

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

<b>POLICE NO. :</b>	17-066732
<b>PROSECUTOR NO. :</b>	095440676

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>LOUIS SOLIZ</b>	)	
<b>804 Devon St.,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Independence, MO - 64055</b>	)	<b>DIVISION</b>
<b>DOB: 09/11/1967</b>	)	
<b>Race/Sex: W/M;</b>	)	
<b>SSN: XXX-XX-XXXX</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Sodomy Or Attempted Sodomy - 1st Degree - Aggravated Sexual Offense  
(566.060-002Y20171120.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the **Felony of Sodomy in the First Degree**, punishable upon conviction under Section 566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about July 28, 2017, in the County of Jackson, State of Missouri, the defendant, for the purpose of arousing or gratifying the sexual desire of the defendant or a person other than the defendant, knowingly had deviate sexual intercourse with an incapacitated person because of a permanent physical condition in which the person was unable to communicate unwillingness to act, by inserting his penis into [REDACTED]'s mouth.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served. The offense of sodomy in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five. No person found guilty of sodomy shall be granted an SIS or SES.

**Count II. Sexual Misconduct - 1st Degree - 1st Offense (566.093-002Y20131120.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.093, RSMo, committed the **Class B Misdemeanor of Sexual Misconduct in the First Degree** punishable upon conviction under Sections 566.093, 558.011 and 558.002, RSMo, in that on or about July 28, 2017, in the County of Jackson, State of Missouri, the defendant exposed

**State vs. Louis Soliz**

his genitals under circumstances in which he knew that such conduct was likely to cause affront or alarm.

The range of punishment for a class B misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed six (6) months; by a fine not to exceed one thousand dollars (\$1,000); 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.

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,

*/s/ Crispin M. Rea*  
Crispin M. Rea (#67810)  
Assistant Prosecuting Attorney  
415 E. 12<sup>th</sup> St., 7M  
Kansas City, MO - 64106  
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Crea@jacksongov.org

**WITNESSES:**

██████████, Prosecuting Atty. Office, Kansas City, MO - 64106  
DET Randy K. Evans, 1125 Locust, Kansas City, MO - 64106  
██████████ Prosecuting Atty. Office, Kansas City, MO - 64106  
PO Loren N. Morse, 1125 Locust, Kansas City, MO - 64106  
PO Zachary T. Usher, 1125 Locust, Kansas City, MO - 64106  
██████████ Atty. Office, Kansas City, MO - 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 08/04/2017

CRN: 17-66732

I, Det. Zac Usher #5014, 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 07/28/2017, at 7900 Lee's Summit Rd in  
(Date) (Address)

Kansas City, Jackson Missouri Louis J. Soliz  
(County) (Name of Offender(s))

W/M, 09/11/1967, 6'02", 195lbs, Brown hair, Brown eyes committed one or more criminal offense(s).  
(Description of Identity)

Sodomy

The facts supporting this belief are as follows:

On 07/29/2017, officers of the Kansas City, Missouri Police Department were dispatched to Truman Medical Center (TMC)-Lakewood located at **7900 Lee's Summit Road, Kansas City, Jackson County, Missouri** in regard to a reported rape. Upon arrival, officers contacted the charge nurse in the Long Term Care Unit, Floor 3 North (Witness 2) who stated he was informed by another employee (Witness 1) that **Louis J. Soliz W/M 09/11/1967**, also an employee, sodomized a patient (victim) in the Long Term Care Unit, Floor 3 North. It should be noted that due to a medical condition, the victim is unable to speak and has limited ability to move her arms and legs to defend herself.

Witness 1 stated on 07/28/2017, while she was working as a Certified Nursing Assistant at TMC-Lakewood on Floor 3 North, she walked into the victim's hospital room and observed **Soliz** standing next to the victim's bed behind the bed curtain. Upon closer observation, Witness 1 observed **Soliz** to have his pants down around his ankles and his penis inside the victim's mouth. Witness 1 stated she also observed **Soliz** to be making thrusting motions with his hips. Witness 1 confronted **Soliz**, then left the room in a state of shock. Witness 1 immediately returned to the victim's room to properly identify **Soliz**. When she returned to the room she observed **Soliz** standing at the end of the victim's bed with his pants still down around his ankles, masturbating. Witness 1 confronted **Soliz** again and he laughed and began apologizing. Witness 1 told **Soliz** she was going to report what he did to the appropriate supervisor. Witness 1 immediately notified the charge nurse, Witness 2, about what happened.

Witness 2 stated on 07/28/2017 he was working at TMC-Lakewood, Long Term Care, on Floor 3 North. Witness 2 stated when he was doing his routine checks on his patients, he entered a patient's room and was stopped by Witness 1 who shut the door behind him. Witness 1 whispered to Witness 2 that she just observed **Soliz** in the victim's room with his pants down and his penis in the victim's mouth. Witness 2 found **Soliz** and took him into another room to ask him what was going on. Before Witness 2 could ask any questions, **Soliz** stated to Witness 2, "It's true. I've had this problem for a while." Witness 2 immediately told **Soliz** to leave the hospital for the safety of the patients and notified a hospital administrator.

**PROBABLE CAUSE STATEMENT FORM**

CRN 17-66732

Crime Scene personnel responded to the victim's room. While processing items of potential evidence an alternative light source (ALS) was used as a presumptive test for bodily fluids. A pillow case, red throw pillow and a stain on the victim's headboard had a positive reaction to the ALS. Those items were processed as evidence and lab analysis is pending. The victim had a Sexual Assault Examination conducted and lab analysis is pending.

On 08/04/2017 Soliz was arrested on his Stop Order and transported to East Patrol Division located at 2640 Prospect Avenue, Kansas City, Jackson County, Missouri where he was booked in to the detention facility. Soliz was contacted by detectives and advised of his Miranda Rights which he invoked, requesting an attorney. A buccal swab was obtained from Soliz in conjunction with a search warrant and lab analysis is pending.

Printed Name Det. Zac Usher #5014 Signature *Zac Usher 5014*

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

\_\_\_\_\_  
Judge

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