

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	18-000395
PROSECUTOR NO. :	095443137

STATE OF MISSOURI,	)	
	PLAINTIFF,	)
vs.	)	
LUIS RAMIREZ	)	
3236 Anderson Apt. 2,	)	CASE NO. 1816-CR
Kansas City, MO - 64123	)	DIVISION
DOB: 11/30/2000	)	
Race/Sex: W/M;	)	
SSN: [REDACTED]	)	
	DEFENDANT.	)

COMPLAINT

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

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 January 2, 2018, in the County of Jackson, State of Missouri, Matthew J. Haylock was killed by being shot as a result of the attempted perpetration of the class A felony of Robbery in the First Degree under Section 570.023 RSMo, committed by the defendant on or about January 2, 2018, in the County of Jackson, State of Missouri.

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 (571.015-001Y19755213.0)

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 January 2, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count 1, 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 deadly weapon.

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. 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.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Hallie L. Williams

Hallie L. Williams (#66333)
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WITNESSES:


Matthew J. Haylock , , , -

State vs. Luis Ramirez

██████████ -

PO Amanda Huffman , 223 N. Memorial Drive, Independence, MO - 64050

DET Brice Minter , 223 N. Memorial Drive, Independence, MO - 64050

DET Erin Provost , 223 N. Memorial Drive, Independence, MO - 64050

DET Todd Winborn , 223 N. Memorial Drive, Independence, MO - 64050

PROBABLE CAUSE STATEMENT

Date: 1/4/2018

Report #: 2018-395

I, Brice Minter, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 1/2/2018, at 2032 hours, **LUIS A. RAMIREZ JR.**, (Race- Caucasian, Sex- Male, DOB- 11/30/2000, Address-3236 Anderson Avenue, Apt. #2, Kansas City, Missouri 64123, SSN- [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

LUIS A. RAMIREZ JR. and or referred to hereafter as the **DEFENDANT** committed the act of Murder; 2nd Degree and Armed Criminal Action by knowingly causing the death of **MATTHEW J. HAYLOCK** by conspiring to commit a robbery and in that act, the victim was shot one time in upper abdomen with possibly a Glock 9 mm semi-automatic handgun. The following are the supporting facts to the case:

On 01/02/2017 at approximately 2032 hours, Independence Police Officer(s) responded to 18801 E. 39th Street South (Independence Center), Independence, Jackson County, Missouri regarding a reported aggravated assault/shooting.

Upon arrival, it was determined that the victim identified as Matthew J. Haylock was located lying in the parking lot and had suffered a gunshot wound and was pronounced deceased by an American Medical Response Ambulance paramedic/EMT.

During the course of the investigation it was determined that there was a witness to the incident who was identified as the **DEFENDANT**. as he advised the following: He indicated that on 01/02/2018 at approximately 1900 hours, he and the CO-DEFENDANT identified as Tyler J. GATES were occupying an early 2000 white unknown make/model 4-door passenger vehicle later identified as a 2003 Chevrolet Cavalier. They arrived to the victims' residence where he displayed his Glock 9 mm to the both the **DEFENDANT** and CO-**DEFENDANT** as they all departed and eventually arrived to the area of the Independence Center in order to purchase some tennis shoes.

The **DEFENDANT** advised that as they were stationary at an intersection light while located at the off ramp from M-291 Highway and E. 39th Street South, the CO-DEFENDANT asked the victim if he could see his Glock semi-automatic handgun as the victim provided the item to him. They then proceeded to the Independence Center and continued around the outer road and reached the front entrance area to the Independence Center. The victim then requested his weapon back from the CO-DEFENDANT as he advised that he would provide the item back as soon as he parked the vehicle.

As they reached the parking lot while adjacent to the north entrance area of the mall, the CO-DEFENDANT acted as if he was going to park the vehicle as Ramirez exited from the right front passenger side of the vehicle. He further indicated that the CO-DEFENDANT then retrieved the victims' Glock 9 mm from his lap area and pointed the weapon at the victim as he was positioned as the right rear passenger. The CO-DEFENDANT then stated "I'm just going to tell you now this is me and fuck you".

The **DEFENDANT** indicated that he advised the CO-DEFENDANT that the victim was his friend and not to rob him as the vehicle began to pull away. He indicated that as he was walking behind the vehicle, he heard one gun shot and then ran up to the right front passenger door as the door was still ajar. He then observed the victim slumped over and unresponsive as the CO-DEFENDANT requested his assistance by disposing the body in the

parking lot as he refused. The CO-DEFENDANT then reached across from the driver side and physically pushed the victim out of the rear portion of the vehicle as he began to fall onto the parking lot.

The CO-DEFENDANT then asked the witness if he was coming with him as he refused and advised that he was contacting E-911. Detective Minter further confirmed based on a signed Consent to Search Cellular Phone form provided by the DEFENDANT that he contacted E-911 at 2031 hours based on his outgoing call log. The CO-DEFENDANT then departed from the Independence Center parking lot while retaining the weapon. It was later determined through the course of the investigation that Independence Police Officer Steele was getting ready to initiate a traffic stop on a white 2003 Chevrolet Cavalier but disengaged as Officer Virgil advised that he possibly had located the suspect vehicle in a different location.

It was later determined that the white Chevrolet Cavalier that Officer Steele was initially going to stop was the suspect vehicle as it was located at 3704 S. Randall while unoccupied. A search warrant was obtained that revealed an unknown red substance located in the right rear passenger seat that was presumed to be blood along with a Glock 26 and Glock 9 mm semi-automatic handguns located in the right front passenger seat.

