

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

<b>POLICE NO. :</b>	KC20043751
<b>PROSECUTOR NO. :</b>	095459784
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JUSTIN A ROGERS</b>	)	
<b>7540 Washington</b>	)	<b>CASE NO. 2016-CR</b>
<b>Kansas City, MO 64114</b>	)	<b>DIVISION</b>
<b>DOB: 10/08/1994</b>	)	
<b>Race/Sex: B/M</b>	)	
<b>████████████████████</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim**  
**(565.050-001Y19841310.0)**

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 July 2, 2020, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to ██████████ by shooting ██████████.

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.

**State vs. Justin A Rogers**

**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 July 2, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree as charged in Count I, all allegations of which are incorporated here 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 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class A Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 2, 2020, at Hardesty Avenue and Independence Avenue, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a city bus, and as a result of the above described conduct, [REDACTED] suffered injury or death.

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)**

**State vs. Justin A Rogers**

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 July 2, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon as charged in Count III, all allegations of which are incorporated hereby reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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/ P. Benjamin Cox*  
P. Benjamin Cox (#60757)  
Assistant Prosecuting Attorney  
415 E. 12th St., Fl 7M  
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BCox@jacksongov.org

**State vs. Justin A Rogers**

**WITNESSES:**

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. [REDACTED] [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET James H. Price, 1125 Locust, Kansas City, MO 64106
4. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
5. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
6. [REDACTED]  
[REDACTED]  
64106
8. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
9. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106
10. [REDACTED] City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 07-02-2020

CRN: 20-43751

I, Detective Ryan Taylor, #5585, KCPD Homicide Unit  
(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 07-02-2020, at Independence Avenue & Hardesty in  
(Date) (Address)

Kansas City, Jackson Missouri Justin A. Rogers  
(County) (Name of Offender(s))

B/M 10-08-1994 [redacted] committed one or more criminal offense(s).  
(Description of Identity)

- Aggravated Assault
- Armed Criminal Action
- Stealing

The facts supporting this belief are as follows:

On 07-02-2020 at approximately 10:38 hours, officers of the Kansas City Missouri Police Department responded to the area of Independence Avenue and Hardesty, Kanas City, Jackson County, Missouri in regard to shots fired and an assist the officer.

Upon arrival officers located three victims, a KCPD Officer [redacted], a KC-ATA bus driver [redacted] and a citizen on the ATA bus [redacted]. The suspect sustained gunshot wounds and was transported to a local hospital.

The KCPD officer ([redacted]) was injured in the exchange of gunfire and was transported to a local hospital with non-life threatening injuries. The KC-ATA bus driver sustained a gunshot wound to the shoulder and was transported to a local hospital with non-life threatening injuries.

Detectives contacted [redacted] the KC-ATA bus driver who stated was she operating ATA bus #193 westbound on Independence Avenue. She stated as she approached Independence Avenue, she observed an older black male (later determined to be victim [redacted] at the bus stop. She stopped the bus. She also observed a second black male (suspect), at the same location, standing over a white male who was lying on the ground. [redacted] stated she observed the suspect remove the male's wallet from his pocket. She stated victim [redacted] got onto the bus followed by the suspect.

[redacted] stated she called ATA dispatch to get an officer to respond using their code word. She stated when they arrived at Independence Avenue and Hardesty she stopped the bus when she observed an ATA Supervisor approaching. She stated the Supervisor got on the bus, asked what was going on, she pretended to be talking to him about an issue with the bus, so as not to get the attention of the suspect. She stated the supervisor got off, as the suspect approached her asking what was going on. She stated she told him she had an issue with the bus.

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She further stated he approached her at least three times asking questions and at one point asked to get off of the bus to smoke a cigarette.

█ stated the first officer arrived, and then a second officer arrived at which time she opened the rear side door to allow the officers onto the bus. She stated the suspect exited the bus at which time she heard the sound of gunfire. She stated she observed the officer on the ground behind a trashcan, trying to crawl away as the suspect was running towards and shooting at the officer. She stated the suspect stopped shooting at the officer █ and looked in her direction.

