

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 MALE	Race BLACK - B		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? NO	Pass End Req?	HazMat End Req?	Style 4D
Plate/Registration #			State IA	Year 2024	US DOT Number ICC/MC #

OFFENSE

State County Local <input checked="" type="checkbox"/> <input type="checkbox"/>	Code Section 706.3(1)	Crime Description CONSPIRACY TO COMMIT FORCIBLE FELONY			Speed	in Zone
Class FELC	Serious P.I. <input type="checkbox"/>	Fatal Accident <input type="checkbox"/>	Civil Damage Assessment <input type="checkbox"/>		Other <input type="checkbox"/>	
Location Type 26 - PARK						
Literal Description						
Address			City CEDAR RAPIDS		State IA	Zip Code 52405
Is Date and Time of Incident Known? NO	Incident Date or Low Range 02/17/2024	Upper Date Range 02/18/2024	Incident Time or Low Range 23:20		Upper Time Range 03:10	

STATUS OF OFFENDER/JUVENILE

<input checked="" type="checkbox"/> TAKEN INTO CUSTODY	CUSTODY 1 - JAILED	SUMMONS TO APPEAR (Citation Issued)
<input type="checkbox"/> 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
Conspire with one or more persons with the intent to promote or facilitate the commission of a forcible felony by agreeing with another that they or one or more of them will engage in conduct constituting the crime or an attempt or solicitation to commit the crime and/or agree to aid another in the planning or commission of the crime or of an attempt or solicitation to commit the crime at Morgan Creek Park, 7212 E Ave. NW, Cedar Rapids, Linn County, Iowa.

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VICTIM INFORMATION (Optionally displayed, especially if NCO is requested)

Last HOFFMAN	First MELODY	Middle MARIE	Suffix
Business/Organization/State/County/Municipality Name			
Address		City MARION	State IA Zip 52302

AFFIDAVIT

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

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

On February 18, 2024, the Iowa County Sheriff's Office responded to a report of a deceased person at a pond at 220th Trail and 38th Ave. in Amana, Iowa County, Iowa. The deceased person was identified as Melody Hoffman, age 20. The Iowa 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 Iowa 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 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 Iowa 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 begging to be let go. The defendant had been in an intimate relationship with Hoffman and was still seeing her when this happened but was also in a relationship with another woman. The defendant reportedly stated that if investigators were to ask the other individual what happened, the other individual would probably put the blame on him.

[Redacted Signature]

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		
Operating Motor Vehicle in County Linn - 57	Other Physical Evidence	Attempted To Inflict Injury

STATE OF IOWA, LINN COUNTY



Subscribed and sworn to before me by the person(s) signing the Complaint and Affidavit(s) on
02/19/2024

Notary Name **MIKE ROZEK** Signature of Verifying Party

Commission Number **796719**
Prosecuting Attorney



My Commission Expires **06/14/2024** Peace Officer Notary