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

POLIC	E <b>NO.</b> :	17-0919	27
PROSECUTO	R NO.:	0954449	974
	OCN:		
STATE OF MISSOURI,	PLAIN	TIFF,	) )
vs.			
ANTHONY L. ROBINSON 3806 E. 69th St. Kansas City, MO 64130 DOB: 08/28/1991 Race/Sex: B/M	DEFENI	DANT.	) ) ) CASE NO. 1916-CR ) DIVISION ) )

# **COMPLAINT**

Count I. Murder 2<sup>nd</sup> 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 October 26, 2017, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Harlon Dunbar caused the death of Harlon Dunbar by shooting him.

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 (571.015-001Y19755213.0)

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 October 26, 2017, in the County of Jackson, State of Missouri, the defendant 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. 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/ 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. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
- 2. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
- 3. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
- 4. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106

5.

6. DET Brent R. Taney, 1125 Locust, Kansas City, MO 64106

# State vs. Anthony L. Robinson

- 7. DET Stacey F. Taylor, 1125 Locust, Kansas City, MO 64106
- 8. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

9.

## PROBABLE CAUSE STATEMENT FORM

CRN: 17-091927

		11 03 13 27
I, MDet. Brent Taney #4641		
(Name and identify law enforcement officer	, or person having information as pr	obable cause.)
knowing that false statements on this for	m are punishable by law, state	that the facts contained herein are true.
I have probable cause to believe that on	10/26/2017 , at <u>7</u> (Date)	rth Street and Norton Avenue in (Address)
Kansas City, Jackson County (County)	Missouri Anthony L. Robin	nson (Name of Offender(s))
B/M, 08/28/1991  (Description of Identity Murder 2 <sup>nd</sup> degree/ ACA	comm	mitted one or more criminal offense(s).

The facts supporting this belief are as follows:

Date: 04/11/2018

On 10/26/2017 at 1421 hours, Officers of the Kansas City Missouri Police Department were dispatched to 7th Street and Norton Avenue, Kansas City Jackson County Missouri in regard to shots fired, party down call. Upon arrival, Officers located the victim lying in the road injured from an apparent gunshot wound. The victim was declared deceased at the scene by EMS personnel.

Witnesses stated a black male with a gray hooded sweatshirt and blue jeans, shot the victim and entered a maroon minivan, parked on the north side of 7th Street. A witness stated the suspect entered the front passenger seat of the maroon minivan she was driving, pointed the gun at her and told her to drive to 37th Street and Bales. The witness called 911 and informed the call taker she witnessed the homicide and was directed to drive the suspect to 37th and Bales. The witness described the suspect as a black male with the moniker, "AR", and stated he had a tattoo with an unknown word starting with the letter "A" above his left eye. The witness agreed to meet with detectives at 27th Street and Vine where she parked the minivan used to transport the suspect from the scene to 37th and Bales.

Anthony L. Robinson, B/M, 08/28/1991 was developed as a possible suspect from physical descriptions provided by the witnesses compared to an investigative report from a prior separate incident. A photo line-up of Robinson was compiled in regard to the homicide investigation. Witnesses from the scene identified Robinson from a photo line-up as the suspect who shot the victim.

A stop order was issued for **Robinson** in regard to the homicide investigation. On 04/11/2018, **Robinson** was arrested and transported to East Patrol Division. Prior to any questioning, **Robinson** was advised of his Miranda Rights, stated he understood his rights and signed the Miranda Waiver. **Robinson** was questioned in regard to the homicide, stated he was not at the scene of the homicide and did not shoot the victim. **Robinson** was informed he had been identified as the shooter from witnesses at the scene and continued to deny his involvement. After further questioning about the homicide, **Robinson** stated he did not want to talk any further and requested to go back to his cell.

#### PROBABLE CAUSE STATEMENT FORM

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Printed Name	MDet. Brent Taney #4641	Signature MOCT-/ 1 AM & THEY
The Court finds	s probable cause and directs the issuance	of a warrant this day of
	Jud	ge
	Circuit Court of	County, State of Missouri.