IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT</u>

POLIC	E NO.:	18-0983	365
PROSECUTO	R NO.:	0954500	040
	OCN:		
STATE OF MISSOURI,)
	PLAI	NTIFF,)
VS.)
)
STEVEN T KELOW)
2200 E. 59th Street) CASE NO. 2016-CR
Kansas City, MO 64130) DIVISION
DOB: 03/03/1988)
Race/Sex: B/M)
)
	DEFEN	DANT.)
		T ATNIT	П

COMPLAINT

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 December 22, 2018, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, with the purpose of causing serious physical injury to Cornell A Reed, caused the death of Cornell A Reed 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 (571.015-001Y19755213.0)

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 December 22, 2018, 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/ Jennifer S Tatum

Jennifer S Tatum (#70789) Assistant Prosecuting Attorney 415 E. 12th Street Floor 7M Kansas City, MO 64106 (816) 881-3628 jtatum@jacksongov.org

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WITNESSES:

- 1. Richard Buchanan, 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. Joann Carter, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 4. DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106
- 5. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
- 6. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
- 7. DET James H. Price, 1125 Locust, Kansas City, MO 64106
- 8. Cornell A Reed, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 9. DET Timothy R. Taylor, 1125 Locust, Kansas City, MO 64106
- 10. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 12-28-2018		CRN: 18-098365				
I, Det. Ryan Taylor, #5585, Kansas Ci	ty, Missour	i Police Dep	artment Homicide U	nit		
(Name and identify law enforcement officer			,			
knowing that false statements on this for	rm are punis	shable by lav	w, state that the facts	contained herei	n are true.	
I have probable cause to believe that on		ate)	, at 55 th & Prospect	Avenue Address)	in	
Kansas City, Jackson	Missouri	Steven Tyr				
(County)			(Name of Offer	nder(s))		
B/M 03-03-1988 (Description of Identity	y)		committed one or m	nore criminal of	fense(s).	
• Murder						
 Armed Criminal Action 						

- ned Criminal Action
- Unlawful Use of a Weapon
- Felon in Possession of a Firearm

The facts supporting this belief are as follows:

On 12-22-2018 at approximately 1850 hours, officers with the Kansas City Missouri Police Department were dispatched to the area of 55th and Prospect Ave, Jackson County, on a reported shooting. Crime scene located and recovered eleven 9 mm casings and two .380 casings. The victim was transported to Research Medical Center with a gunshot wound to the head. The victim was declared brain dead on 12-23-2018 at 2057 hours and once the victim was excabated his official time of death was on 12-23-2018 at 2211 hours. The Jackson County Medical Examiner's office responded and it was ruled as a Homicide.

Surveillance video was recovered from multiple locations and suspects were developed. It was determined a verbal argument had occurred inside and outside the Party Stop liquor store located at 5312 Prospect between the victim and an occupant of a small maroon sedan. The small maroon sedan left the parking lot North on Prospect and circled around the block to 55th Street and drove past the victim walking Northbound. Muzzle flashes are observed from the driver's side rear passenger seat and the victim fell to the ground.

On 12-24-2018, the driver of the vehicle, witness #2 JC, was identified and a car stop was conducted. The witness and Kelow were contacted. JC stated the following: on the day of the shooting she went to the Party Spot with her sister, JB, and JB's son, Steven Kelow and his brother "Rich" identified as Corey Richardson B/M 02-18-1991. She stated Rich told JB and her son to get in another relative's vehicle after the verbal argument with the victim. JC stated Kelow was in the front passenger seat and Richardson got into the rear driver's side seat. JC stated they left the parking lot and turned NB on Prospect, then West on 54th St and South on Wabash. During this time, Kelow got in the back seat with Richardson. She then turned East on 55th through the Family Dollar parking lot to avoid the light. She stated as she drove past the Victim she heard gunfire from the inside of her

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vehicle. She said it sounded like it was coming from one gun from the backseat of her car. After the shooting, she was yelling asking "why did they do that" and both Kelow and Richardson said "we did what we had to do". They drove back to the relative's house on Park and have not spoken about the incident since it occurred. JC provided consent for the vehicle and it was processed.

