

IN THE TRIAL COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

State of Alaska)
Plaintiff)

Vs.)

Thomas Patrick Layou)

DOB: [REDACTED])

APSIN ID: [REDACTED])

Defendant)

Thomas Patrick Layou)

DOB: [REDACTED])

APSIN ID: [REDACTED])

3AN-21- 7585 CR
ATN: 113330223

COMPLAINT

VRA Certification

I certify that this document and its attachments do not contain (1) the name of a victim of a sexual offense listed in AS 12.61.140 or (2) a residence or business address or telephone number of a victim of or a witness to any offense unless it is an address used to identify the place of the crime or it is an address or telephone number in a transcript of a court proceeding and disclosure of the information was ordered by the court.

DOMESTIC VIOLENCE OFFENSES Per AS 18.66.990(3) and (5)

ALL COUNTS NONE SPECIFIED BELOW

Count I

Murder in the First Degree

AS 11.41.100(a)(1)(A)

THE COMPLAINT CHARGES

Count I

That on or about the 10th day of October 2021, at or near Anchorage in the Third Judicial District, State of Alaska, Thomas Patrick Layou , with intent to cause the death of another person, caused the death of Patrice Layou.

All of which is an Unclassified felony offense being contrary to and in violation of AS 11.41.100(A)(1) and against the peace and dignity of the State of Alaska.

Count 11

That on or about the 10th day of October, 2021 at or near Anchorage in the Third Judicial District, State of Alaska, Thomas Patrick Layou, with the intent to cause serious physical injury to another person or knowing that the conduct is substantially certain to cause death or serious physical injury to another person, did cause the death of Patrice Layou.

All of which is an Unclassified felony offense being contrary to and in violation of AS 11.41.110(A)(2) and against the peace and dignity of the State of Alaska.

AFFIDAVIT OF DETECTIVE DAVID CORDIE

I, D. CORDIE, being first duly sworn on oath, hereby depose and state:

1. I was a part-time Sheriffs Deputy for the Olmsted County Sheriffs Department in Rochester Minnesota from 1997-2005. I attended the Minnesota Law Enforcement Academy (over 440 hours) and graduated in 2004. The training included crime scene investigation, evidence collection, latent finger print detection and collection, and photography. I received training in the Standardized Field Sobriety Testing at the Sheriffs Department and in the Minnesota Skills Training for Law Enforcement.
2. I have an Associate Science Degree in Law Enforcement from Rochester Community and Technical College (2004).
3. I have been employed with the Anchorage Police Department since August 15, 2005. I graduated from the Anchorage Police Department Police Academy in August 2006, which consisted of over 999 hours of training. The training included crime scene investigation, evidence collection, latent finger print detection and collection, and photography. I completed over 700 hours of the FTO (Field Training Officer) program, from August 2006 to December 2006. During the Police Academy, I received training in Municipal and State laws, and laws governing controlled substances, extensive Driving While Intoxicated training including the Datamaster and Standardized Field

Sobriety Tests. While in the academy I had training in crime scene investigations, evidence seizure and handling.

4. In September of 2008, I was assigned to the Detective Division Theft Unit. On about February 15, 2009 I was reassigned to the Homicide Unit.

5. While on uniform patrol duty and detective assignments, I responded to and investigated Misdemeanor and Felony crimes. I applied for and was granted arrest and search warrants for Misdemeanor and Felony crimes and investigations.

6. The information in this affidavit is based on the affiant's personal knowledge and or the observation of other officers and witnesses involved in this investigation, as reported to me either orally or via their written reports.

7. The crime scene described in the search warrant will probably contain some of the evidence described in the search warrant and that any such evidence will aid in establishing the identity of the perpetrator(s) and the circumstance(s) under which the crime identified in the search warrant was committed. That such evidence requires a detailed and systematic search in order to locate, seize, record and process it.

