

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

POLICE NO. :	17-095837
PROSECUTOR NO. :	095447530
OCN:	

[illegible]

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 10, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others knowingly caused the death of Jennifer L. Zimmerman by shooting her and the defendant is further given notice that should the State submit murder in the second degree--felony under Section 565.021(2), it will be based on the death of Jennifer L. Zimmerman as result of the perpetration of the class B felony attempted robbery in the first degree under section 565.025 RSMo, committed by the defendant.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

State vs. Deaundre J. Brown

Count II. Armed Criminal Action (571.015-001Y19755213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about November 10, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of murder in the second degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count III. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 10, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others knowingly caused the death of Victor Portillo by shooting her and the defendant is further given notice that should the State submit murder in the second degree-- felony under Section 565.021(2), it will be based on the death of Victor Portillo as result of the perpetration of the class B felony attempted robbery in the first degree under section 565.025 RSMo, committed by the defendant.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

State vs. Deaundre J. Brown

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

Count IV. Armed Criminal Action (571.015-001Y19755213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about November 10, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of murder in the second degree charged in Count Two, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count V. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 10, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others knowingly caused the death of Yessenia Ahumada by shooting her and the defendant is further given notice that should the State submit murder in the second degree-- felony under Section 565.021(2), it will be based on the death of Yessenia Ahumada as result of the perpetration of the class B felony attempted robbery in the first degree under section 565.025 RSMo, committed by the defendant.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

State vs. Deaundre J. Brown

Count VI. Armed Criminal Action (571.015-001Y19755213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about November 10, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of murder in the second degree charged in Count Three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeremy J. Baldwin

Jeremy J. Baldwin (#62734)
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WITNESSES:

1. DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127
2. PO Colton Evans, 1125 Locust, Badge# 5648, Kansas City, MO 64106
3. [REDACTED]
4. PO Jerry R. Richardson, 1125 Locust, Kansas City, MO 64106
5. CST George Santoro, 2645 Brooklyn, Kansas City, MO 64127
6. DET Mark A. Slater, 1125 Locust, Kansas City, MO 64106
7. DET Christopher S. Smith,

PROBABLE CAUSE STATEMENT FORM

Date: 08-20-2018

CRN: 17-95837

I, Det. Christopher Smith #4672

(Name and identify law enforcement officer, or person having information as probable cause.)

knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 11-10-2017, at 4900 E. 17th Street in
(Date) (Address)

Kansas City, Jackson Missouri Deaundre J. Brown
(County) (Name of Offender(s))

B/M, 11-04-1990, 5'11" 150 lbs, BLK/BRO committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 11-10-2017 at approximately 1000 Hours, Officers of the Kansas City Missouri Police Department were dispatched to 4900 E. 17th Kansas City, Jackson County, MO 64127 on a reported shooting. Upon arrival officers discovered two deceased victims inside the residence. A third victim was located in the living room of the residence who was transported to an area hospital where she succumbed to her injuries and was declared deceased. The calling party was determined to be the deceased female who had been transported to an area hospital from the living room of the residence. A search warrant was obtained for the address.

A witness was contacted at the scene who stated he believed one of the three deceased victim's was his girlfriend, Yessenia Ahumada w/f 04-27-1992. The witness provided the name of a potential suspect. He identified (**Deaundre Brown b/m 11-04-1990**) as being an ex-boyfriend of Ahumada's. Ahumada had recently started talking to **Brown** via Facebook Messenger and telephone calls. The witness stated several years ago when he and Ahumada first began dating, he met **Brown** through her. The witness stated he and Ahumada met **Brown** at the BP gas station located at 5405 E. Truman Road the previous night, around midnight. **Brown** and another unknown subject were occupying a white Chevrolet sedan at that time. **Brown** and the unknown subject then followed Ahumada and the witness, who were occupying a gold Chevrolet Malibu to 4900 E. 17th Street. While at the address Ahumada introduced **Brown** to Victor and Jennifer (Victor Portillo h/m 05-27-1987 and Jennifer Zimmerman w/f 05-22-1987, victim's #2 and #3). The witness described that Ahumada, Portillo, Zimmerman, **Brown** and himself were together in the living room of the residence. The witness stated he was present for a conversation between Portillo and **Brown** regarding **Brown** purchasing approximately 20 lbs of marijuana from Portillo for \$34,000 dollars. During that conversation Portillo told **Brown** he didn't have that much, but if he (Brown) would come back in the morning at 9:30am, Portillo would sell it to him at a discounted price of \$30,000 dollars. The witness stated Ahumada was to receive \$2,000 dollars for setting up this sale. Later that night after returning home, the witness told Ahumada he didn't feel comfortable with her participating in this deal. When he went to bed, the witness stated he was confident he had convinced Ahumada not to follow through with participating in the meeting at 9:30am the next morning.

