

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

Police# 15-064151
Prosecutor# 095426809
1516-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Joseph L. Nelson
3220 Highland Ave.
Kansas City, MO 64109
DOB: 09/30/1992; Race/Sex: B/M;
SS#**

Defendant.

Count I. Murder in the First Degree (10021990)

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 September 8, 2015, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Bianca Fletcher by shooting her.

Count II. Armed criminal action (31010990)

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 September 8, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the First 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 First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

Count III. Murder in the First Degree (10021990)

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 September 8, 2015, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Shannon Rollins by shooting him.

Count IV. Armed criminal action (31010990)

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 September 8, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder 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 Murder in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

Count V. Murder in the First Degree (10021990)

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 September 8, 2015, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of J.F., DOB: 8/18/14 by shooting him.

Count VI. Armed criminal action (31010990)

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 September 8, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree charged in Count V, 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.

Count VII. Burglary 1st Degree (14010990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 8, 2015, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in an inhabitable structure, located at 5915 E. 84th St., Kansas City, MO and possessed by Bianca Fletcher, for the purpose of committing assault therein, and while in such inhabitable structure the defendant was armed with a 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.

THE STATE OF MISSOURI

vs.

Joseph L. Nelson

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Rick Knight (#23368)
Assistant Prosecuting Attorney
415 East 12th Street 11th Floor
Kansas City, Missouri 64106
(816) 881-3555

WITNESSES:

Prosecuting Atty. Office, Kansas City, MO 64106
Fletcher Bianca, Prosecuting Atty. Office, Kansas City, MO 64106
DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
Prosecuting Atty. Office, Kansas City, MO 64106
J.F, Prosecuting Atty. Office, Kansas City, MO 64106
DET Bryan Jobe, 1125 Locust, Kansas City, MO 64106
DET Alex E Lepper , 1125 Locust, Kansas City, MO 64106
DET John S. Randle , 1125 Locust, Kansas City, MO 64106
Rollins Shannon , Prosecuting Atty. Office, Kansas City, MO 64106
PO Christopher S. Smith , 1125 Locust, Kansas City, MO 64106
PO George L. Springer , 1125 Locust, Kansas City, MO 64106

Amended

PROBABLE CAUSE STATEMENT FORM

Date: 9/17/2015

CRN: 15-64151

I, Det. John Randle #4804

(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 9/8/2015, at 5914 E 84th St in
(Date) (Address)

Kansas City, Jackson Missouri Joseph L. Nelson
(County) (Name of Offender(s))

b/m, 9/30/92, 5'6", 136lbs, s.s.# committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 9-8-15 at approximately 2125 hours, Kansas City Missouri Police Officers were dispatched to 5915 E. 84th St., Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, officers located three victims inside the residence deceased from apparent gunshot wounds; two adults, and one male infant. All three victims had multiple gunshot wounds. It was determined the male infant was the son of the deceased female, and the deceased adult male was the boyfriend of the deceased adult female. There were no signs of forced entry to the residence. While investigating at the scene, no shell casings were observed, and some of the adult victims' personal items had been removed from the residence.

Witness #1 stated that on 9/8/15 at approximately 2145 hours, he arrived at the residence of 5915 E 84th St., Kansas City, Jackson County, Missouri. Upon entering the residence, the witness discovered the two deceased adults and a deceased infant in the same room within the residence. The witness then ran from the residence and sought help from a neighbor. The witness identified the adult female victim's ex-boyfriend as Joseph L. Nelson, b/m, 9/30/92.

On 9/9/15 at approximately 1130 hours, Joseph L. Nelson, b/m, 9/30/92, responded to a local police station and reported two firearms, magazine, and ammunition stolen from his vehicle, a 1999 Buick four door.

Witness #2 stated Nelson arrived at the witness's residence on 9/8/15 at approximately 2330 hours, the witness observed Nelson standing by a grill on his residential property with flames coming from it. Nelson advised the witness he had robbed a store nearby and he was burning the clothes.

The KCPD Communications Unit confirmed no armed robberies were reported on 9/8/15.

Witness #3 stated that on the morning of approximately 9/9/15, Nelson advised the witness he had gone to the adult female victim's residence to "chill." Nelson stated he had an argument with the adult female victim, and she threw a diaper at Nelson, which struck him. Nelson advised witness #3 that Witness #4, who was in Nelson's company, shot the adult female victim. Nelson then stated, "I was there and saw it, so other things had to be done." Nelson then asked for advice on how to deal with what had happened. Nelson advised witness#3

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that he and Witness #5 had picked up and removed shell casings from the victim's residence. Nelson stated the firearm used in the shooting was sold to an individual. Nelson advised witness#3 he showered numerous times and washed his hands with bleach.

Witness #4 stated that on the evening of 9/8/15 he received a telephone call from Nelson at approximately 2130 hours. Nelson advised Witness #4 that he was on his way to pick the Witness #4 up and to "be ready." Witness #4 was then transported by Nelson to Nelson's residence in Kansas City, Jackson County, Missouri. Nelson then stated to the witness, "I did something bad. I did something I don't think I can live with." Witness #4 stated when he asked further, Nelson stated "I killed them. I killed them." Nelson then explained that he had driven to the adult female victim's residence (5915 E 84th St.) and had an argument with her, and the victim had thrown a diaper box at Nelson which struck him in the head. Nelson stated he "lost it" and shot the victim. Nelson provided details about where he shot the victim (consistent with the adult female's injuries.) Nelson then advised witness#4 he shot the adult female victim's boyfriend and her son. When Nelson was asked why he shot the other two, Nelson replied, "Witnesses." Nelson also described that the infant was crying and he didn't want neighbors to hear. Nelson provided witness#4 with personal effects from both victims and directed the witness to get rid of the items, which included a small bag which contained fourteen shell casings. The witness advised investigators that Nelson's report of the stolen firearms was not truthful, and that Nelson had sold the murder weapon, one of the firearms Nelson had reported stolen, to an acquaintance the same evening of the homicides. The witness also stated that Nelson burned a trash bag containing Nelson's and Witness #5's clothing on an outdoor grill at Nelson's residence.

It should be noted that during the execution of a Search Warrant at Nelson's residence on 9/16/15, burned fabric was observed in a grill on Nelson's residential property.

Witness #5 stated that on the evening of 9/8/15, Nelson drove into the driveway of 5915 E 84th St, Kansas City, Jackson County, Missouri, in his white Buick Century four door. Nelson then walked to the west entrance. Both the storm door and entrance door were observed closed. Nelson walked in unannounced. Nelson then presented a firearm and directed the victims, who were in the same room, to sit down. A verbal confrontation ensued between the adult female victim and Nelson. The adult female victim threw a household object at Nelson, but it did not strike him. Nelson then shot the adult female victim. Additional shots were fired within the same room. Witness #5 then observed the adult male and infant child lifeless on the floor of the residence. Nelson then directed witness #5 to assist him in picking up shell casings prior to leaving the residence.

On 9/16/15, Nelson was interviewed after he waived his Miranda Waiver Rights. Nelson stated that on the day the victims were discovered, he was asleep most of the day, and only left his residence briefly on that evening to pick up a relative, but then returned to his residence. Nelson denied any involvement in the deaths of the victims.

Printed Name Det. John Randle #4804

Signature  #4804

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

Judge

Circuit Court of _____ County, State of Missouri.