed the **class C felony of attempted Burglary in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly tried to open a sliding door to a residence located at 4 [REDACTED] W. 59th Terrace, Kansas City, Missouri and owned by [REDACTED], while [REDACTED] was present inside such inhabitable structure, for the purpose of committing stealing therein, and such conduct was a substantial step toward the commission of Burglary in the First Degree and was done for the purpose of committing such burglary.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed five thousand dollars (\$5,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

Count II. Burglary 2nd Degree (569.170-001Y19792202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class C felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about September 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in an inhabitable structure, located at 4[REDACTED] Huntington Road, Kansas City, Missouri and owned by [REDACTED], for the purpose of committing stealing therein.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed five thousand dollars (\$5,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

Count III. Unlawful Possession Of A Firearm (571.070-001Y20085299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 571.070, RSMo, committed the **class C felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 560.011, RSMo, in that on or about September 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Kimber Solo 9mm handgun, a firearm, and the defendant was convicted of the felony of Robbery in the Second Degree in the Circuit Court of Jackson County in case number CR014388.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed five thousand dollars (\$5,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

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.

Raymond C. Hoblia

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Katherine Baker Nelson (#62733)
Assistant Prosecuting Attorney
415 E. 12th Street, 11th Floor
Kansas City, Missouri 64106
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WITNESSES:

PO Christopher D. DeFreece, 1125 Locust, Kansas City, MO 64106

DET Darla D. Harris, 1125 Locust, Kansas City, MO 64106

██████████ Prosecuting Atty. Office, Kansas City, MO 64106

DET Marc A. Lombardo, 7601 Prospect Ave., Kansas City, MO 64132

DET Patricia A. Marnett, 1125 Locust, Kansas City, MO 64106

PO Justin T. Palmer, 1125 Locust, Kansas City, MO 64106

DET George L. Springer, 1125 Locust, Kansas City, MO 64106

██████████, Prosecuting Atty. Office, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09/21/2016

CRN: 16-70719/ 16-70725

I, Detective George Springer #4093, of the 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 09/21/2016, at 4███ W. 59th Te./4███ W. Huntington in
(Date) (Address)

Kansas City, Jackson County Missouri Raymond C. Hoblia
(County) (Name of Offender(s))

W/M; 11/21/1981 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 09/21/2016, at approximately 0900 hours, ██████ heard a knock at his front door, located at 4███ W. 59th Terrace, Kansas City, Jackson County, Missouri. ██████ looked outside and observed a white male, approximately 30-40 years old, blonde hair, carrying a purple backpack, standing at his west side sliding door. The white male tried to open the sliding door on the west side of the house. ██████ called the police and the white male walked away from the residence. (CRN #16-70725)

On 09/21/2016, at approximately 0900 hours, Officers DeFreece, Morales, and Palmer were working in an undercover capacity and they responded to the area of 4███ W. 59th Terrace after the call of the prowler was received. The officers observed a white male matching the description given by ██████ including the purple backpack he was carrying on his shoulder. The white male walked west on Huntington towards Pennsylvania and knocked on the front door of 4███ W. Huntington, Kansas City, Jackson County, Missouri. The white male then walked east to Wornall Road, looked up and down the street and walked back to the driveway that separates 4███ W. Huntington and 4███ W. Huntington, Kansas City, Jackson County, Missouri. The officers lost sight of the white male for approximately one minute and believed he may be committing a burglary at one of the two residences. The officers exited their unmarked vehicles, dressed in police marked protective vests, and observed a west side window at ██████ Huntington had the screen cut and the window slightly opened. The officers surrounded the residence and requested additional, marked units and a police K-9. The purple backpack and a large hunting knife were left outside, under the opened window. Uniformed officers arrived and assisted in securing the perimeter around 4███ W. Huntington until a K-9 officer arrived. The K-9 conducted an interior search of the residence and located the white male, hiding in a closet of the northeast bedroom. The white male was taken into custody after suffering a dog bite and identified as **Raymond C. Hoblia, W/M, 11/21/1981**. Hoblia was transported to a local hospital for treatment for the dog bite.

The owner of 4███ W. Huntington, ██████ was contacted and responded to the scene. ██████ advised his wife was the last to leave the residence on 09/21/2016, between 8:30-9:00 a.m. and the residence was secured at that time. ██████ walked through his residence and discovered the west window screen was cut and a small planter had been pushed off the window sill inside the residence

PROBABLE CAUSE STATEMENT FORM

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and broken. The master bedroom and adjoining dressing room had several drawers opened, jewelry boxes opened, a gold vase containing coins dumped onto the bed, and his wife's iPad on the bed. The northeast bedroom, where **Hoblia** was found, had two closet doors opened, a wicker chair turned over and shoe boxes on the bed. [REDACTED] later identified two Mexican Peso coins, a rope chain necklace, and an Iphone as items stolen from inside his residence. Those items were recovered from **Hoblia**, after his arrest and while he was at the hospital. (CRN #16-70719)

An inventory of the purple backpack revealed a Kimber Solo 9mm semi-automatic handgun, serial #S1146259 in an outside compartment. The gun and magazine were empty however a computer check revealed the gun was stolen in a burglary on 09/20/2016, from Lees Summit, Missouri (Lees Summit Report #1-16-007585).

Hoblia was transported to Metro Patrol for questioning. After waiving his Miranda Rights, **Hoblia** admitted to the burglary at [REDACTED] W. Huntington but denied attempting to break into 4 [REDACTED] W. 59th Terrace. **Hoblia** admitted he was in Lees Summit, Missouri on 09/20/2016 however denied being involved in a burglary and denied knowing there was a gun in the backpack he was carrying. **Hoblia** also admitted that the purple backpack was his backpack.

Hoblia has felony convictions for Robbery and Armed Criminal Action in 2001 out of Jackson County, Missouri; Burglary in 2011 out of Jackson County, Missouri, making it unlawful for him to possess a firearm.

Printed Name Det. George Springer #4093

Signature Det. George Springer #4093

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

Judge

Circuit Court of _____ County, State of Missouri.