

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

POLICE NO. :	KC19054341
PROSECUTOR NO. :	095454129
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
WADE BENTLEY)	
Unknown)	CASE NO. 1916-CR
Kansas City, MO 64106)	DIVISION
DOB: 06/26/2001)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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 July 20, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Leon Robinson caused the death of Leon Robinson by shooting him.

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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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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 July 20, 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 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. 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. Unlawful Use of Weapon - Subsection 9 - Shoot at/from Motor Vehicle, at Person, Motor Vehicle or Building, Resulting in Death or Injury (571.030-015Y20145299.0)

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 A Felony of Unlawful Use of a Weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 20, 2019, at Roberts and Askew, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person, namely [REDACTED], and as a result of the above described conduct, [REDACTED] suffered injury or death.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of RSMo 571.030.1 shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

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 July 20, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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. 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. Unlawful Use of Weapon - Subsection 9 - Shoot at/from Motor Vehicle, at Person, Motor Vehicle or Building, Resulting in Death or Injury (571.030-015Y20145299.0)

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 A Felony of Unlawful Use of a Weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 20, 2019, at Roberts and Askew, in the County of Jackson, State of Missouri, the defendant, knowingly a firearm at another person, namely [REDACTED], and as a result of the above described conduct, [REDACTED] suffered injury or death.

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 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 July 20, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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. 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. 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 July 20, 2019, at Roberts and Askew, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person, namely [REDACTED]

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. 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 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 July 20, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon by, with and through, the knowing use, assistance and aid of a deadly.

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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. 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 11 - Possess Weapon and a Felony Controlled Substance (571.030-019Y20175299.0)

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 E Felony of Unlawful Use of a Weapon**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about August 7, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a firearm, to wit a Glock, .40 caliber handgun, while also possessing, cocaine a controlled substance, knowing of its presence and nature.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range of punishment for a class E 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 four (4) 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.

Count X. Possession of Controlled Substance Except 35 Grams or Less of Marijuana/Synthetic Cannabinoid (579.015-001Y20173532.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.015, RSMo, committed the **Class D Felony of Possession of a Controlled Substance**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 20, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed cocaine, a controlled substance, knowing of its presence and nature.

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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.

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/ Sarah A. Castle
Sarah A. Castle (#64770)
Assistant Prosecuting Attorney
415 East 12th Street, 11th Floor
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WITNESSES:

1. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. PO Eric V. Byers, 1125 Locust, Kansas City, MO 64106
3. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
4. SGT Kristina G. Goodin, 1125 Locust, Kansas City, MO 64106
5. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
6. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
7. [REDACTED]
8. [REDACTED] Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
9. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08-07-2019

CRN: 19-054341

I, Det. Mary Kincheloe #5063
(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 07-20-2019, at Roberts & Askew in
(Date) (Address)

Kansas City, Jackson Missouri Wade Bentley
(County) (Name of Offender(s))

B/M 06-26-2001 committed one or more criminal offense(s).
(Description of Identity)

- Murder
- Unlawful Use of a Weapon x 4
- ACA x 4
- Possession of Controlled Substance

The facts supporting this belief are as follows:

On 07-20-2019, Officers from the Kansas City, Missouri Police Department were dispatched to 3719 Independence Ave, Kansas City, Jackson County, Missouri, on a shooting call. Upon arrival a living male victim () was contacted who pointed Officers in the direction of Roberts and Askew as the location where the shooting took place and stated there were more victims over there. Officers located two living female victims (one shot, and one not shot,) and one deceased male victim, L. Robinson at Roberts and Askew. L. Robinson died from an apparent gunshot injury to the back of his head. and transported to an area hospital with gunshot injuries.

later responded to Police Headquarters to provide a formal statement. He stated the incident started at 3516 Independence Ave where he first encountered the suspect who accused of stealing marijuana. stated the suspect wanted to "box" him and suggested they go to a neutral place. stated he could tell the suspect was armed with a gun and did not want to engage with him. stated began a verbal altercation with the suspect. stated as they were walking and was arguing with the suspect, the suspect put his hands on . stated the L. Robinson told the suspect not to put his hands on and then turned to tell to calm down stated the suspect took a gun out and shot L. Robinson in the back of the head. stated the suspect then turned and started shooting at him and the two female victims, and . described the suspect as a thin black male, 5'2"-5'3", 125lbs., 17-18 years of age. He stated the suspect had short twists in his hair, a short moustache, braces on his teeth, and wearing a white tank top and black jogger pants. He stated he did not know the suspect's name.

responded to Police Headquarters to provide a formal statement. first encountered the suspect at an apartment located at 3516 Independence Avenue. When she arrived there with to visit , she said the suspect answered the door and appeared to be angry at for stealing the suspect's marijuana. described the suspect as being a thin black male, 5'03-5'04, 130lbs., with short twists in his hair. said the suspect has straight teeth, but has braces. said she saw the suspect armed with a chrome handgun in his waistband

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moments before he shot L. Robinson. She did not know his name and had never met him until the day of the homicide.

