

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

<b>POLICE NO. :</b>	16-065368
<b>PROSECUTOR NO. :</b>	095447124
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>TERRANCE A JONES</b>	)	
<b>2937 Mersington</b>	)	<b>CASE NO. 2116-CR</b>
<b>Kansas City, MO 64128</b>	)	<b>DIVISION</b>
<b>DOB: 03/26/1985</b>	)	
<b>Race/Sex: B/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 September 2, 2016, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Brandon Johnson caused the death of Brandon Johnson 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 Brandon Johnson as a result of the perpetration of the class A felony of robbery in the first degree under Section 569.020 (2) RSMo, and 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. Terrance A Jones**

**Count II. Robbery 1st Degree (569.020-001Y19791299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 2, 2016, in the County of Jackson, State of Missouri, the defendant forcibly stole a backpack and U.S. currency in the possession of Brandon Johnson, and in the course thereof the defendant was armed with a deadly weapon.

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 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 September 2, 2016, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person, Brandon Johnson and as a result of the above described conduct, Brandon Johnson suffered injury or death.

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.

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.

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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  
jtatum@jacksongov.org

**WITNESSES:**

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. Brandon Johnson, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
6. PO Jared T. Littleton, 1125 Locust, Kansas City, MO 64106
7. DET Nicholas A. Sola, 1125 Locust, Kansas City, MO 64106
8. [REDACTED]. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

**FILED**  
**DIVISION 25**  
**PROBABLE CAUSE STATEMENT FORM**

**22-Jan-2021 14:02**

Date: 01-21-2021

CRN: 16-065368

CIRCUIT COURT OF JACKSON COUNTY, MO

BY *Pessica Gagnely* DCA

I, Detective Bonita Y. Cannon, #4585, 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 09-02-2016, at 28<sup>th</sup> Terrace and Mersington in  
(Date) (Address)

Kansas City, Jackson Missouri Terrance A. Jones  
(County) (Name of Offender(s))

B/M 03-26-1985 / [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 09-02-2016, officers of the Kansas City Missouri Police Department were dispatched to 27th St and Mersington Ave on a reported shooting. Upon arrival, they located the victim deceased in the street, near the intersection of 28th Terrace and Mersington, Kansas City, Jackson County, Missouri. 9mm shell casings were recovered from near the victim's body at the scene.

The Jackson County Medical Examiner ruled the victim's death a homicide as a result of multiple gunshot wounds.

Witness #1 ([REDACTED]) stated Jones left walking from 3230 Myrtle with the victim, heading to the victim's residence. Witness #1 stated Jones offered to walk the victim home because the victim was intoxicated. Witness #1 stated Jones was alone, when he returned to witness #1's residence. Witness #1 stated Jones told him, he left the victim "about half way home." Witness #1 stated Jones told him the victim got a ride from an unknown male, he met earlier at a liquor store. Witness #1 stated he walked to the liquor store at 35th and Cleveland with the victim and Jones earlier. Witness #1 also provided a conversation from his Facebook account between him and [REDACTED]. During their conversation Jones, [REDACTED] and [REDACTED] talked about what happened to the victim.

Witness #2 ([REDACTED]) recorded a telephone conversation with Jones nephew, [REDACTED]. During that conversation [REDACTED] told witness #2 he heard Jones telling witness #1 he walked with the victim to 31st and Mersington, before heading back to 3230 Myrtle. Witness #2 stated

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██████ also told witness #2, Jones had a firearm with him when he left walking with the victim. Witness #2 stated ██████ told her the victim had money, Marijuana and a cell phone on him when he left the residence, with Jones.

Witness #3 (██████) stated she used to date Jones and she has known Jones for a few years. Witness #3 stated although she and Jones are no longer in a relationship, Jones keeps in contact with her. Witness #3 stated Jones told her in late September or October of 2016 that he was walking the victim home, the victim started making negative comments about Jones brother. Witness #3 stated Jones told her that he shot and killed the victim. Witness #3 stated she asked what type of firearm he used and what he did with it after the murder. Witness #3 stated Jones told her it was a 9 mm handgun that he used, and after the murder he sold it to a friend. During her interview witness #3 was shown and identified Jones in a photograph. Witness #3 provided detectives with an open box of live 9mm Federal and S&B rounds. She stated she found the live rounds in her vehicle after Jones returned her vehicle to her. The live rounds were recovered and forwarded to the KCPD Crime Lab for analysis.

Witness #3 also stated Jones told her he shot a male on Loma Vista the day before the homicide. Detectives located the reported Aggravated Assault that occurred at 7613 Loma Vista Drive (CRN #16-65139) that occurred on 09-01-2016. The victim of the Aggravated Assault suffered a non-life threatening gun shot injury to his hip.

