

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

POLICE NO. :	KC19051077
PROSECUTOR NO. :	095458378
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JONATHAN D CAMPBELL)	
3110 Agnes Ave.)	CASE NO. 2016-CR
Kansas City, MO 64128)	DIVISION
DOB: 02/25/1991)	
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 July 9, 2019, in the County of Jackson, State of Missouri, the defendant, alone or purposely in concert with another, knowingly or with the purpose of causing serious physical injury to Corey Richardson caused the death of Corey Richardson 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.

Defendant is given further notice that should the State submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Corey Richardson as a result of the perpetration of the felony of attempted distribution of a controlled substance.

State vs. Jonathan D Campbell

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 9, 2019, 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 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.

State vs. Jonathan D Campbell

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jordan L. Logan
Jordan L. Logan (#63975)
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WITNESSES:

1. PO Anthony J. Helfrich, 1125 Locust Street, Kansas City, MO 64106
2. Corey Richardson, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Angelina M. Sanchez, 1125 Locust Street, Kansas City, MO 64106
4. 
5. DET Timothy Fitzgerald, 1125 Locust Street, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08-03-2020

CRN: KC19051077

I, Detective Angelina Sanchez #5708 of the 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 07-09-2019, at 57th and McGee Street in
(Date) (Address)

Kansas City, Jackson Missouri Jonathan D. Campbell
(County) (Name of Offender(s))

R/S: B/M DOB: 02-25-1991 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07-09-2019 at 0021 hours, officers with the Kansas City Missouri Police Department were dispatched to the area of 57th and Brookside on a non-responsive party. Upon arrival, officers located the victim in the park with multiple gunshot wounds; their location was updated to 57th and McGee. Medical personnel responded to the scene and pronounced the victim deceased.

The crime scene was processed and multiple items of evidence were recovered including the victim's cell phone, a red lighter with a rubber attachment, eight 10mm shell casings and two live 12 gauge shotgun rounds. Seven of the .10mm shell casings were located in the grass which spanned the distance between the victim and a large tree to the northeast of the victim. One shell casing was on the sidewalk just north of the victim. The two live 12 gauge shotgun rounds were located in the grass under the aforementioned tree, the cell phone was in the grass near the victim's feet, and the lighter was found to the east near the curb of the apartment complex's parking lot entrance. The only property found on the victim were his clothing and a single key which was attached to a lanyard around his neck. The pants pocket which was most accessible from the position the victim was laying was turned out and he was not wearing shoes. The bottom of his white socks appeared to be grass stained.

Motion activated surveillance obtained from the crime scene located at 57th and McGee revealed the suspect vehicle; a dark, crossover type SUV, arriving at the scene of the homicide at approximately 0000 hours with its lights off. The vehicle, traveling west on 57th Street, stops and backs up into the drive which separates the park and the nearby apartments. When motion is reactivated, the suspect vehicle can be seen fleeing at a high rate of speed at approximately 0002 hours with its lights still off. However, prior to fleeing the scene, an unknown individual can be seen quickly entering the front passenger side of the suspect vehicle, nearest the park side where the victim was later found deceased.

PROBABLE CAUSE STATEMENT FORM

CRN KC19051077

Statements from an identified witness are consistent with this surveillance. The witness, a resident in the neighborhood, told detectives that she heard two distinct adult male voices, sounding as if they were “dressing somebody down”, followed by what she thought were firecrackers, and she heard a car door close. She then went to her window and observed somebody get into the passenger side of a dark colored SUV and drive off. The witness believed the vehicle travelled west on 57th St, though surveillance suggests the vehicle travelled east as it sped away.

During the investigation, it was determined that the victim sold drugs in the time period leading up to his death. Those close to the victim stated that he always carried a backpack containing his money and drugs. Facebook pictures of the victim confirmed he often wore a backpack and show him wearing slider type sandals with socks, as well as a lighter and key on a lanyard around his neck. Detectives were also informed that the victim did not own a vehicle; therefore, consistently relied on others for rides.

The victim’s phone records were extracted from the cell phone recovered at the scene and cell phone records were obtained from his cell phone provider for comparison and analysis. After review of the gathered records, the victim sent text messages related to the purchase narcotics during the evening of 07-08-2019. In a particular text from the victim to a dealer at 1959 hours, he requests 200 Xanax and the dealer responds that he is on his way.

Review of the phone records also reveal the last text and call exchanges prior to the victim’s death were found to be from “J Stackks” an individual later identified as **Jonathan D. Campbell B/M 02-25-1991. Campbell** and the victim’s phone exchanges took place as follows:

- **Campbell**: text message 07-08-2019 at 22:42:52 hours - “Lil bro is u ready or what I got some plays 4 u in the city”
- Victim: text message on 07-08-2019 at 22:43:12 hours – “What’s the plate” This message status is “Unsent”
- Victim: text message on 07-08-2019 at 22:43:17 hours – “Plays”
- **Campbell**: text message on 07-08-2019 at 22:44:35 hours – “Meet me at my apt”
- Victim: text message on 07-08-2019 at 22:45:26 hours – “What’s the play”
- Incoming call from **Campbell** on 07-08-2019 at 22:41:33 hours. This is a Missed call.
- Outgoing call to **Campbell** on 07-08-2019 at 22:46:00 hours lasting one second.
- Outgoing call to **Campbell** on 07-08-2019 at 22:46:12 hours lasting one minute and 13 seconds
- Incoming call from **Campbell** on 07-08-2019 at 22:51:12 hours lasting two minutes and eight seconds.

