

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	19-018593
PROSECUTOR NO. :	095452177
OCN:	

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 BRYANT A. BROWN)
 6819 Walrond Ave.) CASE NO. 1916-CR
 Kansas City, MO 64132) DIVISION
 DOB: 05/24/2000)
 Race/Sex: B/M)
)
)
)
 DEFENDANT.)

COMPLAINT

Count I. Murder 2nd 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 March 14, 2019, in the County of Jackson, State of Missouri, the defendant knowingly, or with the purpose of causing serious physical injury to Deron C Ross), caused the death of Deron C Ross 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. 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 March 14, 2019, in the County of Jackson, State of Missouri, the defendant

State vs. Bryant A. Brown

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. 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/ Jennifer S Tatum

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WITNESSES:

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106

State vs. Bryant A. Brown

2. DET Duston L. Burnett,
3. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
4. PO John F. DiSalvo, 1125 Locust, Kansas City, MO 64106
5. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
6. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
7. DET Patrick J. McKenzie, 1125 Locust, Kansas City, MO 64106
8. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
9. DET Kimberlee Jo Rice, 1125 Locust, Kansas City, MO 64106
10. Deron C Ross, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
11. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
12. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04-17-2019

CRN: 19-18593

I, Detective Tim Fitzgerald #5492 of the Kansas City Missouri Police Department
(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 03-14-2019, at 5357 Swope Parkway in
(Date) (Address)

Kansas City, Jackson County Missouri Bryant A. Brown
(County) (Name of Offender(s))

R/S: B/M DOB: 05-24-200 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 03-14-2019 at 0010 hours Officers of the Kansas City Missouri Police Department were dispatched to **5357 Swope Parkway, Kansas City, Jackson County, Missouri** on a reported sound of shots. Upon arrival they located the victim lying face down in the southbound lanes of Swope Parkway. He was suffering from multiple apparent gunshot wounds. Emergency Medical Services responded to the scene and transported the victim to Research Medical Center where he died as a result of his injuries. The victim was transported to the Jackson County Medical Examiner's Office where his death was ruled a homicide.

A witness was interviewed and he stated he was driving his maroon Buick Rendezvous in the area of 53 Street and Swope Parkway when his vehicle broke down. His twin brother, the victim, was in the vehicle with him. He and the victim got out of the vehicle and began trying to fix the vehicle. At that time, the suspect approached them on foot from the south. The suspect was a light skinned black male, average height, skinny, approximately 19 years old, and was wearing red shoes, blue jeans, and a red sweatshirt. The suspect told him and the victim that they were being too loud. The suspect then became aggressive towards him and the victim. At that time, he went back to the vehicle to attempt to start the vehicle. The victim and the suspect were still outside and became involved in a verbal argument. He got back out of the vehicle to break up the victim and the suspect and the suspect hit him in the mouth with an unknown object which he believes could have been a gun. He heard approximately 5 gunshots and saw the victim lying on the ground. The suspect ran south and he ran after the suspect, but then decided to go back and check on the victim. The witness stated he did not have a gun and neither did the victim. The witness sustained a cut to his upper lip that appeared consistent with being struck.

Another witness was interviewed who stated she was with the victim and his brother when their vehicle broke down. As the brothers were attempting to fix the vehicle, she observed the suspect walk towards them. The suspect began yelling at them for being too loud. The suspect had a pistol in his front jeans pocket. The suspect hit the victim's brother with an unknown object. The victim started yelling at the suspect for hitting his brother. She heard 4 or 5 gunshots and observed the victim lying on the ground and the suspect running away.

PROBABLE CAUSE STATEMENT FORM

CRN 19-18593

An investigation of the crime scene revealed maroon Buick Rendezvous parked in the southbound lanes of Swope Parkway just south of 53 Street. A red baseball cap with "KC" written in white writing on the front was lying on the street between the vehicle and the curb of the street. It was determined this hat was likely left by the suspect. Six .40 caliber shell casings were lying in the street. A gun was not found at the crime scene.

Video surveillance from the Country View Market located at 5802 Swope Parkway was obtained for the night of 03-13-2019. The video surveillance showed two unknown black males inside the store. One of the black males was wearing a black stocking cap and a black and red coat. The other black male was wearing a red baseball cap with "KC" written in white writing on the front and a red shirt with writing on the left breast. The red baseball cap with "KC" written in white writing appeared to be the same hat that was recovered from the crime scene. The males exited the store and left in a vehicle at 2348 hours. Still shots of from the video surveillance were taken and subsequently released to the media.

On 03-15-2019 an individual responded to the Center Patrol Division police station and spoke with a police officer. At that time, the individual stated "I saw my picture on the news because of some murder that happened on 53 St."

On 03-16-2019 I contacted that individual who identified himself as the black male wearing a black stocking cap and a black and red coat. He identified the black male wearing a red baseball cap with "KC" written in white writing on the front and a red shirt as his little cousin "Pookie". He stated that on 03-13-2019 at approximately 2330 hours he took "Pookie" from his mother's duplex in the area of 55 Street and Swope Parkway to the Country View Market. After buying some items inside the store, he dropped "Pookie" back off at his mother's duplex and went home.

An investigation of "Pookie" and the information about "Pookie" provided by that individual revealed **Bryant A. Brown B/M 05-24-2000**. A Missouri DOR photograph of **Brown** was obtained and he matched the identifiers of the suspect provided by the witnesses and resembled the other individual in the Country View Market video surveillance.

On 04-04-2019 the Missouri DOR photograph of **Brown** was shown to a family member of **Brown**. That family member identified the photograph of **Brown** as "Pookie".

On 04-09-2019 I received a tip that stated "Bryant Brown" is responsible for the homicide and that he has fled to Columbia, Missouri since the homicide.

On 04-16-2019 Detectives from the Columbia Missouri Police Department were conducting surveillance on **Brown**'s father's residence. At that time, they observed **Brown** exit the residence and attempted to take him into custody. However, **Brown** fled from officers on foot but was apprehended a short time later. **Brown** was arrested and subsequently transported to the Jackson County Jail in Kansas City, Missouri.

On 04-17-2019 **Brown** was transported to Police Headquarters where he agreed to speak with Detectives. **Brown** initially stated he did not know why he was arrested and went to Columbia just to get away from Kansas

PROBABLE CAUSE STATEMENT FORM

CRN 19-18593

City. He then stated he saw his photograph on the news in regard to a shooting. I showed **Brown** the still shots from the Country View Market surveillance and he confirmed he was the individual in the still shot wearing the red baseball cap with "KC" written in white writing on the front and a red shirt. On that night, he went to that store where he met his cousin. His cousin drove him from the store to his friend's house off of 49 Street. His friend was not home so he started walking on Swope Parkway where he saw two males in an argument by a vehicle parked on Swope Parkway. The males started yelling at him so he ran away. As he was running away, he heard gunshots and thought they were shooting at him. He later saw on the news that the shooting resulted in a homicide. He took a bus to Columbia because he was scared the police would think he had something to do with the homicide. When confronted with evidence and statements that contradicted his story, **Brown** changed his story and stated he punched one of the males because they had him surrounded. Both males began beating him and were on top of him. One of the males pulled out a gun. He knocked the gun out of the male's hand, retrieved the gun, and shot the male four or five times. He left the gun at the scene and ran away. I attempted to ask **Brown** follow up questions in order to gain additional details about the incident but **Brown** requested a lawyer.

Printed Name Detective Tim Fitzgerald #5492 Signature /S/ Detective Tim Fitzgerald #5492

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

Judge

Circuit Court of _____ County, State of Missouri.