


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	19-003692
PROSECUTOR NO. :	095453491
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DANA C. JONES)	
13001 S. Harris Rd.)	CASE NO. 1916-CR
Greenwood, MO 64034)	DIVISION
DOB: 01/16/1975)	
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 June 26, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Kimberly Renee Alcorn caused the death of Kimberly Renee Alcorn by shooting her.

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 (571.015-001Y19755299.0)

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 571.015.2, RSMo, in that on or about June 26, 2019, in the County of Jackson, State of

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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 committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

On or about November 26, 2003, in Jackson County Circuit Court, the defendant was convicted of the offense of armed criminal action.

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.

Count III. Assault 1st Degree Or Attempt (565.050-002Y19791304.0)

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 June 26, 2019, in the County of Jackson, State of Missouri, the defendant shot at [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.

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 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.

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 571.015.2, RSMo, in that on or about June 26, 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 committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

On or about November 26, 2003, in Jackson County Circuit Court, the defendant was convicted of the offense of armed criminal action.

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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 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/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

1. Kimberly Renee Alcorn, 13001 S Harris Rd, Greenwood, MO 64034
2. DET Richard A. Berger, 3310 NE Rennau Drive, Lees Summit, MO 64064
3. DEP Brock Billings, 313 Black Jack Ave, Lone Jack, MO 64070
4. DEP Joshua Cox, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
5. DEP Mark Curd, 3310 NE Rennau Drive, Lees Summit, MO 64064
6. [REDACTED]
7. DET Chase Hager, 3310 NE Rennau, Lees Summit, MO 64064
8. [REDACTED]
9. [REDACTED] 64064-1703
10. [REDACTED]
- [REDACTED] 64064

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I, Detective Chase C. Hager #34/0377, of the Jackson County, Missouri Sheriff's Office, knowing that false statements on this form are punishable by law, state that the facts contained herein are true:

1. I have probable cause to believe that between June 26, 2019, at 13001 South Harris Road, Greenwood, Missouri, which is inside the boundaries of Jackson County, Missouri, Dana C. Jones, B/M, January 16, 1975, [REDACTED], last known address: 13001 South Harris Road, Greenwood, MO, committed one or more criminal offense(s).
2. The facts supporting this belief are as follows:

On June 26, 2019, at approximately 2256 hours, Jackson County Sheriff's Office Deputies were dispatched to 13001 South Harris Road, Greenwood, Jackson County, MO in reference to a possible shooting. Deputies arrived and staged in the area of the address. While Deputies were staged, they were notified by Jackson County Dispatch, the suspect was attempting to leave the residence in a white in color car. On scene Deputies observed a white Nissan GTR drive west down the driveway toward Harris Road. Deputy S. Watts, Deputy B. Billings, Deputy G. Marshall, Deputy A. Garcia and Deputy J. Atty attempted to stop the vehicle at the end of the driveway. The driver of the Nissan GTR fled southbound on Harris Road from the address. The aforementioned Deputies pursued the suspect vehicle as it travelled southbound on Harris. The suspect vehicle left the roadway at the intersection of Harris Road and Haines, Greenwood, Jackson County, MO collided with a tree and came to rest. The driver of the vehicle continued to press the accelerator of the vehicle. Due to the collision, the vehicle was not able to move. The driver of the vehicle was taken into custody after failing to comply with the Deputies lawful commands. Subsequent to the driver of the vehicle being taken into custody, he was identified as Dana C. Jones, b/m 01-16-1965. At the time of being placed into custody, Jones was reported to be naked.

Deputy Garcia and Deputy Atty returned to the scene of the possible shooting (13001 South Harris Road). Deputy R. Heck, Deputy Garcia, Deputy Atty and Sergeant Blodgett cleared the residence through the open garage overhead door. Inside the garage, they entered the residence through the open pedestrian door leading into the kitchen. Upon entering the kitchen, Sgt. Blodgett advised he heard a male voice coming from the northeast corner of the residence stating, "I'm back here, she is back here." It was later determined the voice heard by Sgt. Blodgett belonged to [REDACTED] [REDACTED] w/m 01-29-1962. [REDACTED] was given verbal commands to come out to the Deputies, where he was taken into custody. While being detained, [REDACTED] stated, "that's the gun he shot her with. Deputies observed a stainless steel and black polymer handgun on the floor near [REDACTED]. Deputies continued to clear the residence and made it to the furthest most northeast bedroom of the residence. Upon entering the residence, Sgt. Blodgett observed a white and gray pit bull, which had been shot. The pit bull was lying just inside the threshold of the room. Further inside the room, Sgt. Blodgett observed a white female lying on her back on the bed that was located in the northeast corner of the bedroom. Sgt. Blodgett observed a shell casing on the ground,

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just southwest of the bed where the female's body was located. Sgt. Blodgett described the female as being clothed and observed a pillow to be placed over her face. Sgt. Blodgett advised, it was immediately apparent to him that the female victim (later identified as Kimberly Alcorn) was deceased.

