

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

POLICE NO. :	KC19066300
PROSECUTOR NO. :	095454933
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
LARRY DODDS)	
3305 Wood Ave., #29)	CASE NO. 1916-CR
Kansas City, KS 66102)	DIVISION
DOB: 11/06/1997)	
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 August 31, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to , caused the death of Angela Banks by shooting at and hitting Angela Banks.

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

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571.015.1, RSMo, in that on or about August 31, 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. 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/ Daniel Portnoy
Daniel Portnoy (#62186)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Floor
Kansas City, MO 64106
(816) 881-3286
dportnoy@jacksongov.org

WITNESSES:

1. Angela Banks, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

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2. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106

3. [REDACTED]

[REDACTED]

64106

PROBABLE CAUSE STATEMENT FORM

Date: 09-14-2019

CRN: KC19066300

I, Detective 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 08-31-2019, at 73rd St and Indiana Av in
(Date) (Address)

Kansas City, Jackson Missouri Larry Dodds
(County) (Name of Offender(s))

B/M 11-06-1997 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08-31-2019 at 1819 hrs, officers were dispatched to 73rd St and Indiana – Noble Park – Kansas City, Jackson County, Missouri in regard to a shots fired call. While in route officers were updated that the call was now a shooting. Upon their arrival they were advised two victims had been transported to area hospitals via personal vehicles. It was later learned a female victim and male victim were transported to the hospital where the female victim was pronounced dead and the male victim was in critical but stable condition. When Officers arrived at 73rd St and Indiana they were directed to a large Pavilion located in the north west area of the park. In the Pavilion was food from what appeared to be a large cookout as well as purses, bags, baby bottles and diapers. In the center of the Pavilion was a single spent .45 caliber shell casing. Along the west side of the pavilion was a large pool of blood. A search of the area around the Pavilion revealed four (4) spent .45 caliber shell casings in an area south of the Pavilion. North of the pavilion near 73rd St three (3) spent .45 caliber shell casings were located. The Jackson County Medical Examiner’s Office ruled the victim’s death a homicide and advised the victim was shot in the upper right side.

Two witnesses were contacted who were present in the pavilion when the shooting occurred and stated the following:

The first witness stated that while a family cookout was in progress which had dozens of children and adults present. Two black males that they believed were distant family were also in attendance after being invited to the cookout through an uncle that was already present at the party. The two black males were sitting at a picnic table within the pavilion. The witness described one of them as a black male, thicker in size, with a short “afro” hairstyle wearing a white t-shirt. The second black male they described as a younger black male, thinner, with long dreadlocks, and a white t-shirt. The male victim was near the two black males rapping (music) with other family members when the two black males interjected themselves and began to “trash talk” the male victim at which point an argument started. The two black males brandished handguns causing the male victim to turn and begin running northbound from the pavilion towards 73rd St.. Immediately the black male with dreadlocks began chasing the male victim shooting multiple times at him while they were both running. At the same time the black male with the short afro style hair began to shoot multiple rounds along the south side of the pavilion. A few seconds later the black males both ran to a nearby vehicle and left the area in an unknown vehicle and direction. While this was going on the witness advised that adults and children were running all directions trying to get to safety. When the witness looked back at the pavilion they noticed the female victim lying on the concrete under the pavilion bleeding. The witness also advised that they could not tell what the suspect vehicle looked like or the direction it traveled because at that time everyone that had been in the pavilion were grabbing children and trying to run to safety and leaving the area. A family member then loaded the female victim into a car and drove towards the hospital.

