

COUNTY OF McLENNAN }

COMPLAINT

THE STATE OF TEXAS }

THE UNDERSIGNED AFFIANT, BEING A PEACE OFFICER UNDER THE LAWS OF THE STATE OF TEXAS AND BEING DULY SWORN, ON OATH MAKES THE FOLLOWING STATEMENTS AND ACCUSATIONS

I, Ben Toombs, a licensed peace officer in the State of Texas and employed by the Hewitt Police Department and hereafter referred to as the Affiant, do solemnly swear that I have reason to believe and do believe that Matthew Dee Baker, a white male, date of birth 09-07-1971 hereafter referred to as the Defendant, committed the offense of Murder on or about 04-07-2006 in McLennan County, Texas. On or about that date, the Defendant intentionally or knowingly committed the offense of Murder by causing the death of Kari Lynn Baker by using prescription and/or over-the-counter sleeping medication and alcohol to render her defenseless and then using a pillow or similar item to suffocate her.

IT IS THE BELIEF OF YOUR AFFIANT THAT THE ABOVE SUSPECTED PARTY HAS COMMITTED THIS CRIMINAL ACT IN VIOLATION OF THE LAWS OF THE STATE OF TEXAS, AND AFFIANT HAS PROBABLE CAUSE FOR SAID BELIEF BY REASON OF THE FOLLOWING ACTS, TO WIT:

My name is Ben Toombs and hereafter referred to as the Affiant. Your Affiant is a Certified Peace Officer in the State of Texas and presently employed as a Criminal Investigator with the Hewitt Police Department in Hewitt, Texas. Your Affiant has been a police officer for seven (7) years and during that time, your Affiant has investigated dozens of felony crimes including the crime of homicide. Your Affiant is currently investigating the death of a woman from Hewitt, Texas, named Kari Lynn Baker. Kari Lynn Baker died on or about April 7, 2006, at her home in Hewitt, Texas. In preparing this affidavit, Affiant has interviewed individuals connected with the case, has reviewed police reports prepared by the City of Hewitt, Texas, and has spoken with experts regarding forensic matters.

At the time of her death, Kari Baker was a schoolteacher in the Midway Independent School District located in Central Texas. She was married to the Defendant, a local Baptist preacher. Sometime in early 2006, the Defendant apparently became interested in having a relationship with a woman named Vanessa Bulls who was the daughter of the music director of the Crossroads Baptist Church where the Defendant preached. In addition to this job, the Defendant worked as the Chaplain at the Waco Center for Youth. Records show that the Defendant's cellular telephone contacted the home where Vanessa Bulls lived on dozens of occasions between January and April 2006. According to Vanessa Bulls, the Defendant would call her once or twice a day from his cellular telephone or his work telephone. Vanessa Bulls indicated that she believed that the Defendant was "interested" in her. Investigation by your Affiant revealed that within days after the death of Kari Baker, the Defendant was with a woman who matched the description of Vanessa Bulls and the two of them were in jewelry store in Richland Mall in Waco, Texas shopping for engagement rings.

Computer records provided by the Waco Center for Youth reveal that, in early March 2006, the Defendant began to seek internet sites dealing with drug overdose and with specifically with prescription drugs. On March 9, 2006, the Defendant did a computer search regarding "overdose by sleeping pill." Also on March 9, 2006, the Defendant did a computer search for the prescription drug *Ambien*. As Affiant will describe later, it was determined that Kari Baker had *Ambien* in her system at the time of her death. On March 20, 21-and 23, 2006, the Defendant visited numerous internet sites that which sold prescription medication. On March 26, 2006, at 1:12 p.m., the Defendant visited an internet site known as "prescriptiondrugplanet." Two (2) minutes later, at 1:14 p.m., a site known as "pharmbilling" was connected to the Defendant's computer. Your Affiant believes that "pharmbilling" is a service, which handles payment for prescription medication ordered from an internet site. In addition, on March 23, 2006, at 1:28 p.m., the Defendant's computer at the Waco Center for Youth was connected to an internet site registered as "SecureRxCart." Your Affiant believes that this is another indication of a purchase by the Defendant of prescription medication ordered from an internet site.