

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

<b>POLICE NO. :</b>	18-092111
<b>PROSECUTOR NO. :</b>	095449457
<b>OCN:</b>	HR003206

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ANTHONY ESKRIDGE</b>	)	
<b>11208 Donnelly Ave.</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64134</b>	)	<b>DIVISION</b>
<b>DOB: 12/08/1994</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2<sup>nd</sup> 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 November 29, 2018, in the County of Jackson, State of Missouri, Darian Jackson was killed by being shot as a result of the attempted perpetration of the Class A Felony of Robbery in the First Degree under Section 570.023, RSMo committed by the defendant either acting alone or purposefully in concert with another, on or about November 29, 2018, in the County of Jackson, State of Missouri.

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.

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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 November 29, 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 I, 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. 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. Attempted Robbery - 1<sup>st</sup> Degree (570.023-001Y20171299.1)**

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 B Felony of Attempted Robbery in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 29, 2018, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another, attempted to forcibly steal a firearm in the possession of [REDACTED] by demanding the gun from [REDACTED], which was a substantial step toward the commission of the offense of Robbery in the First Degree, and done for the purpose of committing such Robbery in the First Degree, 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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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**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 November 29, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Attempted Robbery 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. 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 V. Assault 1<sup>st</sup> Degree or Attempt - Serious Physical Injury or Special Victim (565.050-001Y19841399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 29, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] by shooting [REDACTED].

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 VI. 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 November 29, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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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. 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 VII. Assault 1<sup>st</sup> Degree or Attempt (565.050-002Y19791399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class B Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 29, 2018, in the County of Jackson, State of Missouri, the defendant shot [REDACTED], and such conduct was a substantial step toward the commission of the offense of Assault in the First Degree of [REDACTED], and was done for the purpose of committing such assault.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

### **Count VIII. 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 November 29, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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. 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.

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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/ Sarah A. Castle*  
Sarah A. Castle (#64770)  
Assistant Prosecuting Attorney  
415 East 12th Street, 11th Floor  
Kansas City, MO 64106  
(816) 881-3517  
scastle@jacksongov.org

**WITNESSES:**

1. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO
2. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO
3. SGT Cliff Balicki, 1125 Locust, Kansas City, MO 64106
4. PO Stephen M. Berg, 1125 Locust, Kansas City, MO 64106
5. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
6. PO Jacob Bustamante, 1125 Locust Street, Kansas City, MO 64106
7. [REDACTED]
8. SGT Martin A Cobbinah, 1125 Locust, Kansas City, MO 64106
9. PO Jackson Colwell, 1125 Locust, Kansas City, MO 64106
10. SGT Andrew G. Dorothy, 1125 Locust, Kansas City, MO 64106
11. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
12. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
13. PO Justin P. Forrest, 1125 Locust, Kansas City, MO 64106
14. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO
15. PO Edwin Gordillo, 1125 Locust, Kansas City, MO 64106
16. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
17. PO Richard L. Hart, 1125 Locust, Kansas City, MO 64106
18. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
19. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
20. DET Michael B. Luster, 1125 Locust, Kansas City, MO 64106
21. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
22. [REDACTED]
23. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
24. PO Daniel Quiles, 1125 Locust, Kansas City, MO 64106
25. PO Vincent Reyes, 1125 Locust, Kansas City, MO 64106

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26. PO Jasmine Ruchman, 1125 Locust, Kansas City, MO 64106
27. PO Kenneth G. Secaida, 1125 Locust, Kansas City, MO 64106
28. CST Benjamin Simmons, 2645 Brooklyn Ave., Kansas City, MO 64127
29. DET Brent R. Taney, 1125 Locust, Kansas City, MO 64106
30. DET Brian Tomanio, 1125 Locust, Kansas City, MO 64106
31. CST Greg VanRyn, 2645 Brooklyn Ave., Kansas City, MO 64127
32. 
33. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106
34. PO Nikole Ziller, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 12-04-2018

CRN: 18-092111

I, Det. Tom Hammond #4775  
(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 11-29-2018, at 2620 Van Brunt Blvd #2 in  
(Date) (Address)

Kansas City, Jackson Missouri Anthony O. Eskridge  
(County) (Name of Offender(s))

