

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	20-006963
PROSECUTOR NO. :	095461817
OCN:	EO007327

STATE OF MISSOURI,

PLAINTIFF,)

VS.

JOSEPH W. MAYES

704 SW 15th Street, Apt. #12

Blue Springs, MO 64015

DOB: 08/02/2000

Race/Sex: W/M

DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the **class C felony of involuntary manslaughter in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 9, 2020, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Harry E. Bowers by shooting him.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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.

State vs. Joseph W. Mayes

Count II. Armed Criminal Action (571.015-001Y20205299.0)

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) (571.015.2) (571.015.3), RSMo, in that on or about on or about November 9, 2020, in the County of Jackson, State of Missouri, the defendant committed felony of involuntary manslaughter in the first degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of involuntary manslaughter 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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/ Brian Morris

Brian Morris (#66094)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
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WITNESSES:

State vs. Joseph W. Mayes

1. Harry E. Bowers, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. Dylan M. Boyd, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. Emmilee E. Boyle, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. PO Coby Jacobsen, 1100 SW Smith, Blue Springs, MO 64015
5. DET Kevin Lange, 1100 SW Smith, Blue Springs, MO 64015
6. Sarah J. Rinehart, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

STATEMENT OF PROBABLE CAUSE

DATE:	November 10, 2020	Blue Springs Police Case Number	2020-006963
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I, **Det. Kevin Lange** a police officer with the Blue Springs Police Department knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1.) I have probable cause to believe that on **November 9, 2020**, at **McDonalds 814 N. M-7 Hwy, Blue Springs, Jackson County, Mo 64014, Joseph W. Mayes W/M 08-02-2000, [REDACTED], of 704 SW 15th Street, Apt. #12, Blue Springs, Mo 64015** committed one or more criminal offense(s).

2.) The facts supporting this belief are as follows:

On Monday, November 9, 2020, at approximately 1951 hours, Blue Springs Police Officers were dispatched to the McDonalds restaurant, 814 N. M-7 Hwy in reference to a shooting.

Both Blue Springs Police Officers and Central Jackson County Fire Department responded and attempted life saving measures for the victim, Harry E. Bowers B/M 01-16-2001, who was found in the men's restroom. Mr. Bowers was unresponsive and transported to an area hospital where he was pronounced dead.

I arrived on scene at approximately 2034 hours, at 2059 hours, I was directed to a subject, Emmilee E. Boyle W/F 02-06-2001, who is another manager for McDonalds. She stated she is good friends with Mr. Bowers and that she, her boyfriend, Brenden M. Phillips, "Joey" (Joseph Mayes) and "Harry" (Harry Bowers) were all hanging out and since her McDonalds had run out of bulk ketchup she had went to the McDonalds on Woods Chapel Road to get some additional ketchup and return it to the store on M-7 Hwy.

While at the store, Ms. Boyle said she was outside when "Joey" came running out saying he had accidentally shot "Harry". "Joey" then took off running southbound from McDonalds.

While talking to Ms. Boyle, Grain Valley Police Department called Blue Springs Police Dispatch advising the suspect "Joey" and a Brenden Phillips had been in Grain Valley, Mo for a place to hide out and "Joey" had told the resident he had shot "Harry".

At 2151 hours, Grain Valley Police Department advised they had "Joey" and two other subjects detained in their parking lot.

Blue Springs Police Officers were dispatched to Grain Valley Police Department and brought back "Joey", Mr. Phillips, and Gage B. Garrison W/M 06-10-2001.

On Tuesday, November 10, 2020, I contacted Mr. Mayes in his cell and asked if he wanted to talk to me in reference to his arrest in which he agreed. Ankle cuffs were placed on Mr. Mayes, who was escorted to Interview Room #231. I gave Mr. Mayes a styrofoam cup so he could get some water prior to the interview.

At 0103 hours, I presented Mr. Mayes with a Miranda Warning in which he read acknowledging he could read and write the English language and then read items #1 – 5, before signing the document allowing me to speak to him.

Mr. Mayes said all four were hanging out and had went to the McDonalds when he and Harry were in the men's restroom. Mr. Mayes said he was at the urinal when Harry had come up from behind him and placed his gun to his stomach on the right side and pulled the trigger to hear it click.

In turn, Mr. Mayes pulled his gun and pointed it at Harry and pulled the trigger also, but not knowing there was a chambered round in the gun at which time he said he accidentally shot Harry. Mr. Mayes said he went to check on Harry who had fallen to the ground and Harry said, "You shot me".

Mr. Mayes ran outside and told his friends that he accidentally shot Harry and took off running. Mr. Mayes said his friend Brenden had caught up with him in the neighborhoods.

Mr. Mayes said he then called his friend Gage and told him he needed a ride to Grain Valley, Mo.

Mr. Mayes said they had ended up at an uncle's house where he shaved his shoulder length hair down to a buzz cut in an attempt to change his appearance. Mr. Mayes said his uncle convinced him to turn himself in at which time he responded to the Grain Valley Police Department and surrendered.

I asked Mr. Mayes how long he had known Mr. Bowers, he said about four years and for the last two months they had been sharing an apartment.

I asked if this was normal for him and Mr. Bowers to point guns at each other, he replied, "Yes".

I then asked where his clothes that he was wearing along with the gun was; he said in Gage's car, it was a 9mm.

Upon conclusion of the interview, Mr. Mayes asked about the status of Harry, it was then I told Mr. Mayes that his friend Harry had died. Mr. Mayes became very emotional and started crying. I did allow Mr. Mayes to use my cell phone to call his mother before returning him to his cell.

Ms. Boyle had described "Joey's" gun as a semiautomatic handgun which was silver and black. The slide area was silver, and the rest of the gun was black.

Detectives obtained a search warrant and located the 9mm Ms. Boyle had described.

Detective Kevin Lange #837
Printed Name

/s/ Kevin Lange

Signature