

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

POLICE NO. :	KC20028787
PROSECUTOR NO. :	095459445
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
RAYMOND J CAGE)	
8612 Euclid Avenue, #78)	CASE NO. 2016-CR
Kansas City, MO 64138)	DIVISION
DOB: 10/05/1988)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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 May 2, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Frederick Tolbert, caused the death of Frederick Tolbert 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 2, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count One, 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.

Count III. 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 May 2, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Terence Rodgers, caused the death of Terence Rodgers 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 IV. 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 2, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count Three, 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.

Count V. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about May 2, 2020, in the County of Jackson, State of Missouri, the defendant shot at the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of J.H. (DOB:

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10/28/2003), and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on J.H (DOB: 10/28/2003).

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. 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 VI. 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 2, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count Five, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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.

Count VII. Assault 1st Degree Or Attempt (565.050-002Y19791304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class B Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about May 2, 2020, in the County of Jackson, State of Missouri, the defendant shot at the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of Jamon Hill, and was done for the purpose of committing such assault.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count VIII. 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 2, 2020, in the County of Jackson, State

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of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count Seven, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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 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/ Jordan R. Bergus
Jordan R. Bergus (#64729)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
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jbergus@jacksongov.org

WITNESSES:

1. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. [REDACTED]
6. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
9. [REDACTED]
10. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
11. Terence Rodgers, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
12. DET Bradley N Thomas, 1125 Locust, Kansas City, MO 64106

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13. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

14. Frederick Tolbert, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO
64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/05/2020

CRN: KC20028787

I, Detective Hobart Price #5254
(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 05/02/2020, at 2338 Van Brunt Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Raymond J. Cage
(County) (Name of Offender(s))

black, male, DOB: 10/05/1988 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 05/02/2020 at 0715 hours Officers of the Kansas City Missouri Police Department responded to 2338 Van Brunt Blvd, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival Officers located three shooting victims. Victim #1 and Victim #2 died as a result of the shooting. The deaths were later ruled to be a Homicide by the Jackson County Medical Examiners Office.

Witness #1 was contacted who stated about an hour prior to the homicide, he heard an argument outside between victim #1 and an unknown male over money and pills. Witness #1 stated Victim #1 lived in his house (2338 Van Brunt) but Witness #1 did not know his last name. Witness #1 stated he heard the unknown male say, "I want my money" and "You think I'm playing, I'll be back".

Witness #1 stated approximately an hour later he heard a knock on the door and asked his nephew to get the door. Witness #1 stated after the front door was opened, he heard an unknown male say, "You thought I was playing" and then what sounded like a shotgun being racked followed by 4-5 loud gunshots. Witness #1 stated when he heard the gunshots he played dead but knew someone ran through the room he was in and then outside.

Victim #3 was contacted and stated he woke up to the sound of gunshots. He said he was in his bedroom with Witness #1. The victim stated witness #1 rolled onto the floor and he sat up in the bed. He was then shot in the shoulder and face. He said he saw a small silver handgun, but was unable to describe the suspect. He said the suspect appeared to be chasing someone else and he believed it was Victim #1.

Witness #2 was contacted and stated he was in the north bedroom and was going to sleep. Witness #2 did not hear anybody knock on the front door but looked up and saw his bedroom door falling in and caught the door with his foot. Witness #2 saw Ray Ray standing in the door. Witness #2 said, "Bro, what the fuck" Ray Ray took a step back and then pulled out a gun. Ray Ray walked towards the living room and disappeared out of sight and then Witness #2 heard gunshots. Witness #2 got up and ran to the back door. Witness #2 looked to his left then saw Victim #1 was shot. Victim #1 had blood coming out of his mouth, he couldn't speak and his eyes were big. Witness #2 stated he grabbed Victim #2 and was holding him up against the wall. Witness #2 stated he was trying to get the back door open and when he finally got the door open and started to run he looked back but Victim#1 couldn't run. Witness #2 stated he ran out and then Ray Ray started shooting at him. Witness #2 stated Ray Ray was standing on the side of the house approximately 6 feet away from him when he started shooting at him. Witness #1 stated he just ran to the Police Station.

