

OBTS Number		PROBABLE CAUSE AFFIDAVIT		1 Arrest 2 NTA		Request for Warrant Arrest for Capias		3		Juvenile	
Agency ORI Number FL 050015A		Agency Name Office of the State Attorney 15 th Judicial District				Agency Report Number SA 15 - 3081					
Charge Type Check all that Apply		1. Felony <input checked="" type="checkbox"/>		3 Misdemeanor <input type="checkbox"/>		5 Ordinance <input type="checkbox"/>		Special Notes			
		2 Traffic Felony <input type="checkbox"/>		4 Traffic Misdemeanor <input type="checkbox"/>		6 Other <input type="checkbox"/>					
Name (Last, First, Middle) RAJA Nouman Khan				Alias "Raj"		Race [REDACTED]		Sex [REDACTED]		Date of Birth [REDACTED]	
Charge Description Manslaughter with a Firearm - F.S.S. 782.07(1)				Charge Description Attempted First Degree Murder with a Firearm - F.S.S. 777.04(1) and 782.04 (1)(a)(1) and 775.087 (1) and (2)							
Victim's Name (Last, First, Middle) JONES Corey Lamar				Race B		Sex M		Date of Birth 02-03-1984			
The undersigned certifies and swears that he has just and reasonable grounds to believe, and does believe the above- named defendant committed the following violations of law. The person taken into custody:											
<input type="checkbox"/> Committed the below acts in my presence.		<input type="checkbox"/> Was observed by		Who told							
<input type="checkbox"/> Confessed to		Admitting the below		<input checked="" type="checkbox"/> Was found to have committed the below acts, resulting from my (described) investigation.							
On the 18 Day of October, 2015 At 3:15 X A.M.											

Corey Jones, age 31, was shot and killed by Nouman Raja, a Palm Beach Gardens police officer, at approximately 3:15 a.m. on Sunday, October 18, 2015. Dr. Gertrude Juste, M.D., an Associate Medical Examiner in Palm Beach County, performed the autopsy on Jones. Dr. Juste ruled Jones' death was a homicide caused by a gunshot wound to his chest.

Corey Jones was the drummer for the "Future Prezidents," a Palm Beach County-based reggae band. The band performed at a venue in Jupiter, Florida, from about 10:00 p.m. on Saturday, 10-17-2015, until about 1:15 a.m. on Sunday, 10-18-2015. Jones loaded his drum equipment into his vehicle before he began driving south on I-95. His vehicle had a mechanical problem, causing him to exit the highway. He drove onto the PGA Boulevard off-ramp and stopped on the west edge of the ramp. Jones called a male friend, a band mate, at 1:36 a.m. The friend agreed to drive to Jones' location and attempt to help him. Jones dialed *FHP on his cell phone at 1:44 a.m. to request roadside assistance. A road ranger was dispatched. Jones' band mate and the road ranger both made contact with Jones but they were unable to get his vehicle started. The road ranger drove away at approximately 2:41 a.m. Jones told his band mate he did not want to leave his drum equipment unattended for fear of it being stolen. Jones' band mate drove away at approximately 2:45 a.m. He was the last person to see Corey Jones alive before Nouman Raja became involved.

Corey Jones placed several calls to the AT&T number for roadside assistance. He made his first call to the number at 2:09 a.m. That call and the next three calls he made to the number were not answered. Jones may have entered the wrong prompts or he hung up the phone before his call was answered. His fifth call was made at 2:45 a.m. This call was successfully connected. Jones' call was on hold for about 26 and a half minutes with music playing in the background. The call was recorded. The audio recording was turned over to investigators. His call was answered at approximately 3:12 a.m. by an operator at the AT&T roadside assistance call center. The first two minutes of the recorded call were uneventful. The operator began obtaining some basic information. Jones appeared to be calm and under his normal faculties, coherently providing details and answering questions in a casual manner. Jones and the call center operator conversed about the trouble Jones was having with his vehicle. During those first two minutes there was no background noise heard from Jones' call. The distinct, persistent sound of Jones' door chimes were suddenly heard at a point a bit more than two minutes after the operator came on the line, indicating Jones had opened his door with his keys in the ignition. The door chimes are clearly heard throughout the remainder of the recording. Nine to ten seconds after the sound of the door chimes are initially heard the recording captures a verbal exchange between Corey Jones and Officer Nouman Raja:

