This Complaint and Affidavit is to be:

Agency Form Number: 202400002319

Arrest Date: 02/19/2024

Filed with Court Clerk (cc: CA) Submitted to County Attorney

Filed with JCO - Defendant is a Juvenile **OFFENDER**

THE STATE OF IOWA

VS.

IN THE IOWA DISTRICT COURT IN AND FOR

LINNCOUNTY

Last LOUISMA			First MCKINLEY		Middle Suffix		
Address			City HIAWATHA		State IA	Zip Code 52233	
DL#	State IA	DL Class C	DL Endorsements		DL Restrictions		
Date of Birth	Gender Race MALE BLACK - B				Ethnicity NOT OF HISPANIC ORI	Ethnicity NOT OF HISPANIC ORIGIN - N	
Height 5' 08''	Weight 270 LBS		Eye Color BROWN - BRO		Hair Color BLACK - BLK		

VEHICLE

Year 2007	^{Make} HONDA - HOND		Model ACCORD		Color DBL	
VIN CDL Req?		·	Pass End Req?	HazMat End Req?	Style 4D	
Plate/Registration #			State IA	Year 2024	US DOT Number	ICC/MC #

OFFENSE

State County Local	Code Section 710.2		Crime Description KIDNAPPING 1ST DEGREE			Speed	i	in Zone
Class FELA Seri		Serious P.I.	erious P.I Fatal Accident Civil Damage Assessment			Othe	er	
Location Type 26 - PARK								
Literal Description								
Address			City CEDAR RAPIDS		Sta IA		p Code 2405	
Is Date and Time of Incident Incident Date or Low Range 02/17/2024		Upper Date Range 02/18/2024	Incident Time or Low Range 23:20		Upper 03:10	Time Range		

TAKEN INTO CUSTODY	CUSTODY 1 - JAILED	SUMMONS TO APPEAR (Citation Issued)
WARRANT REQUESTED	NO CONTACT ORDER REQUESTED	RELEASED TO PARENT/GUARDIAN

NARRATIVE

Narrative of Offense Committed

On or about the above stated date and time, the Defendant did

confine or remove Melody Hoffman from one place to another, knowing that he had neither the authority nor the consent of Melody Hoffman to do so with the intent to secretly confine her or with the intent to inflict serious injury upon her and as a consequence of the kidnaping Melody Hoffman suffered torture and serious injury, and/or aided and abetted another in the commission of the offense, at Morgan Creek Park, 7212 E Ave. NW, Cedar Rapids, Linn County, Iowa.

Printed At MARION POLICE DEPARTMENT 2/21/2024 7:30 PM Page 1 of 2 Form #: 202400002319

VICTIM INFORMATION (Optionally displayed, especially if NCO is requested) First Middle Suffix Last MELODY MARIE HOFFMAN Business/Organization/State/County/Municipality Name Address City State Zip MARION IA 52302

STATE OF IOWA,

LINN COUNTY

I, the undersigned, being duly sworn, state that all facts contained in this Complaint and Affidavit, known by me or told to me by other reliable persons form the basis for my belief that the defendant committed this crime

AFFIDAVIT

State all facts and persons relied upon supporting elements of alleged crime

On February 18, 2024, the lowa County Sheriff's Office responded to a report of a deceased person at a pond at 220th Trail and 38th Ave. in Amana, lowa County, lowa. The deceased person was identified as Melody Hoffman, age 20. The lowa State Medical Examiner's Office indicated that the preliminary opinion on Hoffman's cause of death was by strangulation. She also had numerous stab and slash wounds to her body. Investigators from the Marion Police Department, the Division of Criminal Investigations, the Linn County Sheriff's Office and the lowa County Sheriff's Office conducted an investigation into her death and disappearance and by talking to witnesses and tracking activity on her iPhone and her Apple watch through her iPhone they were able to determine that she was a picked up by the defendant in his vehicle around 11:00 p.m. on February 17, 2024, and remained with him until she died. Investigators determined that she was at Morgan Creek Park in Linn County when her Apple Watch recorded her heartbeat intensify before it either stopped or the device deactivated. The defendant's vehicle was located by investigators and a search warrant revealed the presence of her phone case, a white Apple Watch band with blood on it, a bungee cord, a towing rope, gloves and clothing matching the clothing she was wearing in a bag in the trunk of his car. The defendant then reportedly admitted to a DCI Special Agent that he was with Hoffman and another individual and that he and the other individual bound Hoffman with duct tape at Morgan Creek Park around her wrists, placed her in the trunk of the car and drove with her from Linn County to several different locations until they reached the pond in lowa County where he helped rip off her clothes before she was left at that location. The defendant reported that she was subject to being physically beaten while she was with him and the other person and was still seeing her when this happened but was also in a relationship with another woman. The defendant reportedly stated that if

FORT.	PHIL	M149

Signature of Complainant or Officer, Officer Name & Number

GENERAL PROBABLE CAUSE

Defendant Implicated 03 - ADMISSION/STATEMENTS, 05 - OPERATING MOTOR VEHICLE, 13 - CAUSED PERSONAL INJURY, 14 - OTHER PHYSICAL EVIDENCE

STATE OF IOWA, LINN COUNTY

Subscribed and sworn to before me by the person(s) sig	ning the Complaint and Affidavit(s) on 02/19/2024		
Notary Name MIKE ROZEK Signature of Verifying Party Commission Number 796719 My Commission Expires 06/14/2024 Peace Officer Notary			
Prosecuting Attorney			

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