IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI \underline{AT}

POLICE NO).: KC20048929
PROSECUTOR NO	0.: 095460152
OC	N:
STATE OF MISSOURI,)
PL	LAINTIFF,)
VS.)
JONATHAN L BRADFORD)
4002 Tracy Ave.) CASE NO. 2016-CR
Kansas City, MO 64110) DIVISION
DOB: 02/08/1982)
Race/Sex: B/M)
)
DEF	TENDANT.)

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 July 22, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Lodillar R Styles caused the death of Lodillar R Styles 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 July 22, 2020, in the County of Jackson, State of

Missouri, the defendant [Insert one of the following. 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.

Count III. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20172902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the **class D felony of tampering in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 22, 2020, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile, a truck belonging to Lodillar R. Styles .

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count IV. Abandonment Of A Corpse (194.425-001Y20175599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 194.425, RSMo, committed the class E felony of abandonment of a corpse, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 22, 2020, in the County of

Jackson, State of Missouri, the defendant drug a corpse from a truck and put it in a public street, striking it with a motor vehicle as he drove away, and knowingly abandoned the corpse of Lodillar R. Styles at 40th and Tracy without properly reporting the location of the body to the proper law enforcement officials.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count V. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about July 22, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 9mm pistol, a firearm, and on July 27, 2012, the defendant was convicted of the felony of unlawful transport of firearms in federal court in the State Missouri. Additionally, in 1999, the defendant was convicted of the felonies of robbery and armed criminal action in the state courts of Jackson County, Missouri.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count VI. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about August 2, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 45 caliber Hi-Point model JHP, a firearm, and on July 12, 2012, the defendant was convicted of the felony of unlawful transport of firearms in federal court in the State Missouri. Additionally, in 1999, the defendant was convicted of the felonies of robbery and armed criminal action in the state courts of Jackson County, Missouri.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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/ Jennifer S Tatum
Jennifer S Tatum (#70789)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
(816) 881-3628
itatum@jacksongov.org

WITNESSES:

- 1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
- 2. Consider the Consecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 3. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
- 4. Constitution of the state of
- 5. Ee, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 6. DET James H. Price, 1125 Locust, Kansas City, MO 64106
- 7. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
- 8. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
- 9. Ee, 415 E 12th St, Floor 11, Kansas City, MO 64106

- 10. Lodillar R Styles, Prosecuting Atty. Office, 415 E 12th St, Floor 11, 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

64106

Date: _07-30-2020			CI	RN:	20-48929	
I, _Detective Ryan Taylor, #5585 KCPD) Homicide	Unit				
(Name and identify law enforcement officer,						
knowing that false statements on this form	m are punis	hable by la	w, state that the fa	acts c	ontained here	in are true.
I have probable cause to believe that on	07-22-202	0	, at 40^{th} and $Transports$	acy A	venue	in
	(Da	ite)			(ddress)	
Kansas City, Jackson	Missouri	Jonathan	Bradford			
(County)	-		(Name of	Offen	der(s))	
B/M 02-08-1982 (Description of Identity)		_ committed one	or m	ore criminal of	ffense(s).
 Homicide Armed Criminal Action Auto Theft Felon in Possession of a Firearm 						
The facts supporting this belief are as follows:	lows:					
On 07-22-2020 at approximately 1854 hou dispatched to 40 th and Tracy on a reported of the street deceased from apparent gunsh the death a homicide.	shooting. U	Jpon arriva	al officers located	the v	ictim lying in	the middle
Officers determined that the victim, the su the intersection of 40^{th} and Tracy.	spect and a	female wi	tness (LM) were in	n a la	rge blue picku	p truck at
The victim's truck was located at 40 th and floor board during initial processing. The t processing.	Highland. A	A single FO	C 9mm was recove KCPD vehicle pr	ered o	out of the back sing facility fo	passenger r further
stated that the victim contacted her and was alone and driving his new blue truck. arrived the suspect was already at the victi her to get a tattoo. She noticed the suspect stated that the suspect began to act weird. passenger side on the victim's truck. Upon approaching 40 th and Tracy the victiout of the vehicle, however the doors were the suspect not to pull on the door handles	d wanted to The victim im's apartm was smokin stated a stated the vic im pulled ov e locked. The	drove her hendered her. Hendered her her hendered her her hendered her hendered her her hendered her	te picked her up froack to his apartmated at some point from a glass bong the leaving, the suspriving and she wat off the suspect. Tooked in the direct	the surion o	stated when wictim was going started sweating got into the reache front passers aspect attempted for the suspect at	en they ing to take ag. She ar ager seat. ed to get and asked