Corey Jones: "Huh?"
 Nouman Raja: "You Good?"
 Jones: "I'm good."
 Raja: "Really?"
 Jones: "Yeah; I'm good."
 Raja: "Really?"
 Jones: "Yeah"

Raja: "Get your fucking hands up! Get your fucking hands up!"

Jones: "Hold on!"

Raja: "Get your fucking hands up! Drop!"

Officer Raja fired three gunshots in rapid succession (within two seconds) immediately after he uttered the word "drop." The call center operator is heard saying "Oh my gosh!" There is a period of silence, except for the pinging door chimes. Approximately ten seconds after the third shot was fired there are three additional shots fired by Raja. This second volley was fired more deliberately, one shot per second. The call center operator is heard again. After the sixth shot is fired the operator said "There's gunshots." The call center operator was the last person to talk to Corey Jones before Nouman Raja arrived.

Nouman Raja was on duty as a police officer when the shooting occurred. He was in plain clothes: sneakers, blue jeans, a tan t-shirt and a tan-colored baseball-type cap with the red letters "CAT" stitched across the front. He was driving a white Ford cargo van with no police markings. There had been a problem with late night auto burglaries in Palm Beach Gardens. Raja was assigned to do surveillance patrol in large parking lots with the goal of locating the burglary suspects. Raja's immediate supervisor, a sergeant, provided a statement to investigators. He said he explained the duties and responsibilities of the surveillance assignment to Officer Raja. The sergeant said he told Raja to wear his tactical vest with police markings on it when he worked the assignment "for safety reasons" and to "identify yourself as a police officer." Officer Raja was not wearing the vest when he exited the unmarked van. The vest, with his police radio in one of the pockets, was on the van's floorboard next to the driver's seat when the shooting occurred.

Officer Raja used his personal cell phone to call 911 after the shooting occurred. His call was placed approximately 33 seconds after he fired his last round (shot #6). As the 911 call connected, before the 911 operator could answer, Raja is heard as he yells: "Drop that fucking gun right now!" The 911 operator answered the line and he and Raja began communicating. Officer Raja gave his location. He said he had shot a person. He requested fire-rescue. He said he "lost contact" with the person he shot, meaning he did not know where the person was located. The 911 operator asked for a description of the person. Raja's reply: "I'm, black male wearing all black, dreads, had a silver handgun in his right hand. I came out, I saw him come out with a handgun. I gave him commands. I identified myself and he turned, pointed the gun at me, and started running. I shot him." Raja also said the person he shot had been "hit," meaning shot, "at least three to four times."

Additional police officers were dispatched to Raja's location. Among the officers who responded was the senior sergeant, the highest ranking officer working at the time. The senior sergeant had served with the police department for 25 years when this shooting occurred. The senior sergeant provided a sworn statement to investigators. He described his actions of responding to the scene and meeting with Officer Raja. The senior sergeant was intent on finding the wounded man as quickly as possible. Officer Raja led the senior sergeant and other officers into a stand of trees in the grassy area adjacent to the off-ramp; the area where Raja said he last saw the man. The officers, with Raja directing them, found Corey Jones' body at 3:25 a.m. The body was approximately 192 feet (64 yards) to the north from the back of Jones' vehicle. Paramedics were summoned and they pronounced Jones dead at 3:32 a.m. Officer Raja said Jones had been armed with a handgun. The handgun was not found near the body. The senior sergeant said his next goal was to find the handgun. He called for a canine officer to do an "article search," using a police dog to search the dark area for the handgun. The senior sergeant explained why he called for the canine team to search for the handgun: "Based on Officer Raja advising me he believed the subject had thrown a silver-colored handgun in the tall grass near the rear of the suspect's vehicle." A canine team responded and began searching from the rear of Jones' vehicle. The chrome .380 handgun owned by Corey Jones was found almost immediately. The handgun was in the grass about 72 feet (24 yards) from the rear of Jones' vehicle.

