

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC21026173
PROSECUTOR NO. :	095464535
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
JERRONN E. ANDERSON	)	
1706 E. 18th Street	)	CASE NO. 2116-CR
Kansas City, MO 64108	)	DIVISION
DOB: 10/12/1991	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y20200903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about April 25, 2021, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Gary Taylor by shooting him.

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 April 25, 2021, in the County of Jackson, State of Missouri, the defendant committed felony of murder in the first 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.

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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.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kristiane N. Bryant

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WITNESSES:

1. DET Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106
2. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
64106
5. DET Rodney E. Haney, 1125 Locust, Kansas City, MO 64106
6. DET Ian D. Hobbs, 1200 E. Linwood, Kansas City, MO 64106
7. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
8. DET Christopher S Smith,
9. CST Marisa Smith, 1125 Locust, Kansas City, MO 64106
10. Gary Taylor, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
11. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106
12. PO Joseph R. Wright, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/27/2021

CRN: KC21026173

I, Detective Ian Hobbs #5552, Kansas City, Missouri Police Department, Homicide Unit
(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 04/25/2021, at 19th St. and Vine Street in
(Date) (Address)

Kansas City, Jackson Missouri Jerronn Anderson
(County) (Name of Offender(s))

B/M 10/12/1991 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 04/25/2021 at 2205 hours Officers with the Kansas City, Missouri Police Department were dispatched to 19th and Vine Street, Kansas City, Jackson County, Missouri on a reported sound of shots. Upon arrival they located a victim at 19th St. and Vine Street suffering from an apparent gunshot trauma. The victim (later identified as Gary Taylor) was transported to an area hospital where he was pronounced deceased. Additional victims with non-life threatening injuries were located and transported to area hospitals by ambulance and private conveyance. The manner of death for the deceased victim has been ruled a homicide by the Jackson County Medical Examiner's Office.

While reviewing the various cameras, Detectives observed the victim walking southbound on Vine Street with two of his friends (determined to be Witness #1 and Witness #2). As the group approaches 19th Street the victim stops, and turns towards the north. The suspect, a black male subject with a light complexion, long dreadlocks, wearing a white t-shirt, and black pants is observed approaching the group from the north. As the victim turns back to the south, away from the suspect, the suspect produces a handgun and fires it toward the victim. The victim falls to the ground. After the suspect shoots the victim, both witnesses produce handguns and fire them towards the suspect.

Using the various camera angles, Detectives were able to track the suspect's activity after the shooting. The suspect is observed running northbound on Vine Street along the sidewalk, with visible difficulties. The suspect appears to be favoring one or both legs as he is not running with a typical stride. Surveillance video shows the suspect turn east into the parking lot of the Historic Lincoln Building (1601 E. 18th Street, Kansas City, Jackson County, Missouri) and continue running east out of camera view. At approximately 2207 hours a tan Chevrolet pickup truck exits the parking lot of the apartments located at 1612-1628 E. 19th Street, onto 19th Street. Both of these locations are connected via a common alleyway. The truck continues southbound on Woodland where the figure of a person can be observed laying in the bed of the truck before it travels out of camera view. At approximately 2210 hours the same truck arrives at an area hospital. A black male subject appears to exit the truck bed and walks into the Emergency Department doors. The black male has a light complexion, long

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dreadlocks, and is wearing black pants. This black male checked into the hospital under the name **Jerronn Anderson B/M 10/12/1991**. **Anderson** had responded to the hospital with gunshot wounds to his legs. Detectives responded to the hospital to interview **Anderson**, who stated he was shot in the area of 39th Street & Topping. No associated crime scene was located in that area. Detectives had been provided information **Anderson** left the hospital against medical advice prior to the completion of his treatment. Several additional camera angles of **Anderson** are observed including video of him with a black female wearing a mask covering her mouth and nose just prior to the two exiting the Emergency Department on foot. The two are observed walking to the parking garage located west of the Emergency Department and a few minutes later a white in color sedan is observed leaving the garage. Detectives obtained a subpoena which was subsequently served to TMC Records Unit for the medical records associated to **Anderson**. A review of the medical records revealed **Anderson** have checked into the Emergency Department approximately ten minutes after the shooting. It revealed **Anderson** to have a visitor check in to see him at 0200 hours. A notation was also made with the name Kennedy Payne as the name provided by the visitor upon arrival. The two were observed leaving the Emergency Department on camera and a vehicle similar in appearance to the one observed associated to Payne on LPR is observed leaving the garage west of the Emergency Department.

On 04/26/2021 Detectives received information from a community meeting as well as several TIPS identifying the suspect as “Ron Wilson” on a Facebook profile (<https://www.facebook.com/100028591778165>). While reviewing that Facebook page, Detectives observed “Ron Wilson” bore resemblance to **Anderson**. On 04/28/2021 Detectives observed the vanity name on the Facebook profile had changed to “Hilfiger Tommy” however the web address remained the same.

On 04/28/2021 Detectives contacted Witness #1 who agreed to respond to Police Headquarters and provide a statement. Witness #1 stated he met the victim, and Witness #2 in the 18th and Vine Entertainment District. As Witness #1, Witness #2 and the victim walked southbound on Vine Street he observed the suspect who he described as a black male with a light complexion and dreadlocks standing in the middle of Vine Street near 19th Street. Witness #1 observed the suspect was “clutching” his waistband as if the suspect had a gun. Witness #1 stated he had never seen the suspect before. As Witness #1 and the victim approached 19th Street, the suspect approached them from behind and shot the victim in the back. Witness #1 ran to his vehicle to attempt to get assistance for the victim however by the time he returned others were providing the victim with first aid. Witness #1 identified **Anderson** as the suspect from a photographic line up.

On 05/11/2021 Detectives contacted Witness #2 who agreed to provide a statement. Witness #2 stated he met the victim and Witness #1 at the 18th and Vine Entertainment District. As the three of them walked south on Vine Street Witness #2 heard gunshots and ran from the area. He later received a phone call from Witness #1 informing him the victim had been shot. Witness #2 denied seeing the shooting.

On 05/05/2021 Witness #3 was contacted by detectives and provided a statement. Witness #3 was driving the Chevrolet Silverado previously captured on surveillance video dropping **Anderson** off at the hospital. Witness #3 stated that on the night of the homicide he was gambling on a dice game in the rear of some apartments in the 1600 block of East 19th St. when he heard several gunshots in the area. A male approached the group Witness #3 was with, with apparent gunshot wounds. Witness #3 and other unidentified individuals loaded the unknown male into the bed of the Silverado. Witness #3 drove the unknown male to Truman Medical Center, where he let

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the unknown male out of the bed in the street. Witness #3 drove the Silverado back to the area of the dice game. Witness #3 was unable to identify the male he drove to the hospital. Witness #3 identified one of the individuals at the dice game as the brother of **Anderson**.

On 05/19/2021 at 1553 hours **Anderson** was arrested but declined to provide a statement to detectives.

Printed Name Det. Ian Hobbs #5552 Signature /s/ Det. Ian Hobbs #5552

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

Judge

Circuit Court of _____ County, State of Missouri.