CRN 20-48929

window down and open the door from the outside. It stated the suspect uttered "ok" and then shot the victim in the back of his head or face. She stated the suspect reached over and forced the victim's foot on the gas causing the truck to strike a white van.
Detectives contacted who stated that she and her roommate were inside their house at about 1900 hours. They heard what sounded like vehicles colliding outside their house and went outside to see what the noise was She observed a blue pickup truck had collided with the neighbor's parked van. There was a bald black male outside the truck who stated, "Look what she did, look what she did!" There was a black female who ran up to and asked to be let into the house. The refused and the female ran to the side of the house and attempted to gain entry through a side door. We went inside to retrieve a taser. When went back outside she observed a bald black male attempting to pull another male (the victim) out of the truck via the front passenger door. The victim was thrown onto the street by the bald male. The somewhat is roommate asked about a pulse and the bald male replied, "I don't know, what's what I am seeing." The bald male got into the truck and started trying to get it off the van, as the vehicles were stuck together. The bald male got into the truck and then had to get out of the way of the truck. The suspect driving the truck then pinned the roommate between the tires of the truck and his own vehicle which was parked on the street. Sustained injuries from being pinned between the car and the truck. The truck made a right and was last observed by traveling down 40 th Street. When first observed the truck, the bald male was in the front passenger's seat. She did not see the woman get out of the truck.
Detectives contacted who stated at around 1900 he and were in the house watching TV when they heard a loud crash like a vehicular accident happening. Walked to a window and looked outside and observed a big blue truck wrecked into the neighbor's van out front. Hescribed the truck as a big blue truck that was lifted with aftermarket tires and four doors stated they went outside to see what happened. Stated that there was a male inside the truck that stated, "Look at what she did." observed a black female exit the back right of the truck and come up to the porch and asked to come inside. The female went to the back side of the house so went back inside to retrieve a firearm. Went back to the front to move his vehicle and when he came back out. Subserved the male open the passenger door of the truck and dragging the victim out of the passenger seat covered in blood. Walked up to help and walked up to the passenger door but didn't get a chance to help because the male threw him on the ground and started flipping him around. Suked the male if he had a pulse, to which the male said, "That's what I'm trying to find out." Shortly after that, the male got back into the truck. Fearing that the male was attempting to flee, so on the phone and called the police. The male was revving the truck and attempting to leave. The truck managed to back up and moved forward. The male was revving the truck and attempting to leave. The truck managed to back up and moved forward. The feared that the truck would run over the victim, was grabbed the victim's arm and attempted to drag him. After dragging the victim about a foot the truck moved forward, running over the victim's body and then pinning between the truck and his vehicle. The truck then left eastbound on 40th street.
Detectives contacted who stated that he had left a building on 31 st Street and was driving southbound on Paseo Boulevard when he observed a blue pickup truck driving erratically across Paseo. stated that he observed the truck pull off into a field, so he turned his truck around and stopped to observe. stated that he observed a black male, in his late 20's or 30's, wearing a white T-shirt and khaki pants. described the male as bald, stocky and sweating profusely. He observed the male exit the driver's seat and retrieved two duffle bags from the truck.

CRN	20-48929
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BRADFORD, Johnathan was at the victim's residence on the day of the homicide. The victim told BRADFORD "Come on man, I'm gonna take you home. I got somewhere to go." The family stated that BRADFORD, a female and the victim got into the victim's truck and then left, heading to 4002 Tracy Avenue. Detectives then re-contacted for the purpose of showing her a photo lineup. was presented six individual photographs of black males, all similar in appearance, to include the suspect, BRADFORD. She viewed each photo; she immediately eliminated four, while focusing on a filler photo and BRADFORD. After continuing to look, Matthews pointed to BRADFORD's photo as the suspect.

Detectives then re-contacted and to show a photo lineup. and were unable to identify BRADFORD as the suspect.

Detectives processed the victim's truck at the KCPD vehicle processing facility. It was observed that the child locks on the rear passenger doors were activated. 2 additional FC 9mm Lugar shell casings were recovered from the back right floor board and a box sitting on the rear passenger seat.

On 08-01-2020 at approximately 2330 hours, **BRADFORD** was arrested in the area of Cypress Avenue and Tower Road in regard to the homicide. Officers located **BRADFORD** sitting in the front passenger seat of a blue Ford Taurus. When officers started to approach the vehicle **BRADFORD** exited and ran northbound on Cypress Avenue. **BRADFORD** was taken into custody after a brief foot chase. After officers returned to the vehicle that **BRADFORD** fled from they observed a black handgun sitting in plain view on the passenger seat where **BRADFORD** was sitting. When recovered, the pistol was identified as a .45 caliber Hi-Point model JHP, a weapon and caliber not used in the victim's homicide.