Sgt. Blodgett advised, prior to entering the residence, two individuals were discovered outside the residence and later determined to be witnesses. These individuals were identified as [REDACTED] and [REDACTED]. It was determined that [REDACTED] had been inside the residence after the incident occurred. Subsequent investigation revealed there to be two additional individuals inside the residence at the time of the incident. They were identified as [REDACTED] [REDACTED] (Kimberly Alcorn's grandson) and [REDACTED] [REDACTED], the girlfriend of [REDACTED]. [REDACTED], [REDACTED], [REDACTED] and [REDACTED] were all transported to the Jackson County Sheriff's Office for interview statements.

Detective Miller and I, your affiant, obtained a witness statement from [REDACTED]. [REDACTED] stated upon his arrival at the residence he was driving [REDACTED] truck and parked facing the house with the vehicles high beam headlights on. [REDACTED] stated he observed Jones come out of the garage and was gesturing like he had a gun then he, [REDACTED], left and went to the neighbors to call 911. [REDACTED] stated he saw Jones leave the property. I asked [REDACTED] what he did after he saw Jones leave. [REDACTED] stated he went over to the house and entered the house. [REDACTED] stated he went through the kitchen and went towards the room. [REDACTED] stated he saw all of Alcorn's purse or belongings on the floor and he saw the gun on the floor. [REDACTED] stated it looked like the same gun he had seen earlier in the week. [REDACTED] stated he started saying "Kim, Kim" and did not get an answer. [REDACTED] stated he went to Alcorn's bedroom and saw the dog lying on the floor inside the bedroom door. [REDACTED] stated he didn't initially see [REDACTED] but then he saw her. [REDACTED] stated Alcorn had blood on her face and head area and he could tell she was dead. [REDACTED] stated he checked to see if she was alive. [REDACTED] stated he ran to the neighbor's yelling, "help, help". [REDACTED] stated about ¾ of the way there he saw the neighbor come back out of the house and he instructed him to call 911 or an ambulance. [REDACTED] stated he started back toward Alcorn's house when he saw [REDACTED] who had to park out in the road. (It should be noted [REDACTED] is the boyfriend of [REDACTED], Alcorn's daughter.) [REDACTED] told [REDACTED] that he was pretty sure she was dead. [REDACTED] stated he and [REDACTED] went into the bedroom and [REDACTED] told him he needed to get [REDACTED]. [REDACTED] stated he told [REDACTED] he wasn't going to go nowhere. [REDACTED] stated that is when he placed the pillow over Alcorn's face. [REDACTED] stated [REDACTED] left the residence to go get [REDACTED]. [REDACTED] stated he searched the house for a phone to call 911. [REDACTED] stated he found a phone in the office and called 911. [REDACTED] stated shortly after he heard deputies and yelled "I'm here, I'm here". [REDACTED] stated he was directed by the deputies to come to them which he complied and followed their commands.

On 06-27-2019 at 0307 hours, Detective Miller and I conducted witness statement from [REDACTED] W/F 09-25-1999, at GHQ.

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██████████ was asked to explain in detail the events that occurred at the residence of 13001 S. Harris RD in the hour's prior. ██████████ stated she lives at the address with her boyfriend ██████████. She stated the two stay in a basement bedroom just below Alcorn.

██████████ stated when she and ██████████ arrived home about 2200 hours. She said the two went downstairs and began to get ready for bed. A short time later ██████████ stated she and ██████████ began to hear what sounded like a verbal argument between Alcorn and Jones. After a few minutes the two became concerned about Alcorn. ██████████ said ██████████ got their pit bull (Micah) and began walking up the stairs with him. She said she followed them to the top of the stairs where she heard ██████████ yell out something like Hey in an attempt to get Jones's attention. ██████████ stated as they were walking up the stairs she could hear Jones yelling "Fucking Bitch". Once the two reached the top of the stairs she stated ██████████ released the dog and yelled "sick him". Shortly after the dog was released and entered the room ██████████ stated she heard gun shots. She said at that time she and ██████████ began running toward the garage of the residence. ██████████ stated after she realized her dog may have been shot she stopped running and started back to the bedroom.