Nouman Raja fired six shots at Corey Jones. The six casings were recovered at the scene and all six of them were forensically matched to the handgun used by Raja. Raja used his personally-owned Glock .40 caliber pistol to fire the shots because his department-issued duty firearm was in its holster inside the van.

Three of the shots fired by Raja struck Jones' body. One shot entered the left arm near the elbow. One shot entered the back of the upper right arm. Dr. Juste said neither of the arm wounds would have been fatal. The bullet wound to Jones' chest is the one that caused his death. The bullet entered at the right side of the chest and traveled into the body, passing through a section of the heart and both lungs. The projectile was recovered under the skin of Jones' left shoulder. Another projectile was located in a small tree. The tree from which this projectile was recovered was 15 feet away from Jones' head (in the grassy area where Jones' body was found).

Nouman Raja had 7.5 years of police experience in October of 2015. He was certified by the Florida Department of Law Enforcement as a firearms instructor, emergency vehicle operations instructor, and as a general topics law enforcement instructor. Prior to this incident he had taught in excess of 800 class hours at the Palm Beach State College Criminal Justice Institute, the local training academy for law enforcement officers. Despite his experience, his extensive police training, and the direction of a superior officer to wear his tactical vest with police markings on it to clearly identify himself as a police officer, Raja chose to approach Corey Jones' vehicle in a tactically unsound, unsafe and grossly negligent manner. The approach was made at approximately 3:13 a.m. Raja was driving an unmarked white cargo van which no reasonable person would assume was a police vehicle. The van had no emergency lights, police decals or markings of any sort. Raja was dressed in casual clothing which included a cap with the red-colored logo of Caterpillar, Inc., a company best known for its production of earthmoving equipment. Raja did not have a police badge hanging from his neck or any other indicia of police identification on his person. Raja, operating the unmarked van and wearing the clothing previously described, drove the wrong way, northbound, up the southbound off-ramp to approach Jones' vehicle. A reasonable person can only assume the thoughts and concerns Corey Jones was experiencing as he saw the van approaching him at that hour of the morning. Raja did not know Jones was on his phone with the operator at the roadside assistance call center. Raja stopped his van at a perpendicular angle directly in front of Jones' vehicle. The ensuing verbal exchange was captured on the call center recording. At no time during the recording did Raja say he was a police officer. Instead, Raja confrontationally replied by asking the single word "really?" when Jones twice said "I'm good."

Raja's expended bullet casings were recovered at the scene. Raja clearly left the position of cover and safety provided by his vehicle and fired upon Jones as he fled on foot in a northerly direction in the grassy area next to the off-ramp. Jones' chrome .380 caliber handgun was 72 feet (24 yards) from the left rear tire of Jones' vehicle. The fact that ten seconds passed before the second volley of shots was fired is especially relevant because Raja told the senior sergeant at the scene he saw the "subject had thrown a silver-colored handgun in the tall grass near the rear of the suspect's vehicle." Despite this observation, realizing Jones had "thrown" his handgun in the grass near the rear of Jones' vehicle, Officer Raja continued to fire at Jones as he ran away. This is proven by at least one of the gunshot wounds. The bullet that struck Jones' right arm was fired from the rear. Dr. Juste described the trajectory of the right arm wound as "back to front."

