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

POLICE NO · KC19079921

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PROSECUT	TOR NO. :	0954556	502
	OCN:		
STATE OF MISSOURI,	PLAI	NTIFF,	DIVISION
VS.		,	
LYNNSEY D JONES))
5847 Elmwood Ave.		`	CASE NO. 1916-CR
Kansas City, MO 64130		`)
DOB: 09/05/1984)
Race/Sex: B/F)
		``))
VICTOR SYKES 4931 Woodland Ave.		· ·) CASE NO. 1916-CR
) CASE 110: 1710-CA
Kansas City, MO 64110 DOB: 11/10/1975) \
Race/Sex: B/M)
Race/Sex. D/M)
	DEFEN	DANT.	,)

AMENDED <u>COMPLAINT</u> WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 on or about October 17, 2019, in the County of Jackson, State of Missouri, the defendants after deliberation, knowingly caused the death of Larona T Jones by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder

in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years 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 571.015.1, RSMo, in that on or about October 17, 2019, in the County of Jackson, State of Missouri, the defendants committed the felony of murder in first degree charged in Count One, 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.

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. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 on or about October 17, 2019, in the County of Jackson, State of Missouri, the defendants after deliberation, knowingly caused the death of Brandy Jones by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of

probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

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 571.015.1, RSMo, in that on or about October 17, 2019, in the County of Jackson, State of Missouri, the defendants committed the felony of murder in first degree charged in Count Three, 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.

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. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 on or about October 17, 2019, in the County of Jackson, State of Missouri, the defendants after deliberation, knowingly caused the death of Larry T Barnes Jr by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of

probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

Count VI. 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 571.015.1, RSMo, in that on or about October 17, 2019, in the County of Jackson, State of Missouri, the defendants committed the felony of murder in first degree charged in Count Five, 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.

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/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney

321 West Lexington Avenue Independence, MO 64050

(816) 881-4592

jbaldwin@jacksongov.org

WITNESSES:

- 1. Larry T Barnes Jr, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 2. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
- 3. DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106
- 4. Brandy Jones, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 5. Larona T Jones, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 6. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
- 7. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
- 8. DET James H. Price, 1125 Locust, Kansas City, MO 64106
- 9. SGT Richard D. Sharp, 1125 Locust, Kansas City, MO 64106
- 10. MO 64106
- 11. DET Timothy R. Taylor, 1125 Locust, Kansas City, MO 64106
- 12. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

Date: 10-18-2019	CRN: 19-079921
I, Detective Bonita Cannon, #4585, Kan	sas City Missouri Police Department
(Name and identity law emorcement officer, o	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 _	10-17-2019 , at 4526 South Benton Avenue in (Address)
Kansas City, Jackson (County)	Missouri Victor Sykes (Name of Offender(s))
	(- :::::to of offender(s))
B/M 11-10-75/	committed one or more criminal offense(s).
(Description of Identity)	

The facts supporting this belief are as follows:

Date: 10-18-2019

On 10-17-2019, at 2053 hours, Officers of the Kansas City, Missouri Police Department were on patrol in the area of 45th and South Benton Avenue, when they heard the sound of gunshots. As the officers were driving in their marked patrol vehicle, they observed a female, who appeared to have a rifle in her hands and male walking from 4526 South Benton Ave. The female got into a black sedan and the male ran from the scene. The female, who was later identified as Lynnsey Jones (b/f, 09/05/1984); was taken into custody without incident. An Olympic Arms, MFR 5.56, was located and recovered from inside of the Chevrolet Impala, that officers observed Jones entering on the passenger side. An additional Officer pursued the male suspect, who was later identified as Victor Sykes (b/m, 11/10/1975). Sykes was taken into custody after a short foot pursuit in the rear of 4542 Chestnut. Sykes was observed wearing brown cloth gloves and had what appeared to be blood and a laceration on his left hand and wrist. Sykes clothing had what appeared to be dirt on his gloves and pants.

