

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

<b>POLICE NO. :</b>	KC20051515
<b>PROSECUTOR NO. :</b>	095460371
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>THORNE A. MCKENDRICK</b>	)	
<b>6616 East 12th Ter</b>	)	<b>CASE NO. 2016-CR</b>
<b>Kansas City, MO 64126</b>	)	<b>DIVISION</b>
<b>DOB: 12/26/2000</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	
	)	<b>DEFENDANT.</b>

**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 August 1, 2020, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Michael W Brown, caused the death of Michael W Brown by shooting him and defendant is further given 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 Michael A. Brown as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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.

**State vs. Thorne A. McKendrick**

**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 August 1, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder 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 August 1, 2020, at 5612 East 12th Street, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at Michael W. Brown and as a result of the above described conduct, Michael W. Brown 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.

**State vs. Thorne A. McKendrick**

**Count IV. Armed Criminal Action (571.015-001Y19755212.0)**

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 August 1, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 3, all allegations of which are incorporated herein by 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.

**State vs. Thorne A. McKendrick**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Kristiane N. Bryant*  
Kristiane N. Bryant (#69524)  
Assistant Prosecuting Attorney  
415 E. 12th St., Floor 7M  
Kansas City, MO 64106  
(816) 881-3597  
KNBryant@jacksongov.org

**WITNESSES:**

1. Michael W Brown, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. DET Steven A. Cisneros, 1125 Locust, Kansas City, MO
3. DET Jonathan E. Cook, 1125 Locust, Kansas City, MO 64106
4. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
5. ██████████, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. DET Eric M. Krawchuk,
7. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
8. DET Robert A. Maser, 1125 Locust, Kansas City, MO 64106
9. DET Patrick J. McKenzie, 1125 Locust, Kansas City, MO 64106
10. ██████████. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 08/19/2020

CRN: KC20051515

I, Det. Chason Crowell #5228  
(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 08/01/2020, at 5621 E. 12<sup>th</sup> St in  
(Date) (Address)

Kansas City, Jackson Missouri Thorne McKendrick, WM, 12/26/2000  
(County) (Name of Offender(s))

[REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 08/01/2020 at 2124 hours, Officers of the Kansas City Missouri Police Department were dispatched to 12<sup>th</sup> and Lawndale Ave., Kansas City, Jackson County, Missouri on reported shooting. Upon arrival, Officers observed the victim, later identified as MICHAEL W. BROWN laying on the street outside of 5621 E. 12<sup>th</sup> St. The victim was suffering from a gunshot wound to the head. The victim was transported to Truman Medical Center where he later died of injuries.

During the course of the investigation, security video was obtained from 5621 E. 12<sup>th</sup> St. The security video shows the suspect ride up on a bicycle and get into the vehicle parked in front of 5621 E. 12<sup>th</sup> St. The victim is seen walking out the front door and down to the vehicle. As the victim gets close to the car, the suspect is seen getting out of the back seat. The victim grabs the suspect from behind and puts his arms around the suspect. The suspect can be seen reaching for his waistband. The victim takes the suspect to the ground and the suspect shoots the victim. The victim laid on the ground as the suspect got up and ran East on 12<sup>th</sup> St.

On 08/01/2020, the victim's father was interviewed by detectives. The victim's father watched the security video from 5621 E. 12<sup>th</sup> and identified THORNE MCKENDRICK as the person in the video who shot his son. He recognized MCKENDRICK due to them being neighbors in the past and further advised that he tried to mentor MCKENDRICK in the past as well.

On 08/01/2020, witness #1 was interviewed by detectives and advised he and the victim were inside 5621 E. 12<sup>th</sup> St. working, when he looked at his security cameras and observed someone inside his girlfriend's car. He told the victim there was someone inside his girlfriend's car and the victim went outside. The witness went outside after the victim and

**PROBABLE CAUSE STATEMENT FORM**

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once outside, he observed the victim and the suspect in a struggle. He observed the suspect shoot the victim then run East on 12<sup>th</sup> Street and turn North on Topping. He described the suspect as a white male with short blonde hair, younger with a red shirt carrying a flashlight.

On 08/01/2020 witness #2 was interviewed by detectives and advised he was coming out of 5720 E. 12<sup>th</sup> St. when he heard a commotion and people yelling. He observed the suspect running with a flashlight in one hand and a gun in the other. He watched the suspect run East on 12<sup>th</sup> then run North onto Topping past Perry. Witness #2 described the suspect as a white male, 5'5, younger with shaggy hair and dark clothing.

On 08/08/2020, witness #1 was re contacted and shown a photo lineup of six white males all similar in appearance. The witness pointed to the person in the number four position positively identifying THORNE MCKENDRICK, WM, 12/26/2000 as the person he observed shoot the victim and flee the scene.

Printed Name Det. Chason Crowell #5228 Signature /s/ Det. Chason Crowell #5228

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

\_\_\_\_\_  
Judge

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