IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

POLI	CE NO.:	18-0693	365
PROSECUT	OR NO.:	0954480	044
	OCN:		
STATE OF MISSOURI,)
,	PLAIN	TIFF,)
vs.)
)
BRANDON D. JONES)
1006 Grand Ave.) CASE NO. 1816-CR
Kansas City, MO 64106) DIVISION
DOB: 07/18/1995)
Race/Sex: B/M)
)
	DEFENI	DANT.)
	COMP	LAIN	Γ

Count I. Murder 1st Degree (565.020-001Y19840911.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about September 8, 2018, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Gary Starr by shooting him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

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 September 8, 2018, in the County of Jackson, State of

State vs. Brandon D. Jones

Missouri, the defendant committed the felony of murder in the first 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 first 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.

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/ Jeannette Wolpink
Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street, 7M
Kansas City, MO 64106
(816) 881-1776
jwolpink@jacksongov.org

WITNESSES:

- 1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
- 2. PO Nicholas M. Cardona, 1125 Locust, Kansas City, MO 64106

State vs. Brandon D. Jones

- 3. DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106
- 4. PO Jared Fugate, 1125 Locust, Kansas City, MO 64106
- 6. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
- 7. PO Kaylee D. Lull, 1125 Locust, Kansas City, MO 64106
- 8. PO Jeffrey D Peacock,
- 9. DET James H. Price, 1125 Locust, Kansas City, MO 64106
- 10. Gary Starr,
- 11. MO 64106
- 12. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106
- 13.

Date: _09-14-2018				CRN:	18-069365	
I, Detective Bonita Cannon, #4585, K (Name and identify law enforcement office						
knowing that false statements on this fo	rm are puni	shable by 1	aw, state tha	t the facts of	contained her	ein are true
I have probable cause to believe that on	09/08/20	18	, at 1700	E. 18 th Str	eet	i
	(D	Date)		(A	Address)	
Kansas City, Jackson	Missouri	Brandon	D. Jones			
(County)	_			ame of Offen	ider(s))	
B/M 07-18-1995	,		committe	d one or m	ore criminal	offense(s)
(Description of Identi	ty)			d one of in	ore erminar	offense(s).
The facts supporting this belief are as for On 09-08-2018 officers of the Kansas Ci		Police Der	partment wer	e dispatche	ed to 1700 E	18th Street
on a reported shooting.	., 1,11000011	r once Dep	yar tillolle Wel	o dispatori	A 10 1700 L.	Total Bareet
Upon their arrival off duty officers were KCFD EMS responded to the scene and Examiner ruled the victim's death a hom	pronounced	the victim	deceased. T	he Jackson		
Witness #1 stated he and the victim alon Street. Witness #1 stated they parked in the line for the Juke House on the west side when four males approached the same line school with two of the males- "Brandon" of the males (he did not know) back in Months.	front of the of the buildine on foot. V	Gem Theat ing. Witness #1 The vict	er located at ss #1 stated to stated they (1615 E. 18 hey were in he and the	8th Street. The line less that victim) attended	ney got in the an 10 minuted and high
Witness #1 stated the males "looked sho past them as if they were getting in the st back to having a conversation with the v	ame line. W	itness #1 st				
Witness #1 stated he heard shots and two photograph of the males that approached Brandon Jones. He also identified the ma	on foot, wi	tness #1 ide	entified the r	nale in the		
Witness #1 was shown a single photograph of Witness #2 stated Witness #1 was shown a screenshot of 3 Brandon Jones . He further stated the madd not know his name.	while looki males (prov	ing at the plaided by the	hotograph of e family of tl	ne victim),	has long of which he	g dreads." identified

CRN	18-069365	
-----	-----------	--

Witness #2 stated he was with witness #1 and the victim. He parked his vehicle in front of the Gem Theater. The three of them stood in line waiting to get into the Juke House, 1700 E. 18th Street.

Witness #2 stated while doing so the victim uttered, "I'm fonking (having or had issues) with them, when 3 or 4 males approached the same line they were in. The victim also told witness #2 he was considering not going into the Juke House. Witness #2 stated the 3 or 4 males passed them and within a few moments he heard gunshots. Witness #2 stated the gunshots came from behind them.

Witness #2 provided a screenshot of the males the victim had a physical altercation with; however he did not know any of their names.

