

STATE OF INDIANA)	IN THE KOSCIUSKO CIRCUIT/SUPERIOR COURT
)SS:	
COUNTY OF KOSCIUSKO)	CAUSE NO.
)	
STATE OF INDIANA,)	
Plaintiff)	
vs.)	
)	
JUAN M RAMIREZ GARCIA,)	
Defendant)	
340 E. Levi Lee Rd. #139)	
Warsaw In, 46582)	
DOB: 12/30/1969)	
OLN: 4240-05-4215-IN)	
OLN EXP: 12/30/2025)	

COUNT I
ATTEMPTED MURDER
LEVEL 1 FELONY
IC 35-41-5-1/IC 35-42-1-1 (1)

The undersigned, being duly sworn upon his oath, says that on or about the 22nd day of February, 2020 at and within Kosciusko County, State of Indiana, JUAN M RAMIREZ GARCIA, did knowingly or intentionally attempt to kill another human being, namely, Martha Ramirez, the same being contrary to the form of the statute, in such cases made and provided, and against the peace and dignity of the State of Indiana.

COUNT II
AGGRAVATED BATTERY
LEVEL 3 FELONY
IC 35-42-2-1.5

The undersigned, being duly sworn upon his oath, says that on or about the 22nd day of February, 2020 at and within Kosciusko County, State of Indiana, JUAN M RAMIREZ GARCIA, did knowingly or intentionally inflict injury on a person, namely, Martha Ramirez, that caused a substantial risk of death, the same being contrary to the form of the statute, in such cases made and provided, and against the peace and dignity of the State of Indiana.

COUNT III
DOMESTIC BATTERY
SERIOUS BODILY INJURY
LEVEL 5 FELONY
IC 35-42-2-1.3(c)(1)

The undersigned, being sworn upon his oath, says that on or about the 22nd day of February, 2020 at and within Kosciusko County, State of Indiana, JUAN M RAMIREZ GARCIA, did knowingly or intentionally

touch a family or household member, namely, Martha Ramirez, in a rude, insolent, or angry manner, resulting in serious bodily injury, to Martha Ramirez, the same being contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Indiana.

COUNT IV
BATTERY
(WHILE ARMED WITH A DEADLY WEAPON)
LEVEL 5 FELONY
IC 35-42-2-1 (g)(2)

The undersigned, being duly sworn upon his oath, says that on or about the 22nd day of February, 2020 at and within Kosciusko County, State of Indiana, JUAN M RAMIREZ GARCIA did knowingly or intentionally touch another person, Martha Ramirez, in a rude, insolent, or angry manner, while armed with a deadly weapon, the same being contrary to the form of IC 35-42-2-1 in such cases made and provided, and against the peace and dignity of the State of Indiana.

COUNT V
DOMESTIC BATTERY WITH A
CHILD UNDER SIXTEEN (16) PRESENT
LEVEL 6 FELONY
I.C. 35-42-2-1.3 (b)(2)

The undersigned, being duly sworn upon his oath, says that on or about the 22nd day of February, 2020, at and within Kosciusko County, State of Indiana, JUAN M RAMIREZ GARCIA, who is at least eighteen (18) years of age born 12/30/1969 (50), did knowingly or intentionally touch another person, namely, Martha Ramirez, a family or household member (as defined in 35-31.5 -2-128), in a rude, insolent, or angry manner, and committed the offense in the physical presence of a child less than sixteen (16) years of age, namely A.A. born [REDACTED] namely B.B. born [REDACTED] namely C.C. born [REDACTED] and D.D. born [REDACTED] knowing that the child was present and might be able to see or hear the offense, all of which is contrary to the form of statute, in such cases made and provided, and against the peace and dignity of the State of Indiana.


COUNT VI
DOMESTIC BATTERY
MODERATE BODILY INJURY
LEVEL 6 FELONY
IC 35-42-2-1.3(b)(3)

The undersigned, being sworn upon his oath, says that on or about the 22nd day of February, 2020 at and within Kosciusko County, State of Indiana, JUAN M RAMIREZ GARCIA, did knowingly or intentionally touch a family or household member, namely, Rosio Ramirez, in a rude, insolent, or angry manner, resulting

in moderate bodily injury, to Rosio Ramirez, the same being contrary to the form of the statute in such cases made and provided, and against the peace and dignity of the State of Indiana.