██████████ stated as she got near the doorway she could see her dog laying lifeless. She stated she peeked her head around into the room and observed Jones standing on the bed with a gun in his hand. She said Jones began to fire the gun at her so she ran back down the stairs to get her keys and later out of the basement exit door. ██████████ stated she called ██████████ after she got to her vehicle to see where he ran to. She said he told her he was up the street on Harris and to come get him. After picking up ██████████ she stated he wanted to go back to the residence because he had no money with him. She said she drove back to the residence and parked at the end of the driveway near the gate with the headlights off. She said ██████████ ran around the residence and into the basement to retrieve his items. A short time later ██████████ stated she could see Jones walk to the opening of the garage. She said he had no shirt on at that time and appeared to have seen her at the end of the driveway. She said Jones turned and began to run back into the residence. At this time ██████████ stated she called ██████████ and told him to get out of the house.

After ██████████ got out of the residence for the second time ██████████ stated the two of them drove to the intersection on MO 7 Hwy and Herring Rd. She stated they contacted Mr. ██████████ at his camper trailer and advised him of the situation. She said ██████████ took her vehicle back to the scene to check on Alcorn.

On June 27, 2019 at approximately 0347 hours, Detective Miller and I obtained a witness statement from ██████████. ██████████ stated he lives in the basement of 13001 South Harris Road with his girlfriend, ██████████ ██████████.

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████████ stated at approximately 2200 hours he arrived at the residence. He stated upon his arrival he and his girlfriend, ██████████, went to the down stairs bedroom where they both reside and began to relax. ██████████ stated while he was in the basement, Jones came down stairs and they had a conversation that last 5 to 7 minutes before Jones went back upstairs. He stated a short time later he began to hear his grandmother Kimberly and her boyfriend Dana Jones verbally arguing. He stated he couldn't really hear what was being said but did hear Dana yell "Bitch I'll kill you". At this time ██████████ stated he and ██████████ began to be worried about Alcorn's well-being. He said they got their pit bull, Micah, and walked up the stairs toward Alcorn's bedroom. ██████████ stated when he reached the top of the stairs he yelled, "hey, what's going on". He stated he didn't get an answer at that time. He stated he released his dog and instructed it to "sick him". Immediately after the dog entered the room with Alcorn and Jones, ██████████ heard an unknown number of gun shots. He said when the shots began to be fired he ran into the kitchen area of the residence and then ran out the open garage door. He stated the event happened so fast and that he was scared so he just ran up Harris Rd.

████████ stated a short time after he ran from the residence ██████████ called him on the phone. ██████████ stated she was now also outside of the residence and wanted to know where to pick him up. After being picked up ██████████ stated he asked ██████████ to take him back to the residence. He stated the two pulled into the driveway with the headlights turned off on the vehicle. He said he exited the vehicle and ran around the north side of the residence to the back door. He said he entered the residence and retrieved his "weed". He stated he exited the residence and returned to the vehicle. He then asked ██████████ to drive to the intersection of MO 7Hwy and Herring RD to contact ██████████. ██████████ stated he contacted ██████████ at the front door of the trailer house and told him a shooting occurred at his residence. He stated ██████████ got into the vehicle and drove to Alcorn's address on Harris Road.

████████ stated he attempted to call 911 at one point. He said he disconnected the call prior to the call being completed.

Detective Berger applied for and was granted a State of Missouri Search Warrant for 13001 South Harris Road. After the Search Warrant was obtained and I had completed my interviews, I returned to the residence and conducted a walk-through of the interior of the house. I observed a semi-automatic handgun to be lying on the floor at the top of the stairs leading to the basement. I went to the bedroom where Alcorn's body was located. I observed there to be a large puddle of blood on the floor where Micah (the pit bull) had been located. I observed Alcorn to be positioned on the bed with her head towards the north wall and her feet facing away. Next to Alcorn's head, I observed the remains of a small white dog that appeared to have succumbed to injuries sustained from a gunshot wound.

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On June 28, I attempted to interview Jones reference this incident. Jones invoked his right to council and the interview was concluded.

On June 28, 2019, I contacted SPCA to confirm the status of Micah, [REDACTED] pit bull. I was advised Micah was euthanized due to sustain three, through and through, gunshot wounds that he was not going to be able to overcome.

On June 28, 2019, at approximately 1555 hours, I received the Investigative Report from the Jackson County Medical Examiner's Office. The Report indicates, Alcorn's manner of death was homicide and the immediate cause of death being multiple gunshot and stab wounds.

/S/ Detective C. Hager #34/0377

Detective Chase C. Hager #34/0377
Jackson County, MO Sheriff's Office