


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

POLICE NO. :	19-006950
PROSECUTOR NO. :	095452187
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
ANGEL G. PEREA)	
5630 E 11th St.)	CASE NO. 1916-CR
Kansas City, MO 64127)	DIVISION
DOB: 07/10/2002)	
Race/Sex: W/M)	
)	
	DEFENDANT.)

COMPLAINT

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

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 January 26, 2019, in the County of Jackson, State of Missouri, F.P. DOB 12/6/2001, was killed by being shot as a result of the perpetration of the class A felony of robbery in the first degree under Section 570.023, RSMo committed by the defendant, alone or in concert with another or others, on or about January 26, 2019, in the County of Jackson, State of Missouri.

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.

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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 January 26, 2019, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of murder in the second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant, alone or in concert with another, 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.

Count III. Robbery - 1st Degree (570.023-001Y20171204.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about January 26, 2019, in the County of Jackson, State of Missouri, the defendant forcibly stole a handgun in the possession of [REDACTED] DOB 12/6/2001, and in the course thereof defendant and, another participant in the offense was armed with a deadly weapon.

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.

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Count IV. 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 January 26, 2019, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of robbery in the first degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant, alone or in concert with another, committed the foregoing felony of robbery 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. 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 V. Assault - 2nd Degree (565.052-001Y20171304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 26, 2019, in the County of Jackson, State of Missouri, the defendant, alone or in concert with another, recklessly caused physical injury to [REDACTED] DOB 5/10/2001 by means of discharge of a firearm.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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Count VI. 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 January 26, 2019, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of assault in the second degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant, alone or in concert with another, committed the foregoing felony of assault 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 VII. Assault - 2nd Degree (565.052-001Y20171304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 26, 2019, in the County of Jackson, State of Missouri, the defendant, alone or in concert with another, recklessly caused physical injury to [REDACTED]. DOB 4/05/2001 by means of discharge of a firearm.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained

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through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count VIII. 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 January 26, 2019, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of assault in the second degree charged in Count VIII, all allegations of which are incorporated herein by reference, and the defendant, alone or in concert with another, committed the foregoing felony of assault 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 IX. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class B Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about January 26, 2019, at 22nd St. and Cypress Ave., in the County of Jackson, State of Missouri, the defendant, alone or in concert with another, knowingly shot a firearm at a motor vehicle, namely a 2003 Honda sedan.

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

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to exceed fifteen (15) years. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

Count X. 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 January 26, 2019, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of assault in the second degree charged in Count VIII, all allegations of which are incorporated herein by reference, and the defendant, alone or in concert with another, committed the foregoing felony of assault 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.

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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/ Jamie K. Hunt
Jamie K. Hunt (#50401)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, MO 64106
(816) 881-4622
jhunt@jacksongov.org

WITNESSES:

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
2. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
3. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
4. [REDACTED]
64106
5. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
6. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
7. [REDACTED]
64106
8. PO Jose Romero, 1125 Locust, Kansas City, MO 64106
9. [REDACTED]
City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07-01-2019

CRN: 19-06950

I, Det. Daniel W. Frazier #5180
(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 01/26/2019, at 2243 hrs in
(Date) (Address)

Kansas City, Jackson Missouri Angel Perea
(County) (Name of Offender(s))

w/m, 07/10/2002 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 01-26-2019 at 2243 hours Officers from the Kansas City Missouri Police Department were dispatched to the Fire Station at 2039 Hardesty, Kansas City, Jackson County, MO on a shooting. Upon arrival they located three victims inside a vehicle suffering from gunshot wounds. One victim was declared deceased at the location and the other two were transported to a local hospital.

The living victims explained to responding officers that the original shooting actually occurred to the south of Ashland Square Park at 22nd St and Cypress Av, Kansas City, Jackson County, Missouri. Officers responded to the area and located several spent shell casings lying on the ground near the base of concrete stairs which led the park.

Two witnesses were located near Ashland Square Park and advised they were parked in a car on Cypress, just to the north of the crime scene. They saw two males dressed in dark clothing walk up the concrete stairs from 22nd st that led to the park. A short time later they observed the victim's vehicle drive into the area and leave. The the victim's vehicle returned with its' headlights off. The victim's vehicle parked on the south side of 22nd St facing eastbound and the witnesses' view of the vehicle was partially blocked by a tree. One of the males came out of the park and approached the vehicle. The second male then walked out of the park and stood behind a tree in front of the car. Around that time the witnesses heard several shots and one of the witnesses observed the party behind the tree fire several shots with a black handgun. The witnesses ducked down into their vehicle and the victim's vehicle fled eastbound. They did not see where the two males fled.