An anonymous TIP was received by KCPD detectives indicating "Little Chop" was responsible for the homicide.

Detectives conducted an area canvass at 3516 Independence Ave and contacted tenants of the building. Tenant #1 advised he saw the suspect whom he knew as "Chop" armed with a gray/black handgun with an extended magazine in his waistband. Tenant #1 stated he saw "Chop" retrieve the gun from his waistband while he was walking with [REDACTED] [REDACTED] and L. Robinson. Tenant #1 stated they then walked out of view just before he heard gunshots. Tenant #1 stated he heard "Chop" killed L. Robinson. Tenant #1 described "Chop" as having braces on his teeth.

Tenant #2 stated she saw "Chop" in the apartment building the day of the homicide with all the victims although she was not present during the homicide. Tenant #2 described "Chop" as a young B/M with short twists in his hair.

Tenant #3 stated she did not witness the homicide but knows a young B/M with short hair who goes by "Chop" who has been to the apartments. She provided the phone number 816-705-7192 as the phone number "Chop" gave her to contact him if she needed anything.

[REDACTED] responded to Police Headquarters to provide a formal statement. [REDACTED]'s statement was consistent with [REDACTED] and [REDACTED] statement in regard to the suspect being upset [REDACTED] owed him money for marijuana. [REDACTED] also stated the suspect wanted to fight [REDACTED] [REDACTED] stated she saw the suspect was armed with a silver gun in his waistband. [REDACTED] stated she was having words with the suspect as they walked away from the apartments when L. Robinson told the suspect not to disrespect [REDACTED]. The suspect said to L. Robinson, "You about to get your life took over a bitch." [REDACTED] stated L. Robinson turned to her to tell her to calm down. [REDACTED] saw the suspect take a gun (described as silver) out of his waistband and shoot L. Robinson in the back of the head. [REDACTED] stated the suspect continued to shoot and then she was shot in the leg. He then fled the scene on foot.

A phone order was obtained for the phone records and subscriber information for 816-705-7192 which responded back to **Wade Bentley (B/M; DOB: 06-26-2001)**.

Information was received by SRO Green #5470, **Bentley** was known to wear braces while at Southeast High School in October of 2018.

A photo line-up was generated with six black males similar in appearance. **Bentley** was in the #3 position and the rest of the spots contained unrelated fillers. JM positively identified **Bentley** as the person who shot him, [REDACTED] and who killed the deceased male victim, L. Robinson.

[REDACTED] was shown the photo line-up with **Bentley** in it and she also positively identified **Bentley** as the suspect who shot L. Robinson and her and continued shooting after she fell to the ground.

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On 08-07-2019, at 1615 hours, **Bentley** was arrested at Independence and Benton in possession of two cell phones, white rock-like substance, a Glock, .40 caliber handgun, and a black and gray bag. He was subsequently transported to 1125 Locust to be interviewed. At 1659 hours, **Bentley** was read aloud Miranda Rights. **Bentley** acknowledged he understood his rights and did not want to provide a statement.

On 08-08-2019, the white rock-like substance, weighing 30.5403 grams, was determined by the Kansas City Crime Laboratory to contain Cocaine (Scheduled II) in the base form.

Bentley is a danger to the community and a potential flight risk. I am requesting that a warrant be issued for **Bentley** and that bond be set for this offense for the following reasons:

The nature and circumstances of the offense indicate that **Bentley** is a danger to the community. This shooting took place in a residential neighborhood, on a Saturday, in the middle of the day. There were other civilians present, and in addition to the victims listed above, **Bentley** caused property damage to a residence and a vehicle near the scene with bullets from his firearm. He then fled the scene and was taken into custody weeks later.

Review of criminal databases reveal that **Bentley** has been identified as a subject of interest in other shooting incidents and assaults that have occurred in the Kansas City area. In addition to this offense, two of the shootings identified in criminal databases have occurred since March 2019. When **Bentley** was taken into custody on 08-07-2019, he was found to be in possession of a firearm and cocaine, which was in a form consistent with evidence of distribution. Although the handgun recovered from **Bentley** on 08-07-2019 was not identified as the homicide weapon, the above demonstrates that **Bentley** has access to firearms and is consistent with witness reports that he regularly possesses a firearm.

Printed Name Det. Mary Kincheloe #5063 Signature /s/Det. Mary Kincheloe #5063

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

Judge

Circuit Court of _____ County, State of Missouri.