As both suspects were taken into custody officers observed a male victim lying in the street with no apparent signs of life in front of a maroon SUV at 4530 South Benton Avenue. Rifle shell casings were recovered from near the victim. Officers noticed the front door to 4526 South Benton Avenue to be ajar, and a party down inside. Officers entered 4526 South Benton Avenue to render aid to the second victim, who was obviously deceased from an apparent head injury. It was at that time they also observed a third victim in the residence also obviously deceased from an injury to her head.

A witness was identified at the scene and stated he heard the gunshots and went outside of his residence. The witness stated upon doing so he observed an unknown male on top of the male victim striking him with his fist. The witness stated he observed the female suspect approaching, when the male suspect, later identified as Sykes, yelled "Shoot him baby, shoot him." The witness stated he then observed the female suspect shoot the male victim several times as he was on the ground. The witness stated the same male that beat the male victim and told the female suspect to shoot, was the same male that ran from the officers.

The crime scene, at 4526 South Benton Avenue was processed with numerous 5.56 caliber spent shell casings recovered.

The reporting detective was notified by the KCPD Firearm Laboratory the requested comparisons are determined that the 5.56mm cartridge cases recovered from the scene were fired in the recovered Oldrearm.	nd ympic Arms

CRN 19-079921

A computer check of the displayed license plate on the black 2011 Chevrolet Impala responded back registered to Tiffany Sykes. Jones stated the Chevrolet Impala belongs to her boyfriend, Victor Sykes.

After being transported to Police Headquarters and made aware of her Miranda Rights, Jones stated she had gone to 4526 South Benton Avenue to purchase narcotics. Jones stated while waiting for the narcotics she purchased; she went inside of the residence and smoked Marijuana with two unknown females. After doing so she went back outside and observed the two males in a "heated" conversation on the front porch. At some point one male shot the other and handed her the rifle. Jones denied Sykes was at the scene. She was adamant Sykes was at her residence. Jones was asked why her boyfriend was fighting, to which she replied, "I don't know why." Jones stated after being informed Sykes was in custody, the rifle was hers and she shot and killed all three victims. When asked, Jones stated she did not know why she shot the victims. Jones did not elaborate on shooting the victims. When asked why she shot the victims, she responded, "Because I'm a bad person."

After being transported to Police Headquarters and made aware of his Miranda Rights, Sykes stated he was at the scene, walking with the male victim, when he heard gunshots. Sykes stated he hid then behind an unknown vehicle. He further stated when he saw officers detaining Jones; he attempted to flee the scene on foot. Sykes denied any involvement in the homicides.

The case Detective is requesting an arrest warrant in lieu of a summons for the listed offender as a firearm was used in this offense. "Sykes" has had prior contacts with law enforcement Officers and is currently on Parole for Murder. In light of the recent incident and his recent conduct the case Detective believes the offender is a danger to himself and the public.

Printed Name	Det. Bonita Cannon,	#4585	_ Signature _	A	et Sy	0 44585
The Court finds	s probable cause and d	irects the issuance	of a warrant	t this	day of	·
		Jud	ge		-	
	Circuit Court of _		Coı	unty, State	e of Missouri	

firearm.

		CRN: 19-0/9921		
I, Detective Bonita Cannon, #4585, Ka	nsas City Missouri Po	olice Department		
(Name and identify law enforcement officer,	or person having information	ation as probable cause.)		
		aw, state that the facts contained herein are true.		
I have probable cause to believe that on	10-17-2019 (Date)	, at 4526 South Benton Avenue in (Address)		
Kansas City, <u>Jackson</u> (County)	Missouri Lynnsey	D. Jones (Name of Offender(s))		
B/F 09-05-1984 / XXX-XX-2504 (Description of Identity))	committed one or more criminal offense(s).		

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CRN 19-079921

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Printed Name Det. Bonita Cannon	#4585 Signature (4585)	585
The Court finds probable cause and c	irects the issuance of a warrant this day of	
	Judge	
Circuit Court of _	County, State of Missouri.	