


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

POLICE NO. :	18-027697
PROSECUTOR NO. :	095449225
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
KENNETH G. FLOWERS)	
4337 College Ave.)	CASE NO. 1816-CR
Kansas City, MO 64130)	DIVISION
DOB: 06/30/1999)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

COMPLAINT

**Count I. Unlawful Use of Weapon - Subsection 9 - Shoot at/from Motor Vehicle, at
Person, Motor Vehicle or Building, Resulting in Death or Injury
(571.030-015Y20145299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **Class A Felony of Unlawful Use of a Weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about April 14, 2018, at 6928 Paseo Boulevard, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another knowingly discharged a firearm at a habitable structure, namely the residence located at 6928 Paseo, and and as a result of the above described conduct, Kindrea Brown suffered injury or death.

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.

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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 April 14, 2018, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another, committed the felony of Murder in the Second Degree charged in Count III, 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 - Felony Murder - During Perpetration/Attempted Perpetration/Flight from Perpetration of a Felony, a Person Dies (565.021-003Y19840999.0)

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 April 14, 2018, in the County of Jackson, State of Missouri, Kindrea Brown was killed by being shot as a result of the perpetration of the class A felony of Unlawful Use of a Weapon under Section 571.030, RSMo, committed by the defendant either acting alone or purposefully in concert with another, on or about April 14, 2018, in the County of Jackson, State of Missouri.

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

Count IV. 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 April 14, 2018, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another, committed the felony of Unlawful Use of a Weapon charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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.

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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/ Sarah A. Castle
Sarah A. Castle (#64770)
Assistant Prosecuting Attorney
415 East 12th Street
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Kansas City, MO 64106
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WITNESSES:

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
8. PO Phillip K. DiMartino, 1125 Locust, Kansas City, MO 64106
9. DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106
10. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
11. PO Jeffrey D Peacock, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: November 20th, 2018

CRN: 18-027697

I, Det. Leland Blank #5023
(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 April 13th, 2018, at 6928 Paseo in
(Date) (Address)

Kansas City, Jackson Missouri Kenneth G. Flowers
(County) (Name of Offender(s))

B/M 6-30-1999 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On April 13, 2018 at 11:51 p.m. Officers of the Kansas City, Missouri Police Department were dispatched to 6927 Paseo on a sound of shots call. Officers responded but were unable to locate any scene.

On April 14, 2018 at 3:30 a.m., Officers of the Kansas City, Missouri Police Department were dispatched to 6928 Paseo on an EMS call of a cardiac arrest. Upon arrival they discovered that the victim, Kindrea Brown, was deceased due to apparent gun shot wounds. Evidence showed apparent bullet holes in the wall of her bedroom and shell casings were found outside of the house. Four other family members were inside the house at the time of the shooting. They all reported hearing shots outside the house around 11:30 p.m. .40 caliber and 9mm shell casings were found at the scene.

 , the victim’s brother, was upstairs and observed a party shooting at the back of his house. He checked on his family and everyone seemed ok. did not call 911 and went back to bed. At approximately 3:00 AM woke to his grandmother screaming in the house, after she discovered Kindrea Brown had been shot. denied any knowledge of who may be responsible for the victim’s death.

The Kansas City, Missouri Police Department Crime Lab determined the shell casings came from three different firearms. On June 26, 2018 detectives also received a DNA CODIS hit from the .40 caliber shell casings recovered from the area behind 6928 Paseo. The casings were found to have major and minor contributors. The major DNA was identified as the DNA of Flowers at the rate of 19 septillion and the minor was identified as the DNA of at the rate of 17 trillion.

 was shown a single photo of Flowers and denied knowing Flowers. However upon reviewing the Facebook page of , detectives observed a post on February 27, 2018 that stated

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(I cant take "Ken Flowers" serious with an emoji face). A search warrant was obtained for ██████s and Flower's Facebook data. Both showed a private messaging conversation that occurred on February 27, 2018. During that conversation Flowers called ██████ a "rat". Flowers was found to be having conversations with several people trying to sell both a .40 and a 9mm handgun after the homicide. Flowers provided his phone number multiple times to parties on Facebook messenger both before and after the homicide.

██████████ has a twin brother ██████████. Both were on Jackson County House Arrest with pending robbery charges at the time of the homicide. Two other parties involved in the robbery have since plead guilty and been sentenced. It is believed Flowers targeted ██████████ because he provided a statement to detectives during the robbery investigation that implicated the other two defendants.

A recorded jail phone call from March 17, 2018 was located and Flowers can be heard telling another party, "The twins are rats. I've been tripping with that nigga, won't get off my Insta". "Insta" is slang for Instagram.

On May 26, 2018 Kenneth Flowers was the front seat passenger in a vehicle during a car check. ██████ was the driver of the vehicle. A .40 caliber Glock handgun was found underneath the driver's seat of the vehicle. Another Glock .40 caliber handgun was found underneath Flowers' seat. The gun underneath the driver's seat was tested and found to be one of the guns used at the homicide scene. It was also determined that it was the firearm that expelled the casings on which Flowers' and ██████ DNA were found.

Flowers' cell phone records revealed that his phone was in the area of the crime scene at 11:53 p.m., two minutes after the homicide. The phone then moved to the area of 43rd and College where Flowers stated he lived.

On November 19, 2018, Flowers was taken into custody at 11948 Manchster. Flowers was transported to Police Headquarters for questioning. After being read his Miranda Rights he admitted to having had a dispute with ██████████ on social media and admitted to having had an argument with ██████ over the instant messenger on Facebook. Flowers admitted his phone number was the same number he provided parties on Facebook messenger. Flowers denied being involved in the homicide.

Printed Name Det. Leland Blank Signature /s/Det. Leland Blank

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

Judge

Circuit Court of _____ County, State of Missouri.