Witness #2 stated Ray Ray was arguing earlier in the night with someone but he didn't know who he was arguing with. Ray Ray had left and come back after the argument. When Ray Ray came back the third time is when Ray Ray shot up the house.

Witness #2 stated he did not know Ray Ray's real name.

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I showed Witness #2 a photo lineup of six black males all similar in appearance. Witness #2 positively identified Raymond Cage B/M 10/05/1988 in the photo lineup as the person he knew as "Ray Ray". Witness #2 confirmed Raymond Cage was the person who entered the house at 2338 Van Brunt and was shooting at him.

Witness #2 described Raymond Cage's gun as being black and silver.

Surveillance video was obtained in the area of 2338 Van Brunt Bl.

At 07:08:54, a black male, wearing a blue hooded sweatshirt with white writing on the left sleeve, black pants and white tennis shoes, is observed walking eastbound on the south side of 23rd Street from the west. He is alone and does not appear to have exited a residence or vehicle when he is initially observed on the recording.

At 07:10:06, the male, turns and begins walking south on Van Brunt. At 07:10:36, he is observed knocking on the front door of 2338 Van Brunt. At 07:10:40, he is observed walking off the porch, south on Van Brunt on the sidewalk. At 07:10:51 hours, the front door of the residence is observed to open at which time the suspect is observed walking back to the front porch and entering the residence. The front door is observed to close at 07:11:07 hours.

At 07:11:49 hours, the front door is observed to open and the previously described suspect, exits the residence off of the front porch, and runs toward the grassy area on the south side of the residence. At 07:11:53, an unknown person is observed exiting the rear of the residence. The person appears to be wearing a red shirt and continues to run away from the residence west on 24th Street and then south where he disappears from the camera view.

At 07:11:56, an unknown person, wearing black clothing, is observed to also be at the rear of the residence. At 07:12:00, the suspect is observed to raise his arm consistent with that of someone who is firing a weapon and a muzzle flash is observed. The unknown person wearing the black clothing is observed between the two houses on the north side of the residence at 2338 Van Brunt and then is observed fleeing northbound on Van Brunt on the sidewalk at 07:12:10 hours.

While processing the crime scene, 9mm shell casings were found inside 2338 Van Brunt as well as in the yard where in the video the suspect, wearing the blue hooded sweatshirt, is observed raising his arm consistent with that of someone who is firing a weapon and a muzzle flash is observed.

The suspect is observed fleeing the scene on foot, west on 24th Street and then north on Denver Avenue. The suspect is then seen again on surveillance video walking northbound at 2208 Denver Ave after the murder.

Witness #2 was shown pictures from the surveillance video at 2208 Denver and confirmed the picture in the surveillance video is Raymond Cage.

Witness #3 stated she was at 2338 Van Brunt Bl and they were drinking and having a good time. Raymond Cage and another male were arguing outside. Witness #3 saw Raymond Cage had a gun on him tucked under his arm. Witness #3 stated Raymond's gun was pointed at her while they were sitting on the porch so she got up and moved because she did not want it to accidentally go off and shoot her. Witness #3 stated Raymond Cage got into an argument with the male and threw his gun onto the ground. Raymond stated, "I'll box and I'll shoot." Witness #3 described Raymond Cage's gun as black and silver.

I showed Witness #3 a single picture of Raymond Cage. Witness #3 confirmed this was the person she saw with the gun at 2338 Van Brunt Bl. Witness #3 stated this was the person she knew as "Ray Ray".

On 06/05/2020 Raymond Cage was arrested in St Louis Missouri by members of the US Marshals. Detectives from the Kansas City Missouri Police Department responded and interviewed Raymond Cage. Raymond was read his Miranda rights and spoke with Detectives. Raymond denied ever being at 2338 Van Brunt Blvd, Kansas City Missouri. Raymond advised he did not know the victims or witness #2. Upon further questioning Raymond requested an attorney and the interview was ended.

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Printed Name Detective Hobart Price #5254 Signature /S/ Hobart Price #5254

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

Judge

Circuit Court of _____ County, State of Missouri.