B/M 12-08-1994 committed one or more criminal offense(s).  
(Description of Identity)

- Murder
- Robbery
- Aggravated Assault
- Armed Criminal Action

The facts supporting this belief are as follows:

On 11-29-2018 at 2006 hours, Officers from the Kansas City Missouri Police Department were dispatched to 2620 Van Brunt Blvd in regard to a shooting. Upon arrival Officers responded to apartment #2 where they located blood outside of the apartment and evidence of a shooting inside the apartment. Two living victims were located upstairs in apartment #6. Both living victims were transported to an area hospital. Two witnesses who were present during the shooting responded to Police Headquarters to provide statements.

While on scene Officers were notified an unknown black male shooting victim was dropped off at the VA Hospital. The unknown black male victim was transferred to another area hospital where he later died as a result of his injuries.

Witness #1 stated she, the male living victim, and their six month old child were at 2620 Van Brunt Blvd #2 hanging out with the female living victim and witness #2. Witness #1 stated the female living victim was texting someone named "Anthony" about coming over. Witness #1 stated "Anthony" and another black male (later identified as the deceased black male) had been at the same apartment hanging out with everyone a few days prior. Witness #1 stated "Anthony" and the deceased male arrived at the apartment with a third unknown black male. Witness #1 stated when the apartment door opened she saw "Anthony" and the deceased male armed with guns and they started shooting. Witness #1 stated the male living victim did have a gun but she was not sure if he shot back or not. Witness #1 stated the third male with "Anthony" and the deceased male was armed but she did not see if he shot his gun. Witness #1 was shown a photo line-up with **Anthony O. Eskridge B/M 12-08-1994** in the line-up and she positively identified him as the "Anthony" she had been referring to.

Witness #2 stated the same people were at the apartment as stated by Witness #1. Witness #2 stated the female living victim asked "Anthony" to come over. Witness #2 stated she opened the door for "Anthony" when he arrived at the apartment with several other black males. Witness #2 stated "Anthony" walked toward the male living victim and said something like, "Yo, run that heat". Witness #2 stated "Anthony" pulled out a gun and started shooting. Witness #2 stated she got on the ground and covered her head. Witness #2 stated the male

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living victim may have had his gun and may have shot back, but she was not sure. After the shooting a couple unknown black males took a gun she believed was the male living victim’s gun. Witness #2 was shown a photo line-up with **Eskridge** in it and she positively identified **Eskridge** as the “Anthony” she had been referring to.

The female living victim stated the same people were at the apartment as stated by both witnesses. The female living victim stated the day before the shooting, **Eskridge** and the deceased male were at her apartment hanging out with all the same people who were there when the shooting happened. The female living victim stated the male living victim and the deceased male had “beef” because the deceased male was present when a friend of the male living victim was killed in the past. The male living victim believed the deceased male was friends with or knew the suspect who killed his friend. The female living victim stated the day before the shooting, **Eskridge** and the deceased male were talking to the male living victim about his gun and admiring it. The female living victim stated the next day just after **Eskridge** and the deceased male arrived at her apartment, **Eskridge** went to shake the male living victim’s hand, but then pulled out a gun and told him give up his gun. She then saw **Eskridge** shoot his gun as she turned her head away. The female living victim stated she was not sure who all had guns or who shot, but stated **Eskridge** fired the first shot and was trying to get the male living victim’s gun. The female living victim also picked **Eskridge** out of a photo line-up.

The phone number the female living victim provided as the number for **Eskridge** was checked in the KCPD CAD system for prior entry. The number came back as having previously called with the contact name of “Anthony” in the call. The KCPD report generated in regard to the phone call was checked and **Eskridge** was the only “Anthony” listed in the report.

The female living victim suffered a gunshot wound to her right hand and was transported to a local hospital for treatment. The male living victim suffered from several gunshots and was transported to a local hospital where he was listed in critical condition.

On 12-03-2018 at 1330 hours, **Eskridge** was arrested and transported to Police Headquarters. After being read his Miranda Rights, **Eskridge** declined to provide a statement.

Printed Name Det. Tom Hammond #4775 Signature /s/Det. Tom Hammond #4775

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.