The homicide of Corey Jones occurred as a result of Officer Raja's culpably negligent actions previously described in this affidavit. All of the factors must be considered in their totality: the darkness, the early morning hour, the plain white van Raja was driving, the wrong-way approach up the one-way off-ramp, the casual attire worn by Raja, and the position he stopped the van directly in front of Jones' vehicle. Raja did not identify himself to be a police officer during the audio recording previously described. There is no question that Jones ran away from Raja. After Jones' body was found Raja told the senior sergeant he believed Jones threw a silver-colored handgun in the tall grass near the rear of Jones' vehicle. The handgun was in fact found in the area described by Raja. The time gap between the first and sixth shot fired by Raja was 13 seconds. The handgun was only 24 yards away/north from the left rear tire of Jones' vehicle, a distance easily covered in fewer than ten seconds by a frightened, fleeing 31-year-old man weighing 158 pounds (Jones' weight).

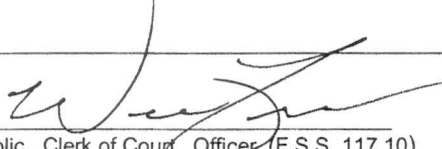
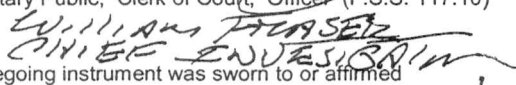
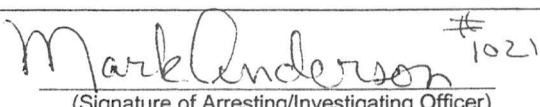
Dr. Juste, the board certified forensic pathologist who performed the autopsy on Jones, believes the fatal chest wound caused such significant trauma, especially to the heart, that Jones would not have been able to continue his flight more than a few yards after the wound was suffered. Jones' feet were the closest parts of his body to his abandoned handgun. The distance between Jones' feet and the handgun he abandoned was 124 feet (41 yards).

Corey Jones' Jimenez Arms .380 caliber firearm was loaded with six (6) rounds of live ammunition in the magazine. The chamber of the pistol was empty. The safety was on, in the "safe" mode. Jones did not discharge any shots from his firearm at the scene. The only expended bullet casings recovered at the scene were the six ejected from Raja's personally-owned Glock pistol. Jones lawfully purchased the Jimenez firearm on 10-15-2015 in Palm Beach County at a business properly licensed to sell firearms. He had owned the firearm for less than 72 hours when he was killed.

There is sufficient evidence and probable cause to conclude Nouman Raja continued to discharge his firearm at Corey Jones after Raja realized Jones no longer possessed a firearm. The intent of discharging his firearm was to kill Corey Jones. The details enumerated in this affidavit cause this affiant to believe there is probable cause to arrest Nouman Raja for the below-listed felony offenses:

Count Number One: On October 18, 2015, in the County of Palm Beach, State of Florida, Nouman Raja unlawfully and by his own acts of culpable negligence, killed Corey Jones, a human being, by shooting him with a firearm without lawful justification. Therefore, your affiant believes probable cause exists to charge Nouman Raja with the offense of Manslaughter with a Firearm, contrary to Florida Statute 782.071(1).

Count Number Two: On October 18, 2015, in the County of Palm Beach, State of Florida, Nouman Raja attempted to commit First Degree Murder upon Corey Jones by unlawfully shooting him twice, but not causing death, and attempting to shoot him an additional three times with a firearm. Therefore, your affiant believes probable cause exists to charge Nouman Raja with the offense of Attempted First Degree Murder with a Firearm, contrary to Florida Statutes 777.04(1) and 782.04(1)(a)(1) and 775.087(1)and(2).

 Notary Public, Clerk of Court, Officer (F.S.S. 117.10)  CHIEF INVESTIGATOR	 #1021 (Signature of Arresting/Investigating Officer)
The foregoing instrument was sworn to or affirmed and subscribed before me this <u>1</u> Day of <u>June</u> 20 <u>16</u> By	Mark Anderson #1021 Deputy Chief Investigator State Attorney's Office 15 th Judicial Circuit
Who is personally known to me and/or produced identification.	
STATE OF FLORIDA COUNTY OF PALM BEACH	