

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

POLICE NO. :	KC20002513
PROSECUTOR NO. :	095457010
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

BRANDON PETSCH

310 W 98th Street

Kansas City, MO 64114

DOB: 06/01/1983

Race/Sex: W/M

DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y19840901.0)

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 January 11, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Georgia Petsch caused the death of Georgia Petsch by shooting her.

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.

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 January 11, 2020, 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.

State vs. Brandon Petsch

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 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/ Brady X. Twenter

Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
415 E. 12th St.
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BTwenter@jacksongov.org

WITNESSES:

1. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
2. PO Charles E. Goodwin, 1125 Locust, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
5. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
6. [REDACTED]
7. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01/11/2020

CRN: KC20002513

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 01-10-2020, at 310 West 98th Street in
(Date) (Address)

Kansas City, Jackson Missouri Petsch, Brandon J.
(County) (Name of Offender(s))

W/M 06-01-1983, 5'10". 215lbs, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Murder
Armed Criminal Action

The facts supporting this belief are as follows:

On 01-10-2020, at 1507 hours, Officers of the Kansas City Missouri Police Department were dispatched to 310 West 98th Street on a reported check the welfare. Upon arrival, Officers met the calling party who advised based off conversations with his son over the phone, he believed him to be suicidal. He said his son and daughter-in-law were not answering either of their phones which caused more concern. The residence, belonging to his son and his wife was secure when officers arrived, but the calling party forced entry. Upon entry, apparent blood was visible throughout the residence as Officers cleared it. In the southeast corner bedroom, Petsch, Brandon J. W/M 06/01/1983 (son of the calling party) was found to be unresponsive in his bed with a firearm underneath his head. Petsch was transported to an area hospital for treatment. An unknown deceased victim was located in the northwest bedroom rolled up in an area rug.

I observed a wedding photo of a male and female as well as several other photos of the same couple throughout the residence. I observed a Missouri Driver's license for Petsch and a female identification card which was later determined to be that of the victim, the wife of Petsch.

A search warrant was executed on the crime scene for the collection of evidence. In the kitchen, a mop with apparent blood on it, an empty Pinesol bottle, 2 empty bottles of sleep aid capsules, and a small yellow paper notepad in the trash. In the dining room area, on several pieces of wooden furniture, I observed spattered, transferred and/or dripped blood stains. I observed apparent hand impressions in the blood on several of these furniture items. The floor appeared to have been saturated with blood, as it had dripped through the floor and into the basement/garage floor, but had since been mopped up. In the bathroom, there was a defect on the west wall, a spent casing on the floor, a broken and blood stained toilet seat/lid and a spent bullet in the bathtub. I observed apparent blood spatter on a cabinet above the toilet and blood on and around the toilet bowl. I observed a chevron pattern shoe impression similar to an apparent shoe impression in the dining room. There was no evidence of a cleanup in the bathroom.

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In the spare bedroom of the northwest corner of the residence, the body of a female victim was located rolled up in an area rug. She was found to have defects in her head, blood on her hands, and on her shoes. She had apparent bruising to both orbital sockets. Two tennis shoes with a Chevron pattern on the soles were located wrapped up with the victim.

On top of the dining room table, in plain view, I observed 2 black firearms both which appeared to have blood on them and (34) yellow notebook pages of a hand-written note. The note is presumably written by a male about his female spouse and the events that took place in their residence over an extended period of time that ended with her death at his hands.

It reads, "This I feel was not a murder/ suicide." "Makes sense I guess to start off with how it began and the events that followed." The person writing the note describes his wife as arriving home from work and the two arguing about beer and him being "lazy" due to unemployment. He wrote he called her a "cunt" and "incompetent." She hit him in the face and he grabbed her by her hair "to control her" while elbowing her in the back of the head. In anger, he believed she retrieved her firearm from a closet. According to the writer, the victim began to raise her firearm at him, but he retrieved his readily available firearm from the kitchen counter and raised his toward her in the same manner. The writer described he was able to slap the gun out of her hand and it landed underneath the dining room table. The writer stated, his wife then dove to retrieve the firearm, but he had ahold of her leg and shot her in her leg to successfully prevent her from retrieving the firearm. He writes her firearm is now a "couple feet" away from her, therefore he ordered her at gun point to not "fucking move". The writer stated there was a "certain level of threat to my life." She went from underneath one side of the table without retrieving the firearm to the other side near the front door (consistent with the apparent blood transfer from the lower portions of the chair legs and the underside of the tabletop). The writer stated in hindsight he believed his wife's next actions are out of fear rather than anger. A physical altercation continued into the bathroom where the writer stated his gun "went off" while they were entangled, shooting her a second time. He then demanded his wife "get the fuck down" to which she complied and raised her arms. The writer then stated his wife asked for a towel to wipe her face because she was unable to see. As he reached for a towel, she lunged toward the gun that was previously described as being underneath the table. He writes, "I then made the choice I can't ever truly describe. I fired a third round at her head. "I didn't want there to be anymore pain. So like I said, I made it a head shot." The writer described what appears to be "24" or possibly "34" hours had passed and he had not called the police. He writes he can no longer look at her, so he moved her to the spare bedroom (consistent with where police found her body rolled in an area rug). The writer concluded the note with a timestamp of 5:47AM with an apology for his actions and his desire to end his life. This letter was consistent with evidence at the crime scene and the condition in which he was found.

Detectives responded to the hospital where Petsch was transported and were advised Petsch would be admitted. Due to his condition, Petsch was unable to provide a statement.

On 01-11-2020, a body examination was conducted at the Jackson County Medical Examiner's office which revealed the victim to have defects to the areas of her body described within the letter.

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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.