

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	19-000697
PROSECUTOR NO. :	095451472
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

CLIFTON L. JACK

1404 NE Ivory Lane

Lees Summit, MO 64086

DOB: 07/07/1973

Race/Sex: B/M

DEFENDANT.)

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840901.0)

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 March 12, 2019, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Rita F. Moore by shooting her.

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.

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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 March 12, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count 1, 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. 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 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 March 12, 2019, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Rodney W. Brundige 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 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 March 12, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count

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3, 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. . 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/ Hallie L. Williams
Hallie L. Williams (#66333)
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WITNESSES:

1. Rodney W Brundige, 11713 E 83rd St., Apt 101, Kansas City, MO 64138
2. PO John Gilligan, 10000 E. 59th Street, Raytown, MO 64133
3. PO Evan Hartenstein, 10000 E. 59th Street, Raytown, MO 64133
4. SGT Aaron Hixon, 10000 E. 59th Street, Raytown, MO 64133
5. Marvin Hokins, 11713 E 83rd St., Apt 101, Kansas City, MO 64138
6. PO Brandon Meyer, 10000 E. 59th St., Raytown, MO 64133
7. Rita Faye Moore, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

Probable Cause Statement Form

Date: 3/12/2019

Report: 19-000697

I, Erica Hopper, 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 3/12/2019, at 11713 E. 83rd Street, Raytown, Missouri 64138, Clifton L. Jack, a black male born 7/7/1973, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 3/11/2019 at 1911 hours, Raytown Police Officers were dispatched to 11713 E. 83rd Street, apartment #101, Raytown, Missouri 64138 regarding a disturbance. Upon arrival, Raytown Officers contacted the calling party, Rita F. Moore, a black female born 4-8-1974. Rita Moore advised her ex-boyfriend, Clifton L. Jack, a black male born 7-7-1973 had arrived at her residence, causing a disturbance. Clifton L. Jack left prior to officer's arrival. Patrol Sergeant Gary Davis made contact with Clifton L. Jack on the phone. Clifton L. Jack stated he wanted his money back that Rita Moore "owed" him. Clifton L. Jack also stated "I'm not afraid of going to jail" while on the phone with Sergeant Davis. Rita Moore described the ongoing harassment she has received from Clifton Jack since they broke up in September of 2018. Sergeant Davis and Corporal Greer advised Rita Moore of the steps to obtain an ex-parte, which she advised she would obtain after work on 3/12/2019.

On 3/12/2019 at 0559 hours, Raytown Police Dispatch received a 911 call from Marvin J. Hopkins, a black male, born 08-06-2000. Marvin J. Hopkins advised his step-dad, identified as Clifton L. Jack, shot his mom and his mom's boyfriend. Marvin J. Hopkins identified his mother as Rita F. Moore a black female, born 4-8-1974 and Rita Moore's boyfriend as Rodney W. Brundige, a white male born 2-13-1970. Marvin J. Hopkins then advised Clifton L. Jack shot himself.

Raytown Police Officers responded to 11713 E. 83rd Street, Apartment #101, Raytown, Missouri 64138. Upon arrival, Sergeant Jared Rogers and Corporal Thomas Greer made contact with Marvin J. Hopkins in the common hallway of the apartment building. Marvin J. Hopkins advised the responding officers that the individuals were shot and located in the back bedroom. Sergeant Rogers and Corporal Greer entered the residence to conduct a safety sweep and render medical aid. Two (2) deceased parties were located lying on the bedroom floor of the northeast bedroom with apparent gunshot wounds.

Located next to Rita Moore on the floor, was Clifton L. Jack, whom was still responsive and aid was rendered by Reserve Officer John Gilligan and Officer Brandon Meyer. Reserve

Officer Gilligan asked Clifton L. Jack who shot him and he advised he had shot himself. Clifton Jack had an apparent gunshot wound below his left nipple.

Upon my arrival, I entered the apartment to assist responding officers. At that time, Raytown Fire Department also arrived on scene and transported Clifton L. Jack to Centerpoint Medical Center via ambulance. Rodney Brundige was located lying on his left side on the floor between the foot of the bed and the dresser with an apparent gunshot wound. An apparent gunshot wound was observed to the right side of his back. Rita Moore was located on the floor between the west side of the bed and the closet. She was partially in the closet and had an apparent gunshot wound to her right forearm. A spent shell casing and a rifle was observed lying in the hallway just outside the bedroom.

A search warrant was obtained from the Jackson County Prosecutor's Office and the Missouri State Highway Patrol assisted with processing the crime scene. A Remington 700 bolt-action rifle bearing S#B6346575 was located in the hallway of the apartment. Two (2) spent shell casings were also located in the apartment. One (1) spent shell casing was located in the rifle chamber upon clearing and rendering safe for recovery. One (1) live round was located in the internal magazine of the rifle.