The second witness stated that while at a family cookout. They observed two black males that were distant family at the gathering. They knew the black males were distant family because they had seen them in the past at different family functions although they did

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not really know them. The two black males were sitting at a picnic table within the pavilion. The witness described one of them as a black male, thicker in size, with a short "afro" hairstyle wearing a white t-shirt. The second black male they described as a younger black male, thinner, with long dreadlocks, and a white t-shirt. The male victim was near the two black males rapping (music) with other family members when the two black males interjected themselves and began to "trash talk" the male victim. During the trash talk the black male with dreads acted like he was going to hit the male victim which escalated the confrontation and at which point the two black males brandished handguns causing the male victim to turn and begin running northbound from the pavilion towards 73rd St.. Immediately the black male with dreadlocks began chasing the male victim shooting multiple times at him while they were both running. At the same time the black male with the short afro style hair began to shoot multiple rounds along the south side of the pavilion in an unknown direction. A few seconds later the black males both ran to a nearby silver vehicle and left the area northbound on Indiana Av. The witness noticed the female victim lying on the concrete under the pavilion bleeding. The witness also advised that they could not tell what the suspect vehicle looked like because of the chaos at that time everyone that had been in the pavilion were grabbing children and trying to run to safety and leaving the area. A family member then loaded the female victim into a car and drove towards the hospital.

During the investigation an anonymous source advised detectives that the black male with the short afro was known as Larry Bennett on Facebook and the black male with the dreads was known as [REDACTED] on Facebook. The source believed they were either brothers or cousins.

Detectives located both Facebook pages which were preserved for possible evidence and through police databases were able to identify the Larry Bennett on Facebook as Larry Dodds JR B/M 11-09-1997 and [REDACTED] on Facebook as [REDACTED] B/M 12-05-2002 (Juvenile). With those names two separate photo arrays were created and shown to the two above witnesses.

The first witness reviewed a photo array which contained Larry Dodds and quickly positively identified Larry Dodds as the black male with the short afro and shooting a gun on the south side of the pavilion. They also reviewed the second photo array which contained [REDACTED] and positively identified [REDACTED] as the black male with long dreads and chasing after the male victim northbound shooting at him while running, likely striking the male victim.

The second witness reviewed a photo array which contained Larry Dodds and quickly positively identified Larry Dodds as the black male with the short afro and shooting a gun on the south side of the pavilion. They also reviewed the second photo array which contained [REDACTED] and positively identified [REDACTED] as the black male with long dreads and chasing after the male victim northbound shooting at him while running.

Also during the investigation information was developed that some parts of the family gathering were documented via video and posted to Facebook Live. Those videos were obtained by the police department and reviewed. While reviewing the video dozens of kids and adults are observed spending time together in the Noble Park pavilion. The deceased victim is seen sitting in a chair near a south west picnic table rapping to friends and family. Sitting across from the victim was a black male with a short afro and a younger black male with long dreads next to him. Seen sitting on the black males with dreads lap is a young black female who was unable to be identified. No arguments or shooting is captured on the video.

On 09-10-2019 an associate of Larry Dodds was contacted. That associate confirmed that Larry Dodds who they calls "Ls" was the black male seen on the Facebook live video sitting at the picnic table across from the female victim with the short afro. The associate also advised that the male victim was known to associate with a group of people that were thought to have killed a friend of Larry Dodds in KCK a week or two prior and indicated that could have been what escalated the argument.

On 09-14-2019 Larry Dodds was arrested. He was transported to Police Headquarters for questioning and waived his Miranda Rights. When asked how he arrived at the party Dodds requested his attorney at which point the interview was stopped.

Dodds poses a threat to the community because he was willing to use a weapon in a crowded pavilion, surrounded by people and children uninvolved in his altercation with the male victim in this case. Despite the presence of those people and children, Dodds fired his weapon multiple times, striking and killing the female victim. Dodds additionally has plead guilty to two felonies in the past, both as part of case number 1516-CR00181. One of those felonies was resisting a lawful stop, indicating that Dodds is a flight risk. In

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addition, the current charges are serious, and put Dodds at risk of a lengthy prison sentence, providing an incentive to flea. Based on his criminal history, incentive to flea and behavior in this case making him a threat to the community, a warrant should be issued.

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

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

Judge

Circuit Court of _____ County, State of Missouri.