

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	20-22380
PROSECUTOR NO. :	095458560
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JASON A. BELSHE JR.)	
10301 E US Hwy 40, rm 116)	CASE NO. 2016-CR
Independence, MO 64055)	DIVISION
DOB: 03/23/2002)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y19840999.0)

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 April 3, 2020, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Nikolas Lampton by shooting him and the defendant is further given notice that should the State submit murder in the second degree-felony murder under Section 565.021(2) RSMO., it will be based on the death of Nikolas Lampton as a result of perpetration of the class A felony of robbery in the first degree under section 570.023, RSMo., committed by the defendant.

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.

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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 April 3, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the 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. Robbery - 1st Degree (570.023-001Y20171299.)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 3, 2020, in the County of Jackson, State of Missouri, the defendant forcibly stole a handgun in the possession of Nikolas Lampton, and in the course thereof defendant was armed with a deadly weapon.

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.

State vs. Jason A. Belshe Jr.

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 April 3, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count Three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of robbery 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 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/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
321 West Lexington Avenue
Independence, MO 64050
(816) 881-4592

State vs. Jason A. Belshe Jr.

jbaldwin@jacksongov.org

WITNESSES:

1. [REDACTED]
2. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
3. DET Stephen Cook, 223 N. Memorial Drive, Independence, MO 64050
4. PO Zachary Hankins, 223 N. Memorial Drive, Independence, MO 64050
5. PO Nicholas Langsdale, 223 N. Memorial Drive, Independence, MO 64050
6. CST Jason Myers, 223 N. Memorial Drive, Independence, MO 64050
7. CST Dale Perry, 223 N. Memorial Drive, Independence, MO 64050
8. PO Sean Warren, 223 N. Memorial Drive, Independence, MO 64050
9. PO Jamie Welsh, 223 N. Memorial Drive, Independence, MO 64054

PROBABLE CAUSE STATEMENT

Date: 4/4/2020

Report #: 20-22380

I, Steve Cook, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 04-03-20, at 1302 hours, Jason , (Race- B, Sex- M, DOB- 03-23-02, Address-10301 E. US 40 Highway, Room #16, Independence, MO. 64055 [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 04-03-20 at approximately 1302 hours, Independence Police Officers responded to 324 Sundown Drive, Independence, Jackson County, Missouri in reference to shots fired. The calling party, later identified [REDACTED] advised that a white male was down by a white Dodge minivan. As officers arrived on scene they located the victim on the ground next to a still running white Dodge Caravan Sport, bearing Missouri license plate TC7-59F. The victim was deceased and beyond medical help. A crime scene perimeter was established and officers began seeking witnesses.

Witnesses on-scene described the suspect as black male wearing a black jacket with a red hooded sweatshirt underneath, dark pants and red / white tennis shoes. Witnesses observed the suspect flee into apartment 518 Sundown Drive. Officers approached 518 Sundown Drive. As they were approaching the apartment, officers encountered the apartment tenant returning home. Officers informed the tenant of the circumstances surrounding this incident. The tenant opened the doors and five subjects were called out of the apartment before being detained. Officers then entered the apartment to secure it pending a search warrant. Officers observed clothing similar to what the alleged shooter was wearing in a back bedroom in plain view.

Surveillance video maintained by the Sundown Apartment Complex was reviewed. High quality video captured various angles of the incident. In review, the incident showed Lampton and the subject walk from the vehicle that Lampton arrived in and to go between the 400 and 500 building. The subject is observed to be walking in front of Lampton, and then begins to walk to the side of Lampton. Then subject is then seen pulling something from his pocket and pointing it at Lampton. Lampton's hands are down and it doesn't appear as if he made any motions with his hands. Lampton's left hand appears to be down to his side and his right hand is not visible on camera. Lampton appears to hand the subject something, which the subject takes. Lampton's hands appear to then go up in a surrendering fashion and Lampton turns to walk away. As Lampton's back is turned it appears as if the first shot is fired. Additional shot(s) are fired as Lampton begins to run away. The subject also begins to run away.

Video also showed the suspect running into 518 Sundown Drive. In review, the video shows no one leave 518 Sundown Drive up to the point officers arrive and begin calling subjects out of the apartment.

[REDACTED] the victim's friend advised that he and the victim drove to the apartment complex in the aforementioned white Dodge Caravan Sport. [REDACTED] said that the victim was driving the van and the victim went to the location to trade an ounce of marijuana and \$400.00 for a tan assault rifle and a Smith & Wesson .40 or .45 caliber pistol with chrome slide to a subject they only knew as "J Bay [REDACTED]

told investigators that the victim had been communicating on his cellular telephone with “J Bay” via Snapchat regarding the circumstances of this deal.