During the initial investigation, it was learned from officers who responded to the residence the first time that Clifton Jack drives a red 1999 Chevy C4E pickup truck with "Marine" stickers on the back window. A search of the apartment complex and immediate area surrounding the complex was conducted. The truck, bearing Missouri license plate 2DU-411 and VIN# 1GCEK19T3XE193566 was located in the parking lot of Prodigy Plumbing and Mechanical, located at 8402 Westridge Road, Raytown, Missouri 64138. The parking lot where the truck was parked is 0.3 miles from the apartment address utilizing city roadways. Surveillance video from Prodigy Plumbing and Mechanical was obtained. The video shows the truck entering the parking lot and parking. An unidentified individual exits the driver's seat of the truck and walks toward the wooded area between the parking lot and Woodson Court, which is directly south of the apartment complex.

An interview with Marvin Hopkins was conducted in a recorded interview room at 0739 hours. Marvin Hopkins advised he was asleep in his bed at the aforementioned address when he heard a noise like glass breaking. Marvin Hopkins then advised he heard one (1) gunshot. Marvin Hopkins advised he opened his bedroom door (southeast bedroom) and observed Clifton Jack standing in the hallway with a brown rifle. Marvin said he could see Rodney Brundige lying on the bedroom floor with an apparent gunshot wound to his abdomen. Marvin Hopkins said he saw Clifton Jack shoot Rodney, resulting in a gunshot wound to the right side of his back. At that time, Marvin Hopkins said he grabbed Clifton Jack, whom he referred to as "step-pops", by the front of his shirt and said "What are you doing?" Marvin Hopkins said Clifton Jack said something to the effect of "I now have to shoot myself". Marvin Hopkins said he backed up toward the kitchen area as Clifton Jack put the barrel end of the rifle to his chest, outstretched his

arms and pulled the trigger. Marvin Hopkins said Clifton Jack dropped the rifle in the hallway and fell to the ground. Marvin Hopkins advised he went into his mom's bedroom (northeast) and grabbed her phone off the bed. He stated he sat on her bed and tried to get in to her phone but was unable to. Marvin said at that time, he set the phone back down on the bed and went to his bedroom to get his phone and called 911. Marvin stated after he was on the phone with 911, Clifton Jack "army-crawled" from the hallway back into the bedroom. Marvin Hopkins did not see where in the bedroom he crawled to because he was advised by dispatch to go outside with his hands up.

Marvin Hopkins said he received a phone call from Clifton Jack on 3/11/2019 while at track practice at school (Raytown South High School). Marvin Hopkins said Clifton Jack gave him a ride home from practice. Once home, Marvin Hopkins said his mom ordered pizza for dinner and approximately 20-30 minutes later around 6:00 P.M., there was a knock at the door. Marvin Hopkins stated as the door was opened, Clifton Jack forced his way in and shut the apartment door. Marvin Hopkins said he grabbed Clifton Jack by the shirt and pushed him against the apartment door. He advised he told Clifton Jack he needed to leave and escorted him outside. He advised Clifton Jack Marvin Hopkins said he received a text from Clifton Jack after the disturbance at 7:35 P.M. that read "I love you but know is my time for payback for everything that was done to me" and "Tell your mom I need my money back asap I don't care who pays it. But this time I'm done playing games". A minute later at 7:36 P.M., Marvin received a phone call from Clifton Jack. Marvin advised Clifton told him he loved him and that he would never do anything to hurt his family. When asked if there had been threats made towards Rita Moore in the past, Marvin Hopkins stated there was one (1) instance a "long time ago". Marvin Hopkins said while they lived in a different house in Raytown, Clifton Jack put a gun to Rita Moore's head, but didn't shoot her.

Investigations Sergeant Aaron Hixon interviewed Marvin Hopkins's sister, Asiaunna Hopkins. Asiaunna Hopkins stated she received a text message on her cellphone from Clifton Jack on 3/11/2019 at 7:55 P.M. that read "Tell your mom and him I coming for them". Asiaunna Hopkins advised her mom, Rita Moore, got a new phone on Sunday 3/10/2019 to include a new phone number that Clifton Jack was not aware of. Asiaunna described the old phone as a purple LG3, which contains threatening messages. Asiaunna Hopkins mentioned her awareness of Clifton Jack threatening Rita and going to her residence ever since he got out of jail.

Name: Det. E. Hopper #1680

Signature: /s/ Det. E. Hopper #1680