

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

POLICE NO. :	KC21005824
PROSECUTOR NO. :	095462884
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
CURTIS HARRIS)	
6415 Main Street)	CASE NO. 2116-CR
Kansas City, MO 64113)	DIVISION
DOB: 03/15/1967)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 January 26, 2021, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Charles A Blakey 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.

Count II. Armed Criminal Action (571.015-001Y20205213.0)

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 January 26, 2021, in the County of Jackson, State of

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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 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 571.015.1, 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen 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 five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 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.

State vs. Curtis Harris

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
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(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

1. Charles A Blakey, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. PO Mark A. Diviak, 1125 Locust, Kansas City, MO 64106
3. PO Corey T. Sanders, 1125 Locust, Kansas City, MO 64106
4. DET Ephraim Vega, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01-28-2021

CRN: KC21005824

I, Detective Ephraim Vega #5606, KCPD
(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 01-26-2021, at 2843 Indiana Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Curtis E. Harris
(County) (Name of Offender(s))

B/M 03-15-1967 committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 01-26-2021 at 2105 hours, officers with the Kansas City, Missouri Police Department were dispatched to 29th and Indiana Avenue in Kansas City, Jackson County, Missouri on a reported Injury Accident. The call for service location was subsequently updated to 2843 Indiana Avenue and the calling party advised a vehicle struck the residence and the male inside was not moving. Police and medical arrived on scene and the victim was pronounced deceased. The victim was found to have sustained apparent gunshot wounds to the face.

The vehicle in which the victim was occupying was identified as a silver 2020 Dodge Journey with a Kansas license plate of R008479 and VIN #3C4PDCGB6LT271177. A computer check revealed this vehicle to be registered to Enterprise Rental.

Detectives from the 1030 Homicide Squad along with the Crime Scene Investigations Unit responded to the scene of the homicide. Swabs of the crime scene were taken and the scene processed.

On 01-27-2021 at approximately 1031 hours, Det. Haskett with the Cold Case/Missing Persons Unit contacted the reporting detective via phone to advise that a male responded to East Patrol Station requesting to speak with detectives in regard to the above captioned case.

Det. Gantt and I responded to East Patrol Station and made contact with **Curtis E. Harris B/M 03-15-1967**. **Harris** was escorted to interview room #2 where he was advised of his Miranda Rights which he understood, waived and agreed to give a statement. During the interview, **Harris** said the following: On 01-26-2020, **Harris**, an unknown female, a male named "Shaq" and **Charles Blakey** (Victim) were all occupying a grey Dodge Journey that Harris's roommate had rented for him. The unknown female was the driver, **Harris** sat in the in the front passenger seat, Shaq was seated in the rear driver's side passenger seat and **Blakey** was seated behind **Harris**. **Blakey** was carrying a Kel-Tec rifle and had a bottle of Methamphetamines.

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The group drove to Harrah's Casino where the unknown female and Shaq were dropped off. **Harris** then had **Blakey** drive while he (**Harris**) sat in the front passenger seat. They drove to an unknown location to purchase marijuana. **Harris** gave **Blakey** \$300 to purchase 28 ounces of Marijuana which cost \$250. **Blakey** exited the vehicle and purchased marijuana for **Harris** from an unknown black male. **Blakey** returned to the vehicle and drove around while they both smoked marijuana. **Harris** had a scale in the vehicle and weighed the marijuana which was 7 ounces light. When **Harris** confronted **Blakey** about the missing marijuana he (**Blakey**) became agitated and refused to give **Harris** the remaining \$50. Not wanting to escalate the situation **Harris** did not continue the conversation.

As they were driving around, **Blakey** handed **Harris** a .380 handgun and asked him if he wanted to purchase it. **Harris** was not interested in the gun because he is a felon but he (**Harris**) did start to unload and handle the gun. **Blakey** became agitated with **Harris** for doing so which made him (**Harris**) reload the gun. **Blakey** then grabbed the handgun away from **Harris** and threatened to kill him (**Harris**) and **Harris's** roommate as well as take his (**Harris's**) marijuana and money. **Blakey** then pointed the handgun at **Harris** which prompted them to struggle over the gun.

Harris gained control of the handgun but immediately became fearful when **Blakey** began reaching for the Kel-Tec rifle. In fear for his life, **Harris** fired what he believed to be 6 shots at **Blakey** causing them to crash into the driveway of 2843 Indiana. **Harris** exited the vehicle with the 380 handgun and attempted to get a ride from an occupied SUV that did not stop for him. **Harris** then saw a running vehicle that was unoccupied and entered it before being confronted by a female. **Harris** drove off and eventually ended up at Independence and Paseo where he abandoned the vehicle.

Harris dumped the 380 handgun in a trash can on Independence Avenue somewhere between Paseo and a gas station off of Highland Avenue. **Harris** does not remember how he returned home but admitted to changing his clothes and leaving them in the house. **Harris** was transported to East Patrol by his mentor who he did not want to identify.

At the conclusion of the interview, **Harris** was advised that he would be placed on a 24-hour investigative hold and he was then escorted to EPD detention.

On 01-27-21, at approximately 1925 hours, Detectives Gantt, Fitzgerald, Bedell, Forensic Specialist II (CSI) Kuhn and I responded to the 6415 Main Street to execute a search warrant in regard to the homicide. During the interview **Harris** told detectives that the articles of clothing he wore during the incident were later placed in his roommate's closet and possibly elsewhere in the residence. Enterprise Rent-a-car records for the vehicle that the victim was driving at the time of the shooting, showed that both **Harris** and his roommate, Other #1, were on the rental agreement. The search warrant was granted through the 16th Judicial Court, Jackson County, Missouri.

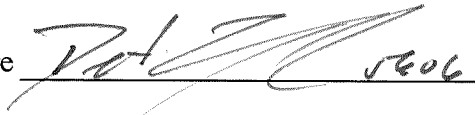
Upon our arrival, we contacted Other #1, presented her with a copy of the warrant, and she allowed us in the residence without issue. The residence was a two story structure and both Other #1's and HARRIS' bedrooms were upstairs. Other #1 led us to her bedroom closet, where we observed a brown jacket on the closet floor. CSI Kuhn photographed and recovered the jacket. Other #1 then directed us to **Harris'** bedroom which was the

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next bedroom south of her room. In the hallway/stairwell, just north of **Harris**' bedroom door, was a pair of brown boots that appeared to have apparent blood on them. CSI Kuhn photographed and recovered the boots. Inside of **Harris**' bedroom, we observed a blue bandana, a white sock with apparent blood, and a live round of Blazer 40 S&W ammunition; CSI Kuhn photographed and recovered those items, as well.

Other #1 advised that **Harris**' cellular phone was also inside of the residence. During his interview with detectives, **Harris** provided verbal consent to recover his cellular phone; it was also recovered from the residence. Other #1 stated that earlier that morning (01-27-21), **Harris** approached her and said that he did something, something that he needed to speak with detectives about it. **Harris** did not tell Other #1 anything about what occurred but she encouraged him to go speak with detectives.

Printed Name Detective Ephraim Vega #5606 Signature  #5606

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

Judge

Circuit Court of _____ County, State of Missouri.