Kelow was interviewed and he stated Richardson, his brother, got into a verbal argument with the victim. Once they left the parking lot, they went back to his uncle's house on Park. He acknowledged his sister and nephew had been with them when they arrived at the liquor store but stated she got into the uncle's vehicle because she wanted to go somewhere else. However he also stated his sister was at his uncle's house when they arrived after leaving the store. Kelow denied being in the back seat, denied that they drove around the block and denied knowledge of the gun that was found in the maroon car when it was stopped.

During the processing of the Maroon vehicle a .380 Hi-Point hand gun loaded with live rounds in the magazine was found underneath the driver's seat towards the driver's rear passenger floor board. A box of .380 ammunition, and live .380 rounds were found outside the driver's side door when it was stopped. Print's belonging to Kelow and Richardson were located on the .380 ammunition box and identified by the KCPD crime lab.

On 12-27-2018, Richardson was arrested at 5143 Wabash and was taken to Police Headquarters for a formal statement. Richardson stated that he was over at his Uncle Charles' house at 5618 Park Avenue. Richardson stated he and his relatives decided to go to the liquor store located at 53rd and Prospect. Richardson stated he was a passenger (seated behind the driver) with his sister, Janie and his nephew, Lorenzo was in the back seat. His brother, "Tyrone" (identified as Steven Tyrone Kelow) was in the front passenger seat with his girlfriend, JoJo driving. Richardson stated he purchased a 12 pack of beer, went outside and waited for his family "to come out of the store all right." Richardson stated there were no issues in the store, or during the drive back to his uncles. When shown photographs of a firearm that was recovered from the vehicle, Richardson stated we did not get the gun on or from him and we can't put it on him. Richardson stated he did not shoot anyone.

Richardson stated he was in the backseat behind Kelow, who was in the front passenger. Richardson stated JoJo was driving. He further stated at some point Kelow ended up in the backseat, behind the driver, with him. Richardson further stated "everything happened so fast. Richardson stated Kelow shot the victim from the backseat of the vehicle. He also stated Kelow wasn't trying to kill the victim, their intentions were to scare the victim. Richardson stated he could not recall if they discussed going back or scaring the victim. Nor he could he recall how or when Kelow got in the backseat of the vehicle with him.

On 12-27-2018, witness #2 voluntarily responded to police headquarters to provide another statement. Witness #2 stated that she in fact did see both Kelow and Richardson with a gun, and observed Kelow and Richardson shoot out of the vehicle. Witness #2 stated she head 9 or 10 shots. When asked what she observed, witness #2

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stated Kelow and Richardson were in the back seat of her vehicle. Kelow was sitting behind witness #2, and Richardson was sitting behind the front passenger seat. Witness #2 looked in the rear view mirror and observed them shooting. Witness #2 stated that the gun that the police found in her vehicle belonged to Kelow. Witness #2 stated that Kelow was a felon and she knows that he was not supposed to own a firearm.
Detectives responded to Jackson County Jail to speak with Kelow, who advised that he did not wish to provide an additional statement.
Investigation revealed Kelow to have three prior felony convictions through the Jackson County, Missouri Circuit Court. Case number 0816CR0392601 is a conviction on 11-07-2008 for 2 nd Degree Robbery, a class B Felony. Case number 0716CR0598201 is a conviction on 04-07-2008 for Unlawful Use of a Weapon, a class D Felony. Case number 0816CR0251601 is a conviction on 11-07-2008 for Possession of a Controlled Substance, a class C Felony.
Printed Name Det. Ryan Taylor, #5585 Signature 1.11. Signature 1.5585
The Court finds probable cause and directs the issuance of a warrant this day of
Judge
Circuit Court of County, State of Missouri.