

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

<b>POLICE NO. :</b>	KC20076875
<b>PROSECUTOR NO. :</b>	095462492
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ISAIAH J.J. BROWN</b>	)	
<b>5346 Norton Ave.</b>	)	<b>CASE NO. 2116-CR</b>
<b>Kansas City, MO 64133</b>	)	<b>DIVISION</b>
<b>DOB: 03/02/1991</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Burglary - 2nd Degree (569.170-001Y20202204.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about November 8, 2020, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at 1200 Gregory Kansas City, Missouri and possessed by for the purpose of committing Stealing therein.

The range 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 one (1) year 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 II. Stealing - \$750 Or More (570.030-035Y20202308.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of

## **State vs. Isaiah J.J. Brown**

Section 570.030, RSMo, committed the **class D felony of stealing**, punishable upon conviction under Section(s) 558.002 and 558.011, RSMo, in that on or about November 8, 2020, in the County of Jackson, State of Missouri, the defendant appropriated the following: HP laptop, HP Pavillion laptop, Apple Ipad, Apple pencil, Lenovo Laptop, and Apple Iphone, a value of at least seven hundred fifty dollars, in the possession of ■ and ■, and defendant appropriated such property without the consent of ■ and ■ and with the purpose to deprive ■ and ■ thereof.

The range 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 one (1) year 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 III. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)**

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 December 11, 2020, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner possessed an automobile, namely a white Ford F450.

The range 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 one (1) year 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. Property Damage - 1st Degree - Damage To Motor Vehicle With Intent To Steal (569.100-003Y20202902.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the **class D felony of property damage in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 13, 2020, in the County of Jackson, State of Missouri, the defendant knowingly damaged a gray 2014 BMW, a motor vehicle by breaking the front and rear windows of the vehicle which property was possessed by ■ while making entry into the vehicle for the purpose of committing the offense of stealing.

The range 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 one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in

## **State vs. Isaiah J.J. Brown**

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. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)**

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 December 15, 2020, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner possessed an automobile, namely a white 2018 Chevrolet Cruze.

The range 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 one (1) year 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 (571.070-001Y20205212.0)**

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 concealable firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about January 5, 2021, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Glock 43, a firearm, and on 06-18-2015, the defendant was convicted of the felony of Resisting Arrest Creating a Substantial Risk of Serious Injury or Death in the 16th Circuit Court of Jackson County, Missouri.

The range 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 one (1) year 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 VII. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)**

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,

**State vs. Isaiah J.J. Brown**

committed the **class D felony of unlawful possession of a concealable firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about January 5, 2021, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Beretta APX, a firearm, and on June 18, 2015, the defendant was convicted of the felony of Resisting Arrest Creating a Substantial Risk of Serious Injury or Death in the 16th Circuit Court of Jackson County, Missouri.

The range 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 one (1) year 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/ Stephanie R. Sang  
Stephanie R. Sang (#68370)  
Assistant Prosecuting Attorney  
412 East 12th Street  
11th Floor  
Kansas City, MO 64106  
(816) 881-3519  
SRSang@jacksongov.org

**WITNESSES:**

1. PO Jacob M. Alexander, 1125 Locust, Kansas City, MO 64106
2. PO De'Andre L. Allen, 1125 Locust, Kansas City, MO 64106
3. PO Ronald R. Davis,
4. SGT Jeffrey M. Epstein, 1125 Locust, Badge #5092, Kansas City, MO 64106
5. PO Jeremy W. Gragg, 1125 Locust, Kansas City, MO 64106
6. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. CST Sarah Jones, 2645 Brooklyn Ave, Kansas City, MO 64127
8. DET Danielle M. Kincaid, 1125 Locust, Kansas City, MO 64106
9. PO Jack Kyle, 1125 Locust, Kansas City, MO 64106

**State vs. Isaiah J.J. Brown**

10. DET Robert A. Martin, 1125 Locust, Kansas City, MO 64106

11. [REDACTED]

[REDACTED], 1125 Locust, Kansas City, MO 64106

13. PO Westley A. Wasmer, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 01-05-2021

CRN: KC20087280

I, Detective Robert Martin 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 01-21-2021, at 4434 Gardner Avenue in  
(Date) (Address)

Kansas City, Jackson Missouri Isaiah Brown  
(County) (Name of Offender(s))

B/M 03-02-1991 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 11/08/2020, Kansas City Missouri Police Officers were dispatched to 1 [redacted] W Gregory Boulevard, Kansas City, Jackson County, Missouri in regard to a residential burglary.

