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

POLICE NO	O.: KC21038654
PROSECUTOR NO	O.: 095465130
00	CN:
STATE OF MISSOURI,	)
	LAINTIFF, )
vs.	)
	)
KEVIN RANDOLPH	)
Homeless	) CASE NO. 2116-CR
Kansas City, MO 64106	) DIVISION
DOB: 04/01/1989	)
Race/Sex: B/M	)
	)
DE	FENDANT. )
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# COMPLAINT WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 June 15, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Derrick Williams caused the death of Derrick Williams 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, 571.015.2, 571.015.3, RSMo, in that on or about June 15, 2021, in the County of

# State vs. Kevin Randolph

Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count I, 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.

#### JEAN PETERS BAKER

Prosecuting Attorney Jackson County, Missouri by,

/s/ Jordan L. Logan
Jordan L. Logan (#63975)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor

# State vs. Kevin Randolph

Kansas City, MO 64106 (816) 881-3532 JLLogan@jacksongov.org

# **WITNESSES:**

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- 1. DET Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106
- 2. City, MO 64106
- 3. DET Ian D. Hobbs, 1200 E. Linwood, Kansas City, MO 64106
- 4. **6**4106
- 5. PO Samantha J Mohler-Peters, 1125 Locust, Kansas City, MO 64106
- 6. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
- 9. DET Christopher S Smith, 1125 Locust, Kansas City, MO 64106
- 10. DET Alexis M. Vega, 1125 Locust, Kansas City, MO 64106
- 11. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106
- 12. Derrick Williams, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 13. **64106**

CDN: KC21038654

Date: 06-24-2021			CKIV. KC21030034	
I, Detective Alexis Vega #5528 of the Name and identify law enforcement officer knowing that false statements on this for	, or person ha	ving information as prol	bable cause.)	n are true.
I have probable cause to believe that on		1 , at <u>36</u>	46 Olive Street (Address)	in
Kansas City, Jackson County (County)	Missouri	Kevin Randolph	(Name of Offender(s))	
B/M 04-01-1989 (Description of Identity	v)	comm	itted one or more criminal of	fense(s).
(Description of Identity	y)			

The facts supporting this belief are as follows:

On 06-15-2021 at approximately 1440 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 3646 Olive Street, Kansas City, Jackson County, Missouri on a reported shooting call for service. Upon arrival Officers discovered a deceased black male identified as **Derrick L. Williams, B/M, 05-15-1976** in the residence with apparent trauma to his body. Two witnesses were located inside the residence uninjured. Kansas City, Missouri Fire Department EMS personnel responded to the scene and declared the victim deceased. Detectives of the Kansas City, Missouri Police Department 1020 Homicide Squad responded to the scene to investigate. The Jackson County Medical Examiner's Office ruled the victim's death a homicide. Detectives made contact with several witnesses who were present at the time of the shooting. They agreed to provide a statement in regard to their knowledge of the incident. While processing the scene, Crime Scene Technicians located three spent shell casings bearing head stamp "Blazer 40 S&W" and one bullet fragment.

Witness #1/Victim #2 stated approximately an hour and a half prior to the incident, the suspect drove by the residence (3646 Olive) and was the sole occupant of a red Charger with tinted windows. The suspect yelled up to the porch asking for drugs then got out of his vehicle and walked to the corner while he was on the phone. Someone that was leaving the residence told the suspect that they didn't have anything so the suspect gave them a thumbs up, got in his car, and drove away. At approximately 1400 hours, he was at the residence with the victim and Witness #3 in the upstairs bedroom. He was looking out the second floor bedroom window when he observed the same red Charger drive by and the same "chubby" black male (described as late twenties to midthirties, between 6' and 6'2, with shoulder length dreads) from earlier in the day walking up to the house with a gun in his hand. He stated he went partially down the stairs, with the victim behind him, and looked into the living room. He observed the black male kneeling on one knee by the fireplace pointing a black gun with a "chrome" slide, possibly a 9mm or 40, at him. The suspect yelled "where's the money at?" Witness #1 advised the suspect he didn't have any money and put his hands up. He stated he continued to go further down the stairs with the victim still behind him. The victim told the suspect he didn't have to do this and to put the weapon away. Witness #1 stated he got approximately one foot from the door when the suspect yelled "Nigga, get back!"

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and he observed a muzzle flash. He observed the victim spin and fall to the ground after the shot, ran out the front door, and dove off the porch. He heard three to four additional shots while he fled to the rear of the residence where he found Witness #4. Approximately two minutes later, he heard Witness #3 scream so he went to the front of the house and found the victim lying on the floor deceased. He tried to close the victim's eyes and retrieved his belongings and left the scene in his vehicle. He stated Witness #3 was at the end of the street crying so he picked her up and went to his house to calm down. After the incident, he heard "people from the neighborhood" saying the suspect was at the gas station at 35<sup>th</sup> and Prospect "tripping." The suspect was walking around with a "stick" (rifle) and handgun saying he was the "peace maker" and this is his town and described him as acting "crazy". Detectives showed Witness #1 a color photo lineup containing six males similar in appearance. He identified the person depicted in position #5 as being the person who killed the victim. The person in position 5 was the suspect, **KEVIN RANDOLPH**, **B/M 04-01-1989**. Witness #1 advised **RANDOLPH** was the individual he had observed at or near the residence both times the aforementioned Charger was at the residence.

