

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

<b>POLICE NO. :</b>	19-023510
<b>PROSECUTOR NO. :</b>	095451962
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>BRYANT E. ROBINSON</b>	)	
<b>5206 Wabash</b>	)	<b>CASE NO. 1916-CR</b>
<b>Kansas City, MO 64130</b>	)	<b>DIVISION</b>
<b>DOB: 11/25/1994</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Accessory Murder 2nd Degree (565.021-001Y19840911.2)**

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 1, 2019, in the County of Jackson, State of Missouri, the defendant, acting alone or in purposeful concert with others, knowingly or with the purpose of causing serious physical injury to Michael A. Garrett caused the death of Michael A. Garrett by shooting him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served. 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. Accessory Armed Criminal Action (571.015-001Y19755213.2)**

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 1, 2019, in the County of Jackson, State of Missouri, the defendant 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, acting alone or in purposeful concert with another, committed the foregoing felony

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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. Accessory Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y19841304.2)**

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 April 1, 2019, in the County of Jackson, State of Missouri, the defendant, acting alone or in purposeful concert with another, knowingly caused serious physical injury to [REDACTED] by shooting her.

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. 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 IV. Accessory Armed Criminal Action (571.015-001Y19755213.2)**

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 1, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant, acting alone or in purposeful concert with another, 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. 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.

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/ Lauren Whiston*  
Lauren Whiston (#66185)  
Assistant Prosecuting Attorney  
415 E. 12th St., 11th Fl  
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**WITNESSES:**

1. SGT John N. Blomquist, 1125 Locust, Kansas City, MO 64106
2. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
4. Michael A. Garrett, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. [REDACTED] 11, Kansas City, MO 64106
6. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
7. PO Samantha M. Parkhurst, 1125 Locust, Kansas City, MO 64106
8. DET John W. Straubel, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 04-04-2019

CRN: 19-023510

I, Det. Scott Emery #4161  
(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 04-01-2019, at 63<sup>rd</sup> and Manchester in  
(Date) (Address)

Kansas City, JACKSON Missouri Bryant E. Robinson  
(County) (Name of Offender(s))

B/M 11-25-1994, 5'11" tall 130 pounds, black hair and brown eyes committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 04-01-2019 at 1312 hours, Officers from the Kansas City Missouri Police Department were dispatched to 63rd/Manchester in regard to a shooting. Upon arrival two victims were located inside a Gray 2012 Ford Fusion bearing Missouri license plate EB3V5G. The male passenger (identified as Michael Garrett B/M 04-29-1978) of the vehicle was deceased from apparent gunshot injuries and the female driver suffering from apparent gunshot injuries was transported to a local hospital.

A witness was contacted at the scene who advised he observed the previously mentioned Ford Fusion eastbound on 63rd St and a silver/gray Dodge Ram 1500 crew cab pick-up also eastbound on 63rd St next to the Ford Fusion on the passenger side. The witness observed the light wooden foregrip of a SKS rifle sticking out of the rear driver's window of the Dodge pick-up. The witness stated he could see the skin color of the hand holding the rifle was black. The witness stated he saw the rifle fired numerous times into the passenger side of the Ford Fusion. The Dodge pick-up fled south on Manchester from the scene.

Surveillance video in the area near the homicide showed the Ford Fusion being followed by a silver/gray Dodge Ram pick-up truck with a wheel chair in the bed of the pick-up. The license plate on the Dodge Ram was identified as Ohio plate PJZ3111, which responded back to EAN Holdings, Enterprise Rental.

Representatives from EAN Holdings were contacted who advised as of 04-01-2019 at 1300 hours the Dodge Ram pick-up had been rented by Bryant Robinson B/M 11-25-1994. They also advised the truck was returned to the Enterprise Rental Center at 9400 Troost Ave, Kansas City, Missouri on 04-01-2019 at 1350 hours.

A computer check of Bryant Robinson revealed he was the victim of an Agg Assault in 2013 (KCPD CRN 13-059696). The injuries sustained by Robinson in the shooting left him paralyzed from the chest down and wheel chair bound. Michael Garrett B/M 04-29-1978 was developed as the suspect in the shooting, but due to lack of cooperation from Robinson the case was inactivated.

On 04-04-2019 at 1530 hours, Bryant E. Robinson, accoppanied by his attorney responded to Police Headquarters and was advised of his Miranda rights, he invoked his right to remain silent.

**PROBABLE CAUSE STATEMENT FORM**

CRN 19-023510

Printed Name Det. Scott Emery #4161 Signature Det. Scott Emery #4161

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

\_\_\_\_\_  
Judge

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