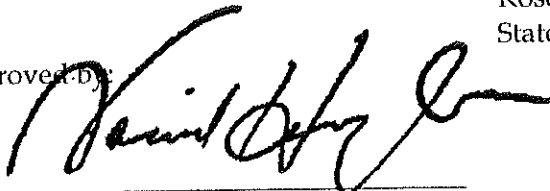
I affirm under the penalties of perjury, that the foregoing is true and accurate to the best of my knowledge and belief.

2/24/2020
Date



Det. Sgt. Neil Likens
Kosciusko County Sheriff's Department
State of Indiana

Approved by:



Prosecuting Attorney
54th Judicial Circuit, State of Indiana

STATE OF INDIANA)	IN THE KOSCIUSKO CIRCUIT/SUPERIOR COURT
) §:	
KOSCIUSKO COUNTY)	CAUSE NUMBER: 43
STATE OF INDIANA)	
VS.)	
)	
JUAN M RAMIREZ GARCIA,)	
340 E. Levi Lee Rd. #139)	
Warsaw In, 46582)	
DOB: 12/30/1969)	
OLN: 4240-05-4215-IN)	
OLN EXP: 12/30/2025)	

AFFIDAVIT OF PROBABLE CAUSE

The undersigned, being duly sworn upon his oath, deposes and says as follows:

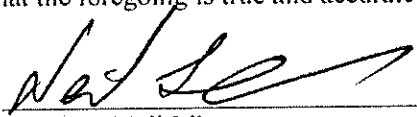
1. That the undersigned is a law enforcement officer employed by the Kosciusko County Sheriff's Office.
2. On February 22nd, 2020 at approximately 8:11 A.M., emergency personnel were dispatched to [REDACTED] in Kosciusko County reference to a stabbing. While enroute to the location, dispatch continued relaying information to responders, advising that a male subject had stabbed a female subject.
3. Upon arrival at the scene Sgt. Michael Mulligan approached a group of individuals near [REDACTED] and asked who was the suspect for the stabbing. The group pointed to a male subject in a Black and Red Jacket, later identified as JUAN M. RAMIREZ GARCIA, with what appeared to be blood down the front of his clothing. The male subject was bleeding from the neck area.
4. The female victim, identified as Martha Ramirez, was covered in blood had multiple stab wounds to her face and head. Maria Ramirez had a cover on her face and head to stop the bleeding. The undersigned later learned that Maria Ramirez had also been stabbed chest, and that all the wounds were inflicted by her husband, JUAN M. RAMIREZ GARCIA, during an argument. Maria Ramirez was airlifted to Lutheran Hospital in Fort Wayne, by Lutheran Air.
5. The undersigned interviewed Rosio Ramirez who advised that she woke up to her mom, Martha Ramirez, and dad, Juan Ramirez Garcia, screaming. Rosio Ramirez went to see what was going on, and saw blood on her mother. Ms. Ramirez advised that Martha Ramirez told her that JUAN M. RAMIREZ GARCIA had a knife. Rosio Ramirez advised that she was able to get the knife away from JUAN M. RAMIREZ GARCIA, and then attempted to get him to leave the residence. Rosio Ramirez advised that she pushed JUAN M. RAMIREZ GARCIA and was able to get him to let go of Martha Ramirez. JUAN M. RAMIREZ GARCIA then grabbed both Rosio Ramirez and Martha Ramirez by the hair and dragged them both down the front steps into the yard. Rosio Ramirez reported that once all parties were separated in the front yard, her father cut his own throat with a second knife.
6. The children present in the residence at the time of the domestic dispute were A.A. born [REDACTED] B.B.

born [REDACTED] C.C. born [REDACTED] and D.D. born [REDACTED] The children were present during the domestic altercation, and actively attempted to stop the abuse during the event.

7. The undersigned was advised by medical personnel that the stab wound to the chest was deep, and the wound's location created a risk of death to Martha Ramirez.
8. In the course of the investigation, the undersigned learned that JUAN M. RAMIREZ GARCIA has a prior conviction for Intimidation, Level 5 Felony, in cause number 85C01-1512-F5-1104, on November 21, 2016; and a prior conviction for Battery to a Public Safety Official, Level 6 Felony, in cause number 85C01-1605-F6-512, on November 21, 2016.

I affirm under the penalties of perjury, that the foregoing is true and accurate to the best of my knowledge.

Dated: 2/24/2020



Det. Sgt. Neil Likens
Kosciusko County Sheriff's Office