A search of the deceased victim's cellular phone revealed a Facebook messenger conversation. Prior to the homicide the victim was messaging someone with the Facebook name of "Dopefiens Hml". They arranged to meet at Ashland Square Park near the stairs to sell a gun. A picture of the gun was included in the post which was a unique Honor Defense Honor Guard gun with the serial number (0004207) visible in the picture. The gun had bright blue stripes along the slide with the word "Honor Guard" outlined in blue and the front sight colored in the bright blue as well. At 2239 hours, two minutes before the homicide, the victim messaged Dopefiens Hml and told him he was near the stairs. Dopefiens Hml responded that he was on his way followed by the victim telling him he was in the back and to hop in. On 1-27-2019 at approximately 0640

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hours, detectives preserved Dopefiens Hml's account. At approximately 1200 hours detectives discovered the Facebook page for Dopefiens Hml had been taken down.

The living victims were interviewed at the hospital and stated that the deceased victim was selling a gun to an unknown hispanic male. The deceased victim told them to go to Ashland Square Park so that they could meet the person. While waiting in the vehicle an unknown hispanic male got into the back passenger seat, leaving the door open and discussing the gun with the deceased victim. While talking the unknown hispanic male told the victim to give him everything at which point they heard multiple gunshots from the back seat. At the same time they observed an unknown person standing in front of them start shooting. The driver of the vehicle started driving going east bound on 22nd St to Hardesty Av, at which point he turned north to where the fire station was located and got help.

A search warrant was obtained from the Jackson County Courts for the Facebook account of "Dopefiens Hml." While reviewing the data detectives noted that the facebook account had an e-mail of pereaa287@gmail.com registered as well as a phone number of 816-301-0168. The facebook account was initiated on 11-14-2018 at 1246 hrs and deactivated on 01-27-2019 at 1326 hrs. Facebook also noted that the user input they were a male with a date of birth of 01-07-1987. A review of Dopefiens HML's search history showed that he searched for the victim on 01-26-2019 at 1924 hrs via his Facebook app prior to contacting the victim on Facebook. Prior to that conversation a group message was observed which showed DopeFiens HML messaging with four other people talking about the victim and setting him up to do a "lash" (commonly used word for robbery) and to take the victim's gun.

On 3-27-2019 Angel Perea was arrested and transported to the Jackson County Juvenile Detention Center. Detectives interviewed Perea and after waving his rights he stated he did not own a phone at time of the homicide. Perea first stated he had deactivated the "DopeFiens" Facebook account several years earlier. Perea next admitted he had been at a male's house named "Dee". Dee wanted to do a robbery and agreed to pay Perea 250 dollars if he allowed him to use the DopeFiens account to set up the robbery. Dee logged into the account from a phone and set up the robbery on the account. Dee left the residence. Dee came back and told Perea "It went wrong". Dee did not pay him the 250 dollars. Perea then admitted he had rode with Dee to the robbery and they had picked up another suspect along Jackson Avenue. Perea stayed in the back seat of Dee's car while Dee and the other suspect parked on the east side of the park. The suspects walked towards the victims' car and Perea heard shots. The suspects then ran back to the car and both suspects stated they had fired shots. Perea asked the suspects to drop him off at his girlfriend's house. Detectives asked Perea if he had talked to Dee since the incident and Perea stated he had not because Dee still owed him money from the incident.

It should also be noted that Perea was arrested in February for an aggravated assault and a co-defendant arrested with Perea advised Perea got a group of friends together to shoot up a residence of somebody he was having problems with. The co-defendant further advised that during the shooting Perea stood in the open sunroof and fired multiple times into an occupied dwelling.

Based on the proceeding information, detectives believe the suspect clearly shows he is a risk to society and could likely commit violence if released from custody towards the living victims in this investigation.

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Printed Name Det. Daniel W. Frazier #5180 Signature /S/ Det. Daniel W. Frazier #5180

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

Judge

Circuit Court of _____ County, State of Missouri.