Witness #2 stated he arrived at the aforementioned location with witness #3. According to witness #2 the residence is a known location where PCP is sold. Witness #2 stated he sat outside on the front porch of the residence interacting with several people while witness #3 entered the residence and went upstairs where the victim was located. Witness #2 stated approximately five minutes later he entered the residence and began to walk upstairs where the victim and witness #3 were located and heard someone downstairs yelling "Where's the money!" Witness #2 stated he told the victim someone was downstairs at which time the victim walked downstairs while witness #1 and witness #3 remained upstairs. Witness #2 stated he heard three gun shots and subsequently went downstairs with witness #3 and found the victim on the living room floor suffering from a gunshot injury. Witness #2 stated he called 911 from his cellular telephone and advised officers upon arrival he did not see who fired the gun or who the individual was asking where the money was as Witness #2 walked up the stairs.

Witness #3 stated she arrived at the aforementioned location with Witness #2. Witness #3 went upstairs while Witness #2 remained on the lower level of the residence and interacted with several other individuals who were already at the residence. The victim arrived at the location shortly after and came upstairs with another unknown male (determined to be Witness #1/ Victim #2). Witness #1 looked out the window and told Witness #3 and the victim someone was approaching the residence with a gun. Witness #3 looked out the window and observed a black male who was approximately 5'10" with dreadlocks and a beard walking up to the residence with a black handgun in his hand. Witness #1 and the victim went downstairs and Witness #2 came upstairs. While Witness #2 and Witness #3 were standing together upstairs, Witness #3 heard someone yell "Where's the money at? I know you got money here!" followed by 3-4 gunshots. Witness #3 went downstairs and observed the victim laying on the floor suffering from a gunshot wound. Witness #3 called 911 but hung up when she realized Witness #2 had already called. Witness #3 went outside and located Witness #1, who had been upstairs with her and the victim. He gave her a ride from the area in his vehicle.

Witness #4 stated he was on the front porch of the residence when the suspect arrived in a burnt orange sports car "Charger or something". Witness #4 described the suspect as a black male with a stocky build and braids. The suspect was approximately 5'11 or 6'0 feet tall. The suspect walked inside the house and witness #4 heard

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talking, heard gunshots, and jumped off of the front porch running toward the back of the residence. He went back inside the house and observed the victim on the floor suffering from a gunshot wound.

Witness #5 advised he was familiar with the residence where this offense occurred and stated his friend "J-Mac" lived there. He advised he was walking to this residence from a nearby location and turned onto Olive Street from 37<sup>th</sup> St. He advised there was no one out on the block so he continued walking past the residence on the east side of the street. He stated he was approaching 36<sup>th</sup> St. when he heard gunshots from behind him. He turned back and observed a heavy set black male with shoulder length dreadlocks running to a burgundy Dodge Charger which was parked on the east side of the street near 3646 Olive Street. He advised this male was wearing either a white t-shirt or tank top. He could not say whether this male had come from 3646 Olive and said he had not seen this Charger when he first turned onto Olive Street from 37<sup>th</sup>. The Charger drove northbound on Olive Street from where it had been parked and continued past him and he did not see this vehicle turn off.

While detectives were still at the original scene, Officers were dispatched to the area of 45<sup>th</sup> Street and Olive Street Kansas City, Jackson County, Missouri on a reported party armed call for service. While en route to the area, officers received information the armed party was a black male with long dreads, waiving a gun around and attempting to open front doors on nearby residences. Upon arrival, officers observed a black male matching the description provided by dispatch standing in the middle of the intersection of 45<sup>th</sup> Street and Olive Street, Officers conducted a pedestrian check on the male (identified as **KEVIN RANDOLPH**) and detained him without incident. **RANDOLPH** advised officers he had a firearm in his pants. Officers removed a silver/black Smith & Wesson SD40 VE, .40 caliber semi-automatic handgun (serial # FBX4960) from **RANDOLPH's** groin area. The firearm was loaded with twelve live rounds bearing the head stamp "BLAZER 40 S&W", the same head stamp and caliber as the shell casings located at 3646 Olive Street. After a comparison of the firearm recovered from **RANDOLPH** and the bullet fragments and shell casings located at 3646 Olive Street was completed it was determined the bullet fragments and shell casings came from the firearm in **RANDOLPH's** possession at the time of the unrelated arrest.

The day after the incident, detectives were made aware of a video posted on Facebook. In the video, Other #1 stated a man told him he was going to kill someone and then went and killed someone. Detectives viewed video surveillance provided by the Conoco gas station located at 3500 Prospect Ave, Kansas City, Missouri. In the video, detectives observed Other #1 interacting with a man fitting the description provided for **Randolph** and the suspect vehicle, a dark red or burnt orange Charger. The dealer tag (D6705 MO) attached to the rear of the Charger the suspect was driving was located on LPR in the area of the homicide just prior to the homicide. At the time the license plate was read the Dodge was traveling northbound on Prospect (towards the general direction of the crime scene).

A warrant is requested for **RANDOLPH** due to the Aggravated Assault after pointing the firearm at Witness #1/Victim #2 while demanding money (Attempt Armed Robbery) from the victims and subsequently shooting and killing victim #1 in the process. After the homicide, **RANDOLPH** continued to endanger society by going door to door while concealing a firearm even though he is a felon and his right to possess a firearm has been revoked. **RANDOPLH** is currently being held in Jackson County Detention for Unlawful Possession of a Firearm.

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**RANDOLPH** was found guilty on 03-09-2018 in the Circuit Court of Jackson County, Missouri for Possession of a Controlled Substance. On 04-03-2020, the Circuit Court of Clay County, Missouri convicted **RANDOLPH** of third degree Assault.

Printed Name	Detective Alexis Vega #5528	Signature /s/Detective Alexis Vega #5528	
The Court find	s probable cause and directs the issue	ance of a warrant this day of	
		ludge	
	Circuit Court of	County, State of Missouri.	