Upon arrival, Officers contacted the homeowner, [redacted], who stated she was in the front yard doing yardwork when someone broke into her residence. The garage door on the east side of the residence was open while she was doing yardwork and that is how the suspect gained entry.

I was contacted by Officers and responded to the scene [redacted] said she went inside to check the time after working in the front yard and when she was in the garage, she observed the front passenger door on her vehicle to be slightly open. [redacted] proceeded to go into her house to get something out of her purse and noticed her purse was missing and a cup holder from her car was sitting in her kitchen. She observed several electronics (her husband's work phone and laptop, her son's iPad [valued at approximately \$1000] and pencil [valued at approximately \$100], and two other laptops [valued at approximately \$400 and \$1200]) missing from the counters/table. When she went back to her car she observed several items from in her vehicle to be missing as well (approximately value unknown).

[redacted]. ([redacted]'s husband) arrived home while officers were there. He told Officers his work phone (black iPhone XR valued at approximately \$1000) and HP Elitebook laptop (valued at approximately \$1000) were property of the Department of Justice.

A DNA qualified Officer responded to the scene and processed several places the suspect had touched. A cigarette butt [redacted]. stated did not belong to her was also located inside the vehicle. It was recovered by Officers and submitted to the Crime Lab for processing.

## PROBABLE CAUSE STATEMENT FORM

CRN KC20087280

On 11/09/2020 I reviewed city camera footage in the area of west Gregory Boulevard/Ward Parkway, Kansas City, Jackson County, Missouri in regard to the burglary. The camera captures ██████'s residence. I observed the garage door on the east side to be open and ██████ working in the front yard. At 1608 hours on 11/08/2020, a dark color vehicle parked in the number three lane on Ward Parkway just to the north of 1200 W Gregory Boulevard with its hazard lights on. At 1615 hours, an unknown male later identified as **Isaiah Brown, B/M, 03/02/1991**, exited the vehicle and walked down the sidewalk. He stopped just north of the driveway and stopped. He returned to the vehicle. At 1617 hours, **Brown** walked back to the residence and entered the open garage. At 1626 hours, **Brown** exited the garage door carrying a bag, returned to the vehicle and left the area southbound.

On 12/02/2020 the Missouri State Highway Patrol created a CODIS report showing the DNA recovered off the dropped cigarette butt in ██████'s car matched the DNA of **Brown**. A person of interest was issued for **Brown**.

On 12-11-2020, ██████, stated he was at 8817 State Line Road, Kansas City, Jackson County, Missouri when his 2019 white Ford F450 with VIN 1FT8W4DT0KEF69370 was stolen. (KC20084891)

On 12-15-2020, ██████ reported the Missouri license plate 1PFH29, previously affixed to his 2008 Ford F350 had been stolen while parked at 1515 West 9<sup>th</sup> Street Kansas City, Jackson County, Missouri. (KC20085748)

On 12-15-2020, Det. Martin responded to the ██████'s residence and was notified their 2019 Ford F450 had been recovered in Claycomo, Missouri. Det. Martin recovered the license plate 1PFH29 from the rear of the truck.

On 12-15-2020, ██████. of Olsson reported their company vehicle, a white Chevrolet Cruz, Kansas license 509MJN, VIN 1G1PA5SH0D7237461, had been stolen from 700 W 76th Street, Kansas City, Jackson County, Missouri. At 0957 hours **Brown**, was arrested sleeping inside the vehicle.(KC20085679) Also inside the vehicle was a Postal workers shoulder bag harness, boots, and vehicle maintenance kit stolen from 7420 Troost Avenue, Kansas City, Jackson County, Missouri on 12-15-2020. (KC20085827)

On 12-15-2020, **Brown** was interview by Det. Martin regarding the stolen Ford F450 and Chevrolet Cruz and admitted to stealing both vehicles.

On 12-16-2020, ██████. provided surveillance video of **Brown** entering vehicles and stealing property from them along 9<sup>th</sup> Street, including E.K.'s 2008 Ford F350. **Brown** was observed keeping an eye out while an unknown party removed the license plate from the rear of the truck.

On 12-21-2020, ██████. stated she last saw her 2016, black over white, Land Rover, Range Rover Evoque with Missouri license ZE5J1Z, VIN SALVP2BG5GH078642, parked at 4434 Gardner Avenue, Kansas City, Jackson County, Missouri. She stated on 12-21-2020 she observed her vehicle had been stolen. (KC20087280)

On 12-26-2020, ██████ reported the Missouri license plate ZF0G6J stolen from his wife's 2015 Land Rover, Range Rover. (KC20088253)

## PROBABLE CAUSE STATEMENT FORM

CRN KC20087280

On 01-04-2021, Det. Martin checked license plate reader cameras and observed the stolen Missouri license plate ZF0G6J on a black over white Land Rover, Range Rover, Evoque. Due to prior experience in patrol and property crimes related investigations Det. Martin knew it to be common practice to steal a license plate of a same vehicle to replace the license plate of a stolen vehicle. He then put out an attempt to locate bulletin for the black over white Land Rover, Range Rover Evoque with license plate ZF0G6J.