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The following morning, the witness stated he received a telephone call at approximately 1000 hours from Ahumada's employer, who stated she left work at approximately 0900 hours and had not returned to work. The witness stated he then responded to the address, where he observed the police presence as well as Ahumada's gold Chevrolet Malibu. The witness was able to provide detectives with cellphone numbers associated to Ahumada and **Brown**.

Detectives retrieved surveillance video from several locations in close proximity of the crime scene, as well as the BP gas station located at 5405 E. Truman Rd. A review of the BP surveillance video reveals on 11-10-2017 at approximately 0018 hours (the night before), a White Chevy Cruze bearing MO license plate of AJ2P6R is observed backed into a parking spot at 5405 E. Truman Road, a subject similar in appearance to **Brown** is observed exiting the passenger side of the Cruze and enters the store. **Brown** purchases a soft drink and returns to the passenger side of the Cruze. At approximately 0024 hours Ahumada's gold Chevy Malibu is observed on surveillance video pulling into the parking lot of the BP. The gold Malibu doesn't stop or park and continues to the east side of the lot. The white Chevy Cruze is observed following the Malibu and both vehicles exit the lot traveling east on Truman Road. This activity is consistent with the witness' statement.

At approximately 0932 hours (the following morning), Ahumada's gold Malibu arrives on surveillance video at the BP again. Ahumada is observed exiting the driver's side of the Malibu and entering the store. A similar white Chevy Cruze as observed in earlier surveillance video parks in the lot east of the BP at the Laundromat (5413 E. Truman Road). At approximately 0935 hours the gold Malibu is observed leaving the lot to the east and the white Chevy Cruze pulls behind it. Both cars are observed leaving east on Truman Road. Subsequent surveillance video was obtained from Hogan Elementary School located at 5000 E. 17th Street, Kansas City, Missouri. A review of the surveillance video reveals at approximately 0937 hours a gold Malibu and white Chevy Cruze are observed traveling west on 17th street and both turning north on Poplar. Additional residential surveillance video captures the gold Malibu turning from northbound on Poplar to westbound on 16th Street. A white in color sedan can be seen following the same direction as the Malibu. Detectives observed Ahumada's gold Malibu parked on Chelsea Ave (one block west of Poplar), facing south. An area canvas revealed an additional witness who described hearing the sound of gunshots. When the shooting stopped he looked out of his window and observed a white sedan parked in the middle of the street in front of 4900 E. 17th. He stated the vehicle sped away at an accelerated rate of speed traveling westbound on 17th.

Court orders were obtained to retrieve cellphone records for Ahumada and **Brown**. Cellphone records show Ahumada and **Brown** in communication with one another before and after the first meeting at the BP gas station the previous night described by the witness. There is additional communication between Ahumada and **Brown** on 11-10-2017 beginning at 0754 hours and ends 0934 hours. Additionally, Ahumada's cellphone was recovered at the crime scene and the data was extracted from the device. In addition to the exchange of calls between Ahumada and **Brown**, there were multiple text messages. One text sent on 11-09-2018 at 4:51:11pm from the telephone number associated to Brown reads: "I dnt wanna go over there with that much money I only know you if whi they are so can I go check it out then we can meet somewhere when u get off tomorrow." A second text message from **Brown** to Ahumada was received on 11-09-2018 at 9:37:48pm which read: "U still meeting me when u get off right." An outgoing text message response from Ahumada to **Brown** read: "yep."

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The cellphone records were then submitted for mapping to the Cellular Analysis Survey Team (CAST). A result of that mapping indicates **Brown's** cellphone utilized a cell site and sector that would likely provide coverage to the BP gas station and the crime scene on 11-10-2017 between 0004 hours and 0052 hours the previous night. **Brown's** cellphone used the same cell site and sector again on 11-10-2017 0715 hours and 0953 hours just before the 911 call. **Brown's** cellphone records indicate no further activity after 1058 hours.

Printed Name Detective Christopher Smith Signature /s/ Det. Christopher Smith #4672

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.