

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

POLICE NO. :	KC20035579
PROSECUTOR NO. :	095459351
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DAMON JOHNSON)	
8224 Holmes Rd.)	CASE NO. 2016-CR
Kansas City, MO 64131)	DIVISION
DOB: 08/20/1997)	
Race/Sex: B/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 May 31, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Anthony Ford Jr. caused the death of Anthony Ford Jr. 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 571.015.1, RSMo, in that on or about May 31, 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

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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/ Paul M. Conklin III
Paul M. Conklin III (#66958)
Assistant Prosecuting Attorney
415 E. 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3824
PTConklin@jacksongov.org

WITNESSES:

1. [REDACTED]
2. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
3. Anthony Ford Jr., Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. [REDACTED]
5. [REDACTED]
6. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
7. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
8. DET James H. Price, 1125 Locust, Kansas City, MO 64106

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9. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
10. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
11. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
12. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06-01-2020

CRN: 20-035579

I, Detective Bonita Cannon, #4585, Kansas City Missouri Police Department
(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 05-31-2020, at 8800 Crystal Lane #301 in
(Date) (Address)

Kansas City, Jackson Missouri Damon Johnson
(County) (Name of Offender(s))

DOB: 08-20-97 [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 05-31-2020 at approximately 1857 hours officers of the Kansas City Missouri Police Department were dispatched to 8800 Crystal Lane, Apartment #301, on a reported shooting.

Upon their arrival a male was located inside of the apartment. KCFD/EMS responded and declared the male deceased.

His death was ruled a homicide by the Jackson County Medical Examiner's Office.

Witness #1 ([REDACTED]) stated his son (victim) had just returned home and was walking towards the bathroom. As he did so, he uttered to the suspect (Johnson), "You still here." Witness #1 ([REDACTED]) stated he then heard the victim and suspect arguing and then fighting (or what he believed to be the victim and suspect engaged in a physical confrontation). Witness #1 ([REDACTED]) stated he did not see the physical altercation, however when he heard two gunshots he ran towards the victim, as the suspect is running past him and out of the apartment. Witness #1 ([REDACTED]) stated the suspect is Damon Johnson, his nephew. Witness #1 ([REDACTED]) was shown a single photograph of Damon Johnson (B/M 08-20-1997) to which he positively identified as his nephew.

Witness #2 ([REDACTED]) stated the victim (her best friend) was planning to move out of the address he shared with his father witness #1 ([REDACTED]). She stated they had left the address and returned for him to get his belongings. As the victim walked ahead of her to his bedroom, the suspect exited witness #1's bedroom walking in the direction of the victim. Witness #2 ([REDACTED]) stated she did hear any words or conversation before the suspect shot the victim twice. She further stated the suspect then left address. Witness #2 was unable to identify the suspect.

Witness #3 ([REDACTED]) stated he and the suspect along with a third male [REDACTED], were playing basketball. While doing so witness #1 ([REDACTED]) called Johnson and asked that they come over. All three of them went to the address, however [REDACTED] stayed in the vehicle. Witness #3 ([REDACTED]) stated they went into the apartment and listened to witness #1 ([REDACTED]) complain about the victim. He further stated witness #1 ([REDACTED]) told them he was "kicking" the victim out. Witness #3 ([REDACTED]) was also shown a photograph of Damon Johnson, to which he positively identified as shooting the victim.

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Witness #3 (████) stated Johnson went to the bathroom as the victim was pulling into the parking lot. He further stated the victim entered the residence and was walking towards his bedroom, as Johnson was exiting the bathroom. Witness #3 (████) stated the victim stood up straight and swung his fist at Johnson. He further stated Johnson ducked and then shot the victim twice. Witness #3 (████) stated he left the apartment after Johnson. He stated he was dropped off at home. He further stated he has not spoken to Johnson since the shooting.

On 06-01-2020 at approximately 1500 hours Johnson responded to Police Headquarters, 1125 Locust with his attorney. Johnson's attorney stated he would not be providing a statement.

Printed Name Det. Bonita Cannon, #4585 Signature _____

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

Judge

Circuit Court of _____ County, State of Missouri.