Witness #3 stated she was standing in line in front of the victim, witness #1 and #2. She stated she observed 4 males approach and linger near the intersection. She further stated the males split up (half on sidewalk and half in the street) walking passed them as if they were getting in the line.

Witness #3 stated when the males returned to the corner there weren't as many as she first observed. She stated the area was "peaceful with good music and good weather" when all of a sudden she heard gunshots. She stated her vehicle was to the north of her. She stated she turned to run to her vehicle when she observed the victim on the ground, the suspect, **Brandon Jones** (lighter complexion, smaller build with light grey or light blue clothing on) shooting the victim. She stated **Brandon Jones** had his hair in a "man bun."

Witness #3 stated **Brandon Jones** was standing in the street at an angle from the victim when she witnessed him shooting the victim.

During this investigation the city traffic cameras were viewed and a white Buick Regal, a red Ford Mustang and a dark colored Audi Q5 were observed in the area before parking and the 4 males exiting. The Buick Regal and Audi Q5 are registered in DOR to **Brandon Jones**. The red Mustang was rental vehicle, rented by

The video footage shows the victim and witnesses in line for the Juke House. The four males (**Brandon Jones**, approach the same line the victim was in before walking back to the intersection.

The video surveillance shows **Brandon Jones** and approach the line a second time at which time walk West on 18th Street. **Brandon Jones** runs

on 09-12-2018 at 1830 hours was taken in custody and transported to Police Headquarters. was advised of his Miranda Rights at 1937 hours. signed the Miranda Waiver at 1938 hours.

Stated he went to the Juke House with Brandon Jones and two other males identified as and As they approached the front of the Juke House, Brandon Jones uttered, "I don't want to go in there anymore, go get the car." stated as he walked away from Brandon Jones he heard a gunshot. stated he stopped walking, turned around and saw the victim fall and Jones firing a handgun.

southbound from the scene.

CRN_18-069365

stated he continued to the car, got into the vehicle (Audi Q5) at which time Brandon Jones approached and got into the vehicle with him. stated Jones told him to take him home; he then drove Brandon Jones to 1006 Grand. While enroute he asked Brandon Jones why he shot the victim, to which Jones laughed and said he didn't shoot the victim, he ran. stated he asked Brandon Jones again why, at which time Brandon Jones uttered, "Fuck that nigga."
was shown a still photograph from the surveillance video. Brandon Jones and a male whom he knows as (who has been identified as after he dropped Brandon Jones off at 1006 Grand, Brandon Jones told him to go back and get his Buick. stated he returned to the scene in the Mustang with to pick up the Buick.
On 09-13-2018 at 1000 hours Summers was taken into custody and transported to Police Headquarters was advised of his Miranda Rights via the Miranda Waiver at 1051 hours. signed the Miranda Waiver and agreed to speak with detectives at 1052 hours.
stated he is the one who rented the Mustang and he is the only one who drives the Mustang, stated he went to the Vine District with "Bam" identified Brandon Jones , identified as (Brandon Jones cousin identified as
stated on that particular night he was not driving the Mustang, was. stated when asked he did not hear the shooting and was told by stated when he got to his vehicle he blacked out. then stated he did not find out about the shooting until the following day.
On 09-14-2018 at 1020 hours was taken into custody. He was transported to Police Headquarters. was advised of his Miranda Rights via the Miranda Waiver at 1056 hours. stated he was intoxicated and doesn't remember being anywhere but, with Summers all evening.
denied knowing Brandon Jones and a still shot from video surveillance. The also identified himself in a photograph with Brandon Jones and the still shot from video surveillance.
stated he did not remember if there was a conversation before the shooting. He stated when he walked back to the line; he was getting in the line to go into the club. He stated he heard gunshots and ran from the scene and went home.
On 09-10-2018 the Audi Q5 bearing Missouri license UM0P8B registered to Brandon Jones , was detected by an automated license plate reader at 21 st Street and Harlem Avenue in Berwyn Illinois.
Brandon Jones has several family members in Illinois.

CRN 18-069365

		of the homicide. The license plate, UM0P8B City area since 09-08-2018 (date of the
Printed Name Det. Bonita Cann The Court finds probable cause an		
Circuit Court o	Judge	County, State of Missouri.