An additional text message was sent to the victim from **Campbell** at 0039 hours on 07-09-2019 (approximately 39 minutes after the homicide). The message read as follows: “Bro im in bed u gotta pay another mf 2 get u and ur lil black ass homie a snake watch ur shit I love u bm tripping.”

On 09-20-2019, detectives contacted **Campbell** by phone and a statement surrounding the events of that night was provided. **Campbell** advised detectives that he was currently out of state; however, on 07-08-2019, he was in Kansas City and spoke to the victim over the phone and asked that he come over to his apartment, which is in the same apartment complex north of the river as the victim’s (Crooked Creek). The victim advised **Campbell** that he was already on his way down to the city, so **Campbell** left his apartment and met the victim near 47th

PROBABLE CAUSE STATEMENT FORM

CRN KC19051077

and Troost in Kansas City, Missouri. **Campbell** advised that he did not send the victim to the city for drug deals, but rather met him there himself and bought \$50 worth of marijuana for his own personal use and to sell. **Campbell** stated the victim was in a silver car with a male and two females; however, he was unable to provide any names other than referring to the male as "lil dude." **Campbell** stated the encounter was brief and he left and went to his cousins near 59th and Jackson in Kansas City, Missouri.

Campbell advised detectives that his cautionary text message to the victim at 0039 on 07-09-2019 was referring to the male "lil dude" who **Campbell** stated he had observed the victim with at 47th and Troost. **Campbell** also stated the victim contacted him from a number he did not recognize asking him for a ride. **Campbell** stated the call from the unknown number took place a short time after meeting up with the victim. **Campbell's** phone records were obtained and no call corroborating this statement has been identified. In addition, preliminary mapping of **Campbell's** phone does not place him in the area of 47th and Troost or 59th and Jackson as he had indicated.

During the phone conversation with **Campbell**, he provided detectives with a false last name and birthdate. **Campbell** could not be reached after the conversation took place as his phone number was no longer working.

After further review of **Campbell's** phone records, the phone data revealed only one number to and from **Campbell's** phone between the final phone call to the victim (2250 hours) and the time of the homicide (approximately midnight). This number can be seen on records via text and voice calls throughout the day on 07-08-2019; therefore, the individual is likely known to **Campbell**, which contradicts his statement that the victim called him from an unknown number. A total of six calls were made between **Campbell** and the aforementioned number from 2256 hours to 2352 hours, as well as one text message. This individual is believed to be a second suspect.

Preliminary mapping of **Campbell's** phone during this time reveals that **Campbell** travelled in a southern direction starting from an apartment complex north of the river in Kansas City, Clay County, Missouri where he and the victim both live, to the towers which cover the second suspect's residence, approximately one mile from the crime scene. From training and experience, detectives are aware that cell phones generally access their associated provider's cell towers that are geographically closest to the phone's location at the time of a given call or cell activity.

Preliminary mapping of the victim's cell phone records show that his phone was also in the area of the apartment complex north of the river at the time he and **Campbell** had communication at 2246 hours and 2251 hours as referenced in the above bullet points. This information suggests that the victim was still in the area of their apartment complex at the time of these phone calls and likely not on his way to the city as **Campbell** had indicated.

Investigation also revealed that **Campbell's** girlfriend drives a 2019 black Ford Escape, this vehicle is consistent with the suspect vehicle seen on surveillance at the crime scene around the time **Campbell's** phone is indicating he is in the area. The surveillance also suggests that at least two people other than the victim are present at the time of the homicide and that the victim likely arrived in the suspect vehicle. No other vehicles or people activate the motion cameras around this time, and the victim's body is left behind at the crime scene

PROBABLE CAUSE STATEMENT FORM

CRN KC19051077

when suspect vehicle flees. **Campbell's** phone does not appear to be active from 07-08-2019 at 2352 hours until 7-09-2018 0010 hours during the time of the homicide, and at 0010, the phone is located in the area of the second suspect's residence which is approximately one mile from the crime scene. Following this phone activity, as Campbell's records indicate he travels north away from the scene, Campbell has a phone call once again with the second suspect at 0017.

On 12-03-2019, **Campbell** was arrested on an unrelated offense and a swab of his DNA was obtained through a search warrant. With the evidence gathered thus far on the investigation relating to **Campbell**, a lab analysis of **Campbell's** DNA and a swab taken of two live 12 gauge shotgun rounds collected from the 57th and McGee scene, near the body of Corey Robinson, was requested for comparison. On 01-20-2020, A Kansas City Police Crime Laboratory report dated January 19, 2020 was received. The summary of the report states that "there is very strong support that **Jonathan Campbell** is a contributor to item 016.1C, swab of live rounds." The statistical value including **Campbell's** DNA on the shotgun rounds is 1 quintillion.

A search of **Campbell's** criminal history revealed him to be a convicted felon in the state of Missouri. In May of 2008, **Campbell** was sentenced to 12 years of confinement when found guilty of Kidnapping, two counts of Armed Criminal Action, and Robbery in the 1st Degree. He was released February 23, 2019; which was approximately five months prior to the homicide.

Campbell is currently in custody at Jackson County Jail; therefore, a statement was not obtained.

Printed Name Detective Angelina Sanchez 5708 Signature /s/ Det. Sanchez 5708

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

Judge

Circuit Court of _____ County, State of Missouri.