

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

POLICE NO. :	19-087713
PROSECUTOR NO. :	095456334
OCN:	HS015557

STATE OF MISSOURI,

PLAINTIFF,)

VS.

JHERMEIL R. TAYLOR

9214 Corrington Ave.

Kansas City, MO 64138

DOB: 10/10/1988

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 November 15, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Gerald D. Berry caused the death of Gerald D. Berry by shooting him.

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 (571.015-001Y19755299.0)

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 November 15, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second

State vs. Jhermeil R. Taylor

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 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 facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Jordan R. Bergus

Jordan R. Bergus (#64729)
Assistant Prosecuting Attorney
415 East 12th Street
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WITNESSES:

1. Gerald D. Berry, Pros. Atty's Office, 415 E. 12th St., Kansas City, MO 64106
2. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 12/03/2019

CRN: KC19-087713

I, Detective Danny Thomas #4933

(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 11/15/2019, at 7510 E. 87th Street in
(Date) (Address)

Kansas City, Jackson Missouri Jhermeil R. Taylor
(County) (Name of Offender(s))

B/M, 10/10/1988 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

Murder II ACA

On 11/15/2019 at approximately 2357 hours, officers of the Kansas City, Missouri Police Department were dispatched to the Cloud 9 Liquor Store located at 7510 E. 87th Street in regard to a reported disturbance with a weapon.

Upon arrival they observed a black male lying on the ground in the parking lot, suffering from an apparent gunshot wound. He was transported to an area hospital where he died from his injuries. The case was subsequently ruled a homicide.

During the course of the investigation detectives retrieved surveillance video from the Cloud 9 Liquor Store. The surveillance video depicts an individual wearing a gray long sleeved shirt, another individual wearing a red hooded sweatshirt (victim) and a third individual wearing a yellow Old Navy sweatshirt (suspect) involved in conversation. The suspect wearing the yellow sweatshirt was later identified as **Jhermeil R. Taylor, black male, 10/10/1988**. The conversation escalates into an argument between the man in the gray shirt and Taylor. The victim is depicted raising his hand in an apparent attempt to diffuse the situation; however the man in the gray shirt throws a punch at Taylor who ducks away. Taylor subsequently pulls out a handgun and shoots, striking the victim. The victim subsequently pulls a handgun from the pouch of his hoodie and fires shots towards Taylor as he runs away. Taylor fired several more shots towards both parties as he ran, entered a silver Kia Soul and drove away.

During his interview the man in the gray shirt (witness) stated he had gone to Cloud 9 with his girlfriend (witness #2), his son, his son's cousin and his girlfriend's daughter to get some snacks. He stated the suspect contacted him via cellphone (816-209-8673) in an attempt to meet up and hang out. He stated the suspect is a friend of his younger cousin. The witness stated Taylor was upset because when he drove by the first time he didn't stop. The witness stated when he arrived at Cloud 9 his cousin (victim) and another friend pulled up at about the same

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time. He stated they were talking when Taylor approached them. He stated Taylor was already aggressive and agitated calling him a, "bitch ass nigga" and saying he was soft. The witness stated the victim was attempting to calm everyone down. The witness stated he saw Taylor, "fumbling" in his pocket for a weapon. He stated Taylor began threatening him saying, "I'll fuck you up!" The witness stated he recognized Taylor did, in fact, have a gun so he became frightened and punched him. He stated he heard gunfire and got out of the way. He stated the victim began to shoot back at the suspect. He stated the suspect fled the scene and he attempted to help the victim. The witness stated he grabbed the victim's gun but it was jammed. He stated he left the gun in the victim's car and fled the scene because he was scared.

During his interview the witness viewed a photographic lineup consisting of six black males similar in appearance with Taylor in the #2 position. The witness positively identified Taylor as the suspect.

Witness#2 stated she was with her boyfriend (witness), his son, his son's cousin and her daughter. She stated the suspect called and was trying to "talk" (hook up) with the witness. She stated they stopped by Cloud 9 to get some snacks. Witness #2 stated they encountered some friends and relatives in the parking lot. She stated Taylor walked up, "all tense". She stated she could tell he had a gun in his hoodie so she got out of the car and stood in front to block the kids from what was occurring. She stated Taylor was threatening everyone and the witness was telling him to leave. Witness #2 stated the victim was telling everyone to chill out. She stated the witness punched Taylor and Taylor pulled out his gun and began firing, "recklessly". She stated she believed the victim also had a gun but she started running to avoid the gunfire and wasn't sure.

During her interview witness #2 viewed a photographic lineup consisting of six black males similar in appearance with Taylor in the #2 position. The witness positively identified Taylor as the suspect.

Witness #3 stated she was with Taylor in a silver Kia Soul. She stated they were meeting someone at the Cloud 9 Liquor Store to buy some weed (marijuana). She stated Taylor got into an argument with the guy and the guy tried to punch him. Witness #3 stated another individual who was with the person selling marijuana pulled a gun and started shooting. She stated Taylor also began shooting. She stated she was sitting in the passenger front seat of her vehicle and she got out and hid behind the rear wheel because she heard a bullet strike the car. She stated she got back into the vehicle along with Taylor. Witness #3 stated they drove to Taylor's mother's house nearby where she dropped him off and went home.

During the interview witness #3 viewed a single photograph of Taylor. She identified him as the person she was with and was involved in the shooting.

On 12/03/19 Taylor responded to Police Headquarters with his attorney. He was advised of his Miranda Rights and refused to provide a statement.

It should be noted both witnesses denied attempting to sell marijuana to the suspect.

PROBABLE CAUSE STATEMENT FORM

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Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

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

Judge

Circuit Court of _____ County, State of Missouri.