Witness #4 (██████) stated he was with the victim at a Chief's Football game prior to dropping the victim off at a house on 34th and Myrtle. The victim told witness #4 he had to pick up some money from his friend "██████" who was later identified as ██████. Witness #4 stated he dropped the victim off at approximately 2350 hours.

On 02-20-2018 Jones was transported to Police Headquarters. Terrance Jones (B/M 03-26-1985) was advised of his Miranda Rights via the Miranda Waiver at 1713 hours. Jones agreed to speak with detectives and signed the Miranda Waiver at 1713 hours.

During his interview Jones admitted to being at the residence with the victim. He admitted to leaving the residence with the victim and that the victim was intoxicated. Jones stated he intended to walk the victim home however, he and the victim walked between two and four houses away from the address they were at. Jones stated the victim called a friend and after

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waiting twenty to thirty minutes, the victim got into a raggedy Impala with unknown persons before leaving. It should be noted that the victim's cell phone records do not support Jones' version of events, as the victim never called an unknown person for a ride.

Jones denied killing the victim. When asked why someone would tell us he is responsible for the victim's death, Jones got upset, raised his voice and uttered, "No one could have seen anything, the only people that could have told ya'll that would be him or him" (while pointing to [REDACTED], [REDACTED] and [REDACTED] photograph).

On 03-06-2018 detectives received a KCPD Crime Lab report confirming the shell casings from the Aggravated Assault reported on 09-02-2016 CRN #16-065139 and this Homicide were fired from the same firearm. Jones had previously admitted to witness #3 that he committed both the Aggravated Assault and this Homicide.

On 07-03-2018 Det. Findley and I responded to Jefferson City Department of Corrections to contact [REDACTED]. [REDACTED] was advised of his Miranda Rights via the Miranda Waiver at 1125 hours. Stanley stated he understood his rights, signed the waiver and agreed to speak with detectives.

[REDACTED] acknowledged knowing the victim. He stated Jones is his [REDACTED]. He further stated he was not at the address the night the victim was killed. He also stated he saw the victim the day before he was killed. [REDACTED] denied having any knowledge or being involved in the death of the victim. Phone records for the telephone provided by [REDACTED] showed several calls between the victim and [REDACTED] on 09-01-2016 between 2334 hours and 2348 hours (prior to the victim being dropped off to meet Stanley).

On 12-28-2020 Det. VanVickle and I responded to Algoa Correctional Center, 8200 No More Victims Road after receiving a handwritten letter from [REDACTED]. It should be noted that [REDACTED] also wrote a letter to the Prosecutor's Office asking for leniency on a sentence he is serving for murder. However, he made no mention of this with KCMO Detectives during the December 2020 interview, nor did KCMO Detectives offer him any promises of the same.

[REDACTED] was advised of his Miranda Rights to which he stated he understood. [REDACTED] stated Jones whom he refers to as his [REDACTED] told him the morning the victim was found the following:

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He (Jones) was upset with the victim for talking about his brother (who was incarcerated). The victim called his brother a "Rat" earlier in the evening. [REDACTED] stated Jones told him he left with the victim to walk the victim home. At some point he struck the victim in his face. [REDACTED] stated Jones told him he tried knocking the victim out but failed in doing so. Jones told [REDACTED] shot the victim five times with a 9mm SCCY. Jones then sold the firearm to "Hood" (previously identified as [REDACTED]). The same information was relayed by Witness 3, who does not know [REDACTED]. [REDACTED] was contacted and denied participating in the sale of a firearm.

[REDACTED] stated Jones had money during their conversation but did not have any the night before. [REDACTED] stated Jones is known for carrying more than one firearm. He further stated Jones is "sneaky" and he wouldn't have let anyone know prior to them leaving the house, that he was upset with the victim.

[REDACTED] stated the victim did not have a firearm and would not have been doing anything wrong, even when he said Jones brother was a "Rat." [REDACTED] stated he finally came forward because he wanted to give the victim's family some peace of mind. He also stated the victim was a good person and often kept [REDACTED] out of trouble.

[REDACTED] stated he was upset with Jones for killing the victim, because the victim repeatedly praised Jones throughout the night.

Detectives requested the Firearms Lab compare the 9mm Luger cartridge cases in CRN 16-065139 to the 9mm Luger cartridge cases in CRN 16-065368. Through microscopic comparison it was determined that the two 9mm Luger cartridge cases in CRN 16-065139 were fired in the same firearm as the 9mm Luger cartridge case in CRN 16-065368.

The case Detective is requesting an arrest warrant in lieu of a summons for the listed offender as a firearm was used in this offense. "Jones" has had prior contacts with law enforcement officers. In light of this incident and his conduct since then the case Detective believes the offender is a danger to himself and the public.

Printed Name Det. Bonita Y. Cannon, #4585 Signature /s/Det. Bonita Cannon, #4585

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

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\_\_\_\_\_  
Judge

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