On 01-04-2021, at 2341 hours, Det. Martin was notified the Range Rover Evoque with Missouri license ZF0G6J had been located at 1051 North Cambridge Avenue, Kansas City, Jackson County, Missouri. Det. Martin responded to the location and began conducting surveillance on the vehicle. While conducting surveillance he observed **Brown** and a white female later identified as [REDACTED] W/F 12-15-1988 get into a white Ford Explorer parked next to the Range Rover. The two then drove away from the parking lot and returned a short time later to back into the parking spot again. While backing in Det. Martin observed Thin Blue Line, Thin Red Line, and "Caution K-9" stickers on the vehicle. They then began moving property from the Explorer to the Range Rover. After moving the property they went into the hotel leaving both vehicles running. Det. Martin notified patrol officers in the area who moved in and took possession of the vehicles. Officer Wasmer located [REDACTED] in the hallway and recognized her by the description provided by Det. Martin while doing surveillance. [REDACTED] advised she was staying in room 258. Det. Martin responded to room 258 and began giving commands for **Brown** to exit the room. **Brown** exited the room and was placed in handcuffs for his person of interest for burglary. Det. Martin then responded to [REDACTED] who was standing outside, without handcuffs, smoking a cigarette and walking her dog on a leash. [REDACTED] gave consent for the search of the hotel room.

Det. Martin and Det. Richter then began to conduct a search of the room for property stolen in regards to burglaries, theft from autos, and other contraband. While searching two handguns were located under the front mattress corner of the bed. The handguns consisted of a Glock 43 with serial BATC112, reported stolen out of Claycomo, Missouri and a Beretta APX with serial A022728X, both of which were loaded with one round in the chamber.

On 01-05-2021, Det. Martin and Kincaid interviewed **Brown** regarding the Ford Explorer (KC21000525), Land Rover Range Rover Evoque (KC20087280), the stolen license plate on the Evoque (KC20088253), the residential burglary (KC20076875) and the two firearms located in the hotel room. **Brown** stated he went to Quiktrip in the Range Rover Evoque and stole the Ford Explorer from there. He stated he went to a place over off of Front Street on the way up to Harrah's casino, the area of 4432 Gardner, and stole the Range Rover Evoque. He then found a gray Range Rover and stole the license plate off of it to place on the Evoque. **Brown** stated the two firearms in the mattress were his guns and he had had them on his person. He stated the Glock 43 he has had for "a minute" commonly referring to an extended period of time that is unsure. He stated he has been robbed of the stuff he has by the people he steals with so carries the gun. **Brown** admitted to committing the burglary. He stated he drove by and saw two juveniles leave on bicycles from the residence and [REDACTED] doing yardwork out front. The garage door on the residence was open. **Brown** stated he knew there wasn't a male at the residence because [REDACTED] was doing the yardwork and if a male was there, he would be the one doing the yardwork. He went and parked near the house and turned the hazard lights on in the vehicle he was driving. He exited the vehicle, entered the open garage and took items (car keys, purse, and laptops) from inside the residence and the vehicle parked in the garage.



**PROBABLE CAUSE STATEMENT FORM**

CRN KC20087280

On 10-08-2009, **Brown** was convicted of felony theft \$500-\$25,000, in Clinton County Circuit Court, Plattsburg, Missouri. (09CNCR0000501)

On 02-19-2020, **Brown** was convicted of felony 1<sup>st</sup> Degree Tampering with a Motor Vehicle, in Jackson County Circuit Court. (1416CR0209501)

On 06-08-2015, **Brown** was convicted of felony resist arrest risking death or injury, in Jackson County, Missouri Circuit Court. (1516CR0193401)

**Brown** has a consistent record of sleeping in vehicles or hotels, having no permanent residence, and using vehicles he steals as a primary form of transportation. Due to this he is hard to locate and apprehend. **Brown** being a felon and admitting to possessing guns while frequently committing theft from autos, auto theft, and burglaries makes him a danger to the citizens of Jackson County, Missouri.

Printed Name Det. Robert A. Martin Signature /S/Det.Robert A. Martin

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

\_\_\_\_\_  
Judge

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