Probable Cause Statement reference APD Case 21-32817

8. On Sunday 10-10-21 at about 0319 hours, Anchorage Police Department (A.P.D.) Dispatch received two 911 calls in reference several gun shots heard in the area of 46th Ave. and Folker Street.

9. A.P.D. Patrol Officers arrived on scene and located a green Subaru parked in the lot for the park located on the corner of 46th Ave. and Folker Street. Officers noted the license plate of [REDACTED] which is currently registered to a PATRICE LYNORE LAYOU [REDACTED] or RANDON ALAN RIBBLE. The listed address for LAYOU is [REDACTED] in Anchorage.

10. Patrol Officers located an adult female lying on the ground near the Subaru. Officers noted the female had what appeared to be several gunshot wounds to the head and neck area. Medics arrived on scene and declared the female deceased. Officers noted a set of car keys next to the victim. Officer DORSEY compared a DMV photo of LAYOU to the female gunshot victim and Ofc. DORSEY reported it appears to be the same person.

11. Patrol Officers located a witness across the street from the shooting scene, who was out on his deck. The witness described seeing a skinny (thin) unknown male, wearing a blue hoodie, blue jeans, and white face mask in the area of the shooting. The witness was transported to A.P.D. (HQ) and provided additional information to Homicide Detectives. The witness added the unknown male he saw leaving the area of the shooting scene had on a blue hoodie with some type of white lettering or

emblem on it. The male was about 6-0 tall and walked away north bound towards Tudor Road.

12. Officer DORSEY reported research shows PATRICE LAYOU has a son, THOMAS LAYOU, who lives at [REDACTED]. Further research shows [REDACTED] is a multi-unit apartment complex located several hundred feet to the north of the shooting scene.

13. Patrol Officers located a witness who lives at [REDACTED]. This witness described hearing the gunshots and then about 5-10 minutes later a person walks up the stairs and goes into unit [REDACTED] which is directly across the hall from unit [REDACTED]. The witness described how he heard the shower turn on shortly after the person entered unit [REDACTED]. The witness said he thought the person entering unit [REDACTED] right after the gunshots, was his neighbor THOMAS who he has had problems with the past couple of weeks. The witness described how his neighbor THOMAS would knock on his door all the time. Homicide Det. CLARK interviewed this witness at A.P.D. (HQ) and the witness provided a video from this past Friday, 10-08-21 at 1316 hours. The video shows a female outside getting into a Subaru outside of [REDACTED]. In audio portion of the video a male could be heard yelling and cussing the word, "Cunt". The witness reported he felt this THOMAS yelling at his mother.

14. Patrol Officers went to [REDACTED] and made contact with THOMAS LOYOU [REDACTED] at the door. THOMAS told the officers he was scared. Officers took THOMAS into custody and transported him to A.P.D. (HQ) to be interviewed by detectives. Officers reported seeing a gun holster on the table, when officers conducted a safety clearance of the apartment, where no other persons were located inside of the apartment. THOMAS LAYOU was wearing gray sweatpants and an orange shirt when he was transported to A.P.D.

15. A.P.S.I.N. research shows THOMAS LAYOU is 5-11 tall, and 150 lbs. On 10-02-2021 Airport Police put a locate in A.P.S.I.N. that THOMAS carries a handgun in his waistband.

16. Det. CLARK conducted follow up in regard to the Airport locate from 10-02-21. Det. CLARK spoke with Airport Police Lt. JUAREZ who confirmed the incident that took place at the airport on 10-02-21. Lt. JUAREZ reported they THOMAS made contact with TSA and inquired if he could fly with a firearm on his person, and THOMAS pointed to his waistband like he had a firearm. THOMAS ended calling the Airport Police himself and told them he didn't feel safe so Airport Officers detained THOMAS on a mental health hold and transported THOMAS to API to be evaluated. Airport Police contact PATRICE LOYOU who arrived on scene and allowed officers to search her Subaru, the vehicle that THOMAS used to get to the airport. Officers located a Smith and Wesson handgun in the glove box of PATRICE'S Subaru. The pistol was released to PATRICE along with the Subaru.