It was later determined as a secondary interview was conducted with the DEFENDANT that he provided the CO-DEFENDANT with the Glock 26 containing an extended magazine for protection as the DEFENDANT had his residence shot at dated on 01/01/2018. He further advised that his last known knowledge of where the weapon was located inside the vehicle was "tucked" away around the driver side.

On 01/03/2018, Detective Aaron Gietzen conducted a formal interview with [REDACTED] and or the CO-DEFENDANT'S mother while located at Independence Police Headquarters. She further indicated that she contacted the CO-DEFENDANT at 2039 as he immediately requested her to retrieve him as he was in a frantic state. Mrs. [REDACTED] advised that she was originally contacting the CO-DEFENDANT because she had received information that the residence to where the CO-DEFENDANT and DEFENDANT were residing had been shot at, so she was worried about him and began trying to make contact. So as she made contact, she indicated that originally she could not understand him and was eventually advised that he was in an altercation and needed her to retrieve him as he pinged her phone with his GPS location. She further indicated that at 2054 hours, she had retrieved the CO-DEFENDANT while he was located in an unknown neighborhood behind an RV.

As she transported the CO-DEFENDANT back to her parent's residence, he advised her that he had gotten into an altercation in Independence and stated "I shot him mom". She further indicated that as he made the previous statement, the news broadcasted a live breaking story at the Independence Center. Once the DEFENDANT observed the news broadcast, he stated to Mrs. [REDACTED] that he "fucked his life up" and asked why he did this. He further insinuated to Mrs. [REDACTED] that he, the DEFENDANT and another unknown subject were meeting unknown person(s) at the Independence Center in order to "squash everything" regarding the CO-DEFENDANT'S house getting shot at. He advised that an unknown subject had entered into the passenger side of his vehicle and the unknown subject tried to "merc" (?) him. The CO-DEFENDANT further advised that the unknown subject tried to strike him in the head with the pistol and the next thing he knew was that he "heard it" and the unknown subject was shaking as he then pushed the victim out of the vehicle. Mrs. [REDACTED] reiterated her statement again as to what the CO-DEFENDANT advised her as he stated that he and the DEFENDANT met two unknown subjects at the Independence Center and a scuffle ensued and that he "shot him" and pushed him out of the vehicle.

As Mrs. [REDACTED] attempted to converse with the CO-DEFENDANT while on speaker phone while at Independence Police Headquarters and pleaded with him to turn himself into the police; he asked her who had come to the house as she responded and stated that the SWAT team came to house. The CO-DEFENDANT then stated "then that means Luis snitched then I'm going to kill him to". The CO-DEFENDANT then terminated the conversation with Mrs. [REDACTED].

On 01/04/2018, Detective(s) Brice Minter and Kyle D. Jarnagin conducted another interview with the **DEFENDANT** after information was developed from the CO-DEFENDANT that they both had conspired to commit a robbery of the victim in order to obtain his Glock 9 mm semi-automatic handgun. Detective Minter then provided the **DEFENDANT** with a previous signed Miranda Warning of Rights form and advised him that he was still under Miranda and confirmed that was his printed name on the form as he could not write cursive. After confirmation, the interview was conducted. It should be noted that Detective Aaron Gietzen with the Career Criminal Unit had obtained the above information during a recorded interview with the CO-DEFENDANT after reading him the Miranda Warning of Rights.

During the subsequent interview, the **DEFENDANT** admitted that approximately (3) days prior to the reported homicide dated on 01/02/2018, he along with the CO-DEFENDANT and victim had a 3-way Face Time conversation as the victim was displaying his acquired Glock 9 mm and a (50) round drum magazine. The **DEFENDANT** advised that he and the CO-DEFENDANT then conspired to commit a robbery and take the victims' Glock 9 mm. On 01/02/2018, the **DEFENDANT** advised that he and the CO-DEFENDANT were eating dinner at the Denny's Restaurant as the **DEFENDANT** claimed that they had a conversation as he no longer wanted to commit the robbery against the victim as the CO-DEFENDANT agreed.

After leaving the Denny's Restaurant, they later arrived to the victim's residence where he was in possession of the Glock 9 mm handgun as they ultimately arrived to the area of the Independence Center. The **DEFENDANT** further advised that the victim and CO-DEFENDANT have never physically met other than Face Time and Facebook. The **DEFENDANT** indicated that as they were parking, the CO-DEFENDANT asked if he could Snap Chat a picture with his Glock 9 mm as the victim provided him the weapon. At this time, the **DEFENDANT** exited from the vehicle and observed the initial confrontation between the CO-DEFENDANT and victim.

The CO-DEFENDANT then would not provide the weapon back to the victim as it was positioned on his lap. The **DEFENDANT** advised that the vehicle then began to pull forward and he believed that there was possibly a struggle for the weapon as he heard one gun shot. The **DEFENDANT** further indicated that he believed that the victim was shot with the Glock 26 handgun that was located in the driver side door, which had been previously provided to the CO-DEFENDANT.

The **DEFENDANT** further elaborated and indicated that he and the CO-DEFENDANT had obtained the Glock 26 from an unknown source on 01/02/2018 at approximately 0100 hours after his residence was shot at on 01/01/2018. The **DEFENDANT** advised that the weapon was loaned to them for protection and that he was unaware that it was reported as stolen from the Saint Joseph, Missouri Police Department.

Detective Brice Minter

/s/ Brice Minter

Print Name

Signature