

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	18-003077
PROSECUTOR NO. :	095448720
OCN:	CW005489

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JA'JUAN M BURNETT)	
8633 E Utopia Parkway, #6)	CASE NO. 1816-CR
Kansas City, MO 64138)	DIVISION
DOB: 06/04/2000)	
Race/Sex: B/M)	
[REDACTED])	
)	DEFENDANT.

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 23, 2018, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. Currency owned by Family Dollar, and in the course thereof defendant was armed with a deadly weapon.

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 II. Armed Criminal Action (571.015-001Y19755299.0)

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 October 23, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

State vs. Ja'Juan M Burnett

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/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
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WITNESSES:

1. LT Paul Beitling, 10000 E. 59th Street, Raytown, MO 64133
2. CPL Gary Davis, 10000 E. 59th Street, Raytown, MO 64133
3. Family Dollar - Blue Ridge Blvd., Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. PO Evan Hartenstein, 10000 E. 59th Street, Raytown, MO 64133
5. PO Larry Jackson, 10000 E. 59th Street, Raytown, MO 64133

6. [REDACTED]

Probable Cause Statement Form

Date: 10/24/18

Report: 18-3077

I, Detective L Jackson, 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 10/23/18 at 5242 Blue Ridge Blvd., Raytown, Jackson County, MO., 64133, Ja'Juan M. Burnett, B/M, 06/04/00, [REDACTED] committed one or more criminal offense(s).

The facts supporting this belief are as follows: On 10-23-18, at approximately 1453 hours, Captain Beitling was dispatched to Family Dollar, 5242 Blue Ridge Boulevard, Raytown, MO 64133, in reference to a possible robbery that had just occurred.

Upon arrival, he contacted employees [REDACTED], and [REDACTED]. [REDACTED] and [REDACTED] confirmed that a robbery had just occurred and advised that the store manager, [REDACTED], was chasing the suspect toward the north.

[REDACTED] advised that at about 1450 hours he was stood outside in front of the store's front doors, and was approached by an unknown light-skinned or "mixed" race male; dressed in black pants, black gloves and a black hoodie with the hood up over his head and the draw-strings pulled tight; as to conceal the majority of his face. [REDACTED] reported that the male held and partially concealed a silver, semi-auto handgun in his hoodie's front pocket. [REDACTED] stated the suspect directed him inside the store, over to the register, and demanded that he open the register. [REDACTED] stated he felt something hard pressed against his back and assumed that it was the handgun. [REDACTED] stated he opened the register, and that the suspect removed most of the currency. [REDACTED] stated that the suspect left the store through its front door and ran off toward the north. [REDACTED] stated Ms. [REDACTED] chased after the suspect.

[REDACTED] concurred with [REDACTED] statement. [REDACTED] added that he stood out of the suspect's way with his hands up during the robbery.

Sgt. Davis responded to the area and searched for the suspect. Detective Hartenstien and Ms. [REDACTED] arrived at the store; Ms. [REDACTED] stated that she was near the front of the store when she saw the unknown male suspect and [REDACTED] entering the building. Ms. [REDACTED] stated that she did not believe that they were actually being robbed at first, and repeatedly told the suspect to remove his hood from his head.

Ms. [REDACTED] stated that she eventually understood that they were being robbed, immediately locked the store's front doors and called 911 with negative success. Ms. [REDACTED] stated she saw the suspect leave the store and chased after him. Ms. [REDACTED] stated she never lost sight of the suspect while chasing him, and saw the suspect removing his clothing (black sweat hooded sweat shirt and black pants) while fleeing from the scene; eventually wearing only blue shorts with no shirt and unknown shoes. Ms. [REDACTED] stated that the suspect ran towards the front door of an unknown nearby residence. Ms. [REDACTED] stated she did not see the suspect enter the residence, or make contact with anyone inside. Ms. [REDACTED] counted the cash drawer that the suspect removed the money from and discovered it be short approximately \$290.10.

Sergeant Davis advised he observed and detained an unknown male closely matching the suspect's description, at the intersection of 48th St. and Sterling, Kansas City, Jackson County Missouri. Detective Hartenstein transported Ms. [REDACTED] to Sergeant Davis' location. Ms. [REDACTED] positively identified JaJuan Burnett to be the suspect. Mr. Burnett was transported to Headquarters for processing.

At approximately 9:34PM, I contacted Mr. Burnett, read him his Miranda Rights, obtained a signed Miranda Waiver form from him and interviewed him. Mr. Burnett vehemently denied committing the robbery. A criminal history check was performed on Mr. Burnett and showed him to not have a criminal history.

An area canvas was conducted and a load silver pistol magazine, and black sweat hoodie and pants were found. The magazine and sweat suit were in scattered along the path traveled by Mr. Burnett. The hoodie contained a single \$20 bill in its front pocket.

Name: Larry Jackson

Signature: /s/ Larry Jackson

