

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

POLICE NO. :	20-002697
PROSECUTOR NO. :	095459146
OCN:	

[illegible]

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 May 17, 2020, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Jason Juszcyk caused the death of Jason Juszcyk 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 May 17, 2020, in the County of Jackson, State of

State vs. Camryn Wilkins

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 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/ Michael J. Hunt

Michael J. Hunt (#34818)
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WITNESSES:

1. DEP Joshua Cox, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703

State vs. Camryn Wilkins

- 2. [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
- [REDACTED]

STATEMENT OF PROBABLE CAUSE**1 of 2****DATE: 5/18/2020****JCSO CASE NO.: 459146 Camryn Wilkins_PC Statement**

I, Detective Joshua Cox, of the Jackson County, Missouri Sheriff's Office, 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 05-17-2020, 8301 E Truman Rd, Blue Summit, MO 64126, which is inside the boundaries of Jackson County, Missouri, Wilkins, Camryn A W/M 06/08/2002, [REDACTED] last known address, 1432 S Ralston Ave, Independence, MO 64052, committed one or more criminal offense(s).
2. The facts supporting this belief are as follows:

On 05/17/2020, at 0202 hrs, deputies in the area of Truman Mart gas station, located at 8301 E Truman Rd, Blue Summit, MO 64126, overheard several gunshots coming from the direction of the establishment and responded to the area.

Upon arrival, Deputy Love located a white male later identified as Juszczuk, Jason W/M 08/17/1983 suffering from multiple gunshot wounds. Jason Juszczuk was transported to North Kansas City Hospital where he later died from his injuries. Kansas City Police Crime lab was called to the scene and located five (5) spent .357 cal shell casings on the ground along with one (1) live .357 round.

While on scene, a witness identified as [REDACTED] W/M 12/05/1975 advised that he had witnessed the shooting and the altercation leading up to the shooting. [REDACTED] advised that he had observed Jason Juszczuk involved in a verbal disturbance with two subjects later identified as [REDACTED] B/M 12/15/2000 and Wilkins, Camryn W/M 06/08/2002. [REDACTED] advised that he heard Jason Juszczuk say during the argument, "That's my niece. Audrey, get home." [REDACTED] stated that he heard Juszczuk say "I'll whoop your ass" and go after Camryn Wilkins. [REDACTED] further advised that Camryn Wilkins pulled a pistol, fired 5 shots, which caused Jason Juszczuk to fall to the ground.

Upon arrival to the scene, Deputy Breault made contact with [REDACTED] B/M 06/26/1948 who advised he was a witness to the shooting. [REDACTED] stated that he was sitting in his car on the northwest corner of the building when he observed four parties "hanging out" in front of the business. [REDACTED] described the parties as [REDACTED], Camryn Wilkins, a white female wearing a green sweat shirt, later identified as [REDACTED] W/F 10/18/2002, and another female party later identified as [REDACTED] N W/F 11/09/1999.

[REDACTED] stated that Jason Juszczuk came out of the business and began to tell the four previously mentioned parties that they needed to "get out of there" and go home. [REDACTED] stated that Camryn Wilkins began arguing with Jason Juszczuk at which time, Jason Juszczuk placed his hands around Camryn's neck and push him up against the building's exterior north wall. [REDACTED] informed Deputy Breault that the remaining three parties then separated Jason Juszczuk and Camryn Wilkins at which time, Camryn Wilkins produced a firearm and fired what [REDACTED] believed to be 5 times. [REDACTED] stated at that time he observed Jason Juszczuk fall to the ground, and overheard [REDACTED] yelling "why did you shoot him?" [REDACTED] stated that he observed all four parties left on foot but was unable to provide a direction of travel.

On 0300 hrs, Detective Cox responded to the Truman Mart gas station and obtained video surveillance of the altercation for review. Upon review of the video Detective Cox was about to observe multiple angles of the altercation and events leading up to the event. During the physical altercation, Jason Juszczuk is observed

STATEMENT OF PROBABLE CAUSE

2 of 2

DATE: 5/18/2020

JCSO CASE NO.: 459146 Camryn Wilkins_PC Statement

grabbing Camryn Wilkins by the neck and pushing him against the wall of the gas station. While being pushed back, Camryn Wilkins produces a handgun from his right jacket pocket.

██████████ is observed getting in between Jason Juszcyk and Camryn Wilkins and breaking up the physical altercation by pushing Camryn Wilkins away from Jason Juszcyk. As Camryn Wilkins is pushed away, he is observed on camera racking the slide of the weapon before discharging a single round toward the feet of Jason Juszcyk. Jason Juszcyk then took a step toward Camryn Wilkins, who then fired an additional 5 rounds, striking Jason Juszcyk multiple times in the torso and hand. Camryn Wilkins, ██████████, ██████████ and ██████████ are observed then fleeing the scene in a southbound direction on Marsh Ave.

While attempting to identify suspects in this case, Detective Cox released still frame images of the altercation to the media. Detective Cox was contacted via phone by ██████████ W/F 10/19/1987 who identified herself as the step mother of ██████████. ██████████ identified ██████████ and Camryn Wilkins from the pictures released to the media. ██████████ stated that her husband was “best friends” with Jason Juszcyk. ██████████ further advised that she spoke with Camryn Wilkins on the phone in which he fully confessed to the shooting and advised he was going to turn himself in.

Detective Hager responded to the Jackson County Medical examiner’s office to witness the autopsy of Jason Juszcyk. Detective Hager was provided a Preliminary Anatomic Diagnosis which listed the cause of death as multiple gunshot wounds and the manner of death as homicide.

/S/ Det. Joshua Cox 99/0426

Detective Joshua Cox
Jackson County, MO Sheriff’s Office