17. Lead Case Detective B. LEE and Sgt. CROSS made contact with RANDON RIBBLE and made next of kin contact related to Victim Patrice Layou. Det. LEE interviewed RIBBLE;

RANDON RIBBLE said he has been married to PATRICE LAYOU for 15 years. RIBBLE said he has known THOMAS LAYOU since he had been with PATRICE. RIBBLE said THOMAS suffered from mental health issues his whole life but has been off his medications for the last month. RIBBLE said over the last week, THOMAS has been having violent yelling episodes where he will call PATRICE and yell at them over the phone. RIBBLE said he has heard THOMAS calling PATRICE vulgar names during these phone calls. RIBBLE said on October 10th, 2021 at about 0200, he heard PATRICE on the phone with THOMAS.

RIBBLE described this phone call as much calmer than the ones over the last week. RIBBLE said PATRICE told him she was going to THOMAS' place and talk to him. RIBBLE described THOMAS' residence as an apartment off [REDACTED] near [REDACTED]. RIBBLE said before PATRICE left, she made a comment about not knowing if THOMAS would even let her in. RIBBLE said PATRICE left sometime between 0300 and 0400 and he had not seen or heard from her since then. RIBBLE said he knew that THOMAS had a .22 rifle and a small handgun, unknown type.

18. Lead Crime Scene Sgt. BAKKEN forwarded information that at least one gunshot wound on Victim PATRICE LAYOU'S head appeared to be a close contact type of wound. Sgt. BAKKEN added no shell casings were located at the scene, which would lead a person to believe the firearm used was a revolver.

19. Sgt. BAKKEN reported crime scene personal located a 357-revolver pistol in THOMAS LAYOU'S bedroom at [REDACTED]. The revolver had 5 spent casings in the firearm when located. Closer inspection of the firearm showed what appears to be blood on the bottom portion of the barrel. Another revolver was located in the apartment but that had all live ammunition in the firearm.

20. Crime scene personal located water drops in the bathtub consistent with the witness statements of hearing the shower being turned on. In addition, crime scene personal located what appears to be blood transfer on the bathroom wall near the bathtub.

21. Crime scene personal located a black tee- shirt with white lettering on the front, and a pair of blue jeans in THOMAS' bedroom. Both clothing items were in a pile on floor near the door. The jeans had an area on the pants cuff, that showed a presumptive positive test for blood.

22. Crime scene personal found what appears to be blood transfer spot near the sliding glass door in the kitchen. This sliding glass door over looks Folker Street.


Requests

23. For reasons set forth in this affidavit, an arrest warrant is respectfully requested for Thomas Patrick Layou [REDACTED] for Murder in the First Degree, with intent to cause the death of another person, caused the death of Patrice Layou.

24. For reasons set forth in this affidavit, an arrest warrant is respectfully requested for Thomas Patrick Layou [REDACTED] for Murder in the Second Degree, with the intent to cause serious physical injury to another person or knowing that the conduct is substantially certain to cause death or serious physical injury to another person, did cause the death of Patrice Layou.

25. Since this affidavit is based on information provided to me by other law enforcement officers, my own investigation of this matter, and from my knowledge, training, and experience, and is being submitted for the limited purpose of securing an arrest warrant for the violation of Murder, I have not included each and every fact known to me regarding this investigation. I have set forth only the facts that I believe are necessary to establish a foundation (Probable Cause) for the requested arrest warrant(s).

FURTHER YOUR AFFIANT SAYETH NAUGHT,



A handwritten signature in cursive script, appearing to read "Det. D Cordie", written over a horizontal line.

Detective David Cordie DSN 30103
Anchorage Police Department

SUBSCRIBED AND SWORN to affirm before me this 10th day of October 2021

MAGISTRATE / DISTRICT SUPERIOR COURT JUDGE