█ stated the suspect "looked as if he didn't know what to do next", however he starting shooting in her direction (at the ATA bus). She stated she got up to run and realized she had on her seatbelt. She stated as she was able to get up, she realized she was shot.

Detectives then contacted █ who stated that prior to the incident he was waiting at the ATA bus stop located at Independence Avenue and Wilson. █ observed that there were two unknown Hispanic males that appeared to be intoxicated and passed out or sleeping. One of the unknown males was sleeping on the bus bench then got up and stumbled and fell and hit his head and started bleeding. The male laid there for a minute and then got up. About 10 or 15 minutes later the suspect arrived at the bus stop, about 2 or 3 minutes before the bus arrived. The suspect asked █ "are they alright man?" █ told the suspect that they were just drunk and were ok. █ then turned his back to them and continued watching and waiting for the bus and observed it coming around the corner. When █ turned around he observed the suspect put a wallet into his pocket. █ added that a minute before that he observed the suspect shaking the guy on the ground (in attempt to rouse him) and asked if he was alright.

█ got on the bus as well as the suspect when it arrived. █ stated that it was only he, █ and the suspect on the bus. He observed the unknown male lying on the ground get up and start to get on the bus. The suspect screamed from the back of the bus "he can't get on the bus because he doesn't have a facemask on." The unknown male then turned around and went back on the bench. The bus then left the stop and drove towards Independence and Hardesty. The bus driver stopped at the light and started using the phone. Approximately 3 or 4 minutes later a supervisor pulls up, and the bus driver talked to him. The supervisor got off the bus and the bus driver closed the glass partition preventing the suspect from exiting the bus. The suspect then began to walk back and forth pacing, telling the bus driver that he wanted to exit the bus and smoke a cigarette. The bus driver told the suspect no, and that they would be leaving shortly. At the time █ observed a police car pull up and the officer (█) walk towards the front of the bus. The suspect walked from the rear of the bus to the front where the officer was beginning to board the bus. The suspect pulled a silver gun and shot the officer (█). █ stated that the officer was in full uniform, recognized him as a police officer, and stated that the officer did not have his weapon drawn. █ stated after he was shot, the officer fell and attempted to exit the bus. The suspect exited the bus and turned around and shot at the bus 6 or 7 times. During that gunfire, the bus driver was shot in the shoulder. █ stated he got on the floor and observed the suspect standing outside the bus and appeared confused about what to do.

Detectives contacted █ whose wallet was originally stolen by the suspect. █ stated he remembered being around the Phillips 66 at Independence and Wilson, and at the car wash at Independence and Lawndale. He was

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very intoxicated and passed out and when he woke up he noticed his black wallet missing from his left rear pocket, his cell phone (LG with black case) missing from his front right pocket, and his backpack missing, which he had set down. He stated he did not see who took his items.

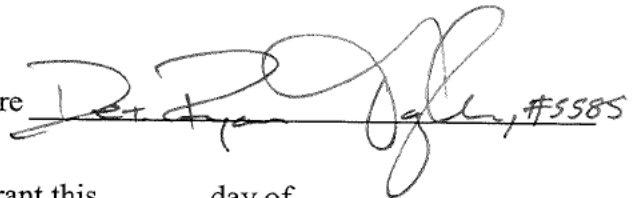
When asked if he remembered trying to get on a bus he stated he did not remember trying to get on a bus. When asked if the police were there when he woke up he stated he believed they were in the area and he then walked home.

Detectives reviewed the in-bus security camera footage. Upon review it showed that the suspect, [redacted] and [redacted] were the only individuals present in the bus. The suspect captured on video shooting at the officer [redacted], [redacted] and [redacted] was then observed to be shot by responding officers. The suspect was transported to the hospital and was fingerprinted by the Missouri State Highway Patrol. The Highway Patrol identified the suspect as Justin A. Rogers.

The injury sustained by the officer [redacted] was a gunshot wound to the upper shoulder. [redacted] sustained a gunshot wound to the shoulder.

Printed Name /s/ Det. Ryan Taylor, #5585

Signature



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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.