██████████ advised that after arriving at the apartment complex Lampton parked the vehicle and messaged the subject they were supposed to meet via SnapChat to tell him they had arrived. ██████████ advised that they were contacted in the parking lot by a black male 20-25 years of age, about 6’ tall and between 125-150 lbs. with small black dreads wearing “nerdy style” glasses with “big lens” that were not sunglasses and wearing a red hooded sweatshirt with a “graphic design” on the front of it.

██████████ advised that Lampton questioned the subject on whether or not he wanted to do the transaction at the minivan or at another location. ██████████ advised that the subject wanted Lampton to go with him to another location for the transaction. ██████████ stated that the subject refused to allow him to accompany Lampton during the transaction therefore he remained inside the minivan. ██████████ stated that Lampton and the subject walked towards a set of apartment buildings that were behind them. He stated that within 30 seconds of Lampton leaving with the subject, he heard three quick gunshots and saw Lampton running towards the minivan.

██████████ stated that Lampton yelled for him and then collapsed on the ground along the driver’s side of the minivan. ██████████ stated that he immediately got out of the minivan to check on Lampton. He noted that Lampton was unresponsive and had blood on his stomach. Atkinson stated that he got back in the minivan and grabbed Lampton’s cell phone to call 911 for help.

One of the subjects inside 518 Sundown Drive matched the description of the subject observed on the video shooting the victim. That subject was identified as Jason A. Belshe Jr., B/M, 03-23-02. ██████████ was shown a photo line-up consisting of 6 subjects including Belshe Jr. After viewing the lineup ██████████ identified the photo of Belshe Jr. as being the subject that contacted the victim in the parking lot and walked with him between the 400 and 500 buildings before the shots were heard.

On 4-3-20 at approximately 1716 hours, Detectives executed a search warrant on 518 Sundown Drive. During the search of the residence Detectives located a red hooded sweatshirt and a pair of red Nike shoes in the southwest bedroom. The clothing matched the description of clothing given by witnesses that the suspect was wearing as well as what was seen in the surveillance video.

Additionally in a hall closet right off of that bedroom Detectives located three firearms, an unloaded Taurus .22 caliber with serial #Z060830, a Smith and Wesson SD9VE with serial #HFV2296 which was loaded with 14 rounds in the 16 capacity magazine and one round in the chamber and a Diamondback DB9 with serial #Y10038 loaded with 6 rounds in the 6 capacity magazine and 1 in the chamber.

On 4-3-20 at approximately 2053 hours, Detective Cook and Detective Burris conducted an interview with Belshe Jr. Prior to the interview taking place Belshe Jr. was read his Miranda Rights. Belshe Jr. did advise that he understood his rights and signed the Warning of Rights form.

During the interview Belshe Jr. admitted to meeting with the victim and advised that the victim had texted him on SnapChat trying to buy or “take” a gun. Belshe advised that he and the victim met and that as they were walking between the buildings the victim tried to “up on him” and take Belshe Jr.’s gun. Belshe Jr. advised that the victim had tried to pull a gun on him so Belshe Jr. fired 2-3 rounds at the victim as Belshe Jr. was running away.

Belshe Jr. advised that he ran back to the apartment, 518 Sundown Drive, and hid three guns in the hallway closet to include the victim's gun which was a .22 caliber which Belshe Jr. claimed to have picked up after the victim dropped it. Belshe Jr. described the other two firearms as a Smith and Wesson and a Diamondback. Belshe Jr. also advised that he had thrown the red "hoodie" and red shoes that he was wearing in the back bedroom of the apartment.

Belshe Jr. did advise that the victim was wanting to buy the Smith and Wesson from him but that he had shot the victim with the Diamondback. Belshe Jr. advised that the victim had wanted to give him money and "weed" for the gun but that Belshe Jr. had just wanted the money. Belshe Jr. was asked why he didn't call the Police after the shooting and he advised that he didn't because he is 18 years old and had a gun and was already on probation for "weed".

Detective Fries and Detective Winborn attended the autopsy on the victim which was performed by Doctor Ransom Ellis at the Jackson County Medical Examiner's Office. Detectives advised that the victim had two entrance wounds to the back and had \$400 cash on their person.

Detective Steve Cook

/s/Detective Steve Cook-879

Print Name

Signature