BRADFORD was transported to 1125 Locust Street, Police Headquarters.

Detectives contacted BRADFORD at 2359 hours in an interview room in the Homicide Unit. BRADFORD was advised of his Miranda warning and waiver to which BRADFORD agreed to speak with detectives. BRADFORD stated that on the day of the homicide he was at the victims' apartment. BRADFORD stated that the victim had female with him (at the apartment as well. BRADFORD stated he was outside smoking when the victim asked, "ready homie?" BRADFORD stated the victim was going to drop him off at the house he was staying at off 40th and Tracy. BRADFORD indicated that he had his bags of clothing in the truck in the back seat and had been there all day. BRADFORD stated that when they all left to take him home the victim was sitting in the front passenger seat and he was sitting in the back seat next to all of his bags of clothing. asked the victim if he would pick up her little brother, to which the victim stated that he didn't mind. BRADFORD stated they turned on an unknown block and picked up the unknown little brother. BRADFORD indicated that the unknown male couldn't get in the truck from the left side due to all of his belongings taking up space. BRADFORD had to push his bags of clothing over and put the tub of belongings on his lap. The unknown male then sat next to him in the back seat. When they pulled up to his ex's house, "all chaos broke out." BRADFORD stated that he wasn't sure who shot or where the shots came from, he was just trying to get out of the door. The victim never had the truck in park so it went forward and hit the van and jarred everyone. **BRADFORD** stated that then left the truck.

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Detectives then confronted **BRADFORD** about witness statements indicating that there was not a 4th person observed exiting the truck after the victim was removed and I fled. **BRADFORD** stated that the unknown individual was still in the truck.

Detectives told **BRADFORD** that witnesses told police that after the truck wrecked out into the van, the truck and ran to a neighbor's house then **BRADFORD** exited the truck pulled the victim out of the truck and then backed the truck up, ran over the victim and then fled the scene. **BRADFORD** said that was correct, but the 4th person was still in the back seat. **BRADFORD** stated that the individual never got a chance to get out of the truck. **BRADFORD** then showed detectives scratches all over his body and indicated that there was a physical struggle. (It should be noted that the marks and scratches on BRADFORD appeared to be old scars) After the struggle **BRADFORD** got out of the truck and run around to the driver's side of the truck (with this 4th person still in the back seat). **BRADFORD** tried to push the victim over the center console and get out of the area to get him help. **BRADFORD** struggled to get the victim over to the passenger seat, so he ran to the passenger side and opened up the door. The victim fell out and there was blood everywhere. **BRADFORD** stated that one of the witnesses came over and was saying, "call the police" so he (**BRADFORD**) jumped into the truck and left the scene. **BRADFORD** indicated that running over the victim was not intentional.

When detectives tried to ask **BRADFORD** to clarify what happened when the truck finally came to rest **BRADFORD** would not explain.

BRADFORD was then presented with a Facebook message that was obtained via search warrant for his Facebook Account. In this message **BRADFORD** was speaking with his sister and stated:

"U know what sis I was just thinking everybody keep saying I did this shit than fuck it yes I did do it tell them I did it because the nigga didn't want to keep his hands off my daughter so he's dead didn't nobody have shit to say when he kept putting his hand on my daughter so I handle it and don't give a fuck how nobody feels my daughter is safe any father would've done what I did so id blaming me helps everyone sleep at night than yes I did it y can tell everybody what I said if mutha fucka want to be mad at me for protecting me daughter than so be Johnathan a killer snake whatever ill take that but my daughter aint got to worry about him putting his hands on her no more so now I can sleep at night not having to worry about my daughter."

BRADFORD downplayed the message and stated that he was going to take responsibility because everyone is already saying that he committed the homicide. **BRADFORD** still maintained that he did not shoot and kill the victim.

BRADFORD admitted that he was sitting in the passenger seat of the Ford Taurus before he was arrested. BRADFORD admitted the gun was in the front passenger seat and that he was alone in the vehicle.

BRADFORD is a convicted felon and was convicted with a weapon offense (unlawful transport of firearms) on 07-12-2012. **BRADFORD** was charged with Robbery 1st Degree and Armed Criminal Action on 05-24-1999.

	CRN <u>20-48929</u>
I believe the defendant poses a danger to the communit he has been convicted of and his propensity for violence	y or to any other person because of past violent felonies e.
Printed NameDet. Ryan Taylor, #5585 The Court finds probable cause and directs the issuance	Signature day of
Ju	dge
Circuit Court of	County, State of Missouri.