


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	21-050212
PROSECUTOR NO. :	095465755
OCN:	QO006365

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
LEONZO HARVEY JR)	
8724 Bannister Rd)	CASE NO. 2116-CR
Kansas City, MO 64134)	DIVISION
DOB: 08/06/2001)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205299.1)

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 E felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 7, 2021, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a black and silver handgun, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range punishment for a class E 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 four (4) 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

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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/ J. Timothy Yasso
J. Timothy Yasso (#59342)
Assistant Prosecuting Attorney
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Independence, MO 64050
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WITNESSES:

1. [REDACTED] E 12th St, Floor 11, Kansas City, MO 64106
2. PO Gabriel Coale, 223 N. Memorial Drive, Independence, MO 64050
3. DET Tyler Duke, 223 N. Memorial Drive, Independence, MO 64050
4. PO Harold Echols, 223 N. Memorial Drive, Independence, MO 64050
5. [REDACTED] St, Floor 11, Kansas City, MO 64106
6. PO Christopher Stewart, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 8/8/2021

Report #: 2021-50212

I, Gabriel Coale, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 8/7/2021, at 1745, Leonzo HARVEY, JR., (Race- black, Sex- male, DOB- 08/06/2001, Address-8724 E Bannister Ter Kansas City, MO 64134, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 08/07/2021, at around 1745 hours, Independence Police Officers were requested to respond to a report of an armed disturbance at the Independence Center Mall, 18801 E 39th St S, Independence, Jackson County, Missouri, 64057.

Responding Independence Police Officers were advised by mall security that an active physical altercation was underway between two male subjects, one of which was armed with a gun. As the Police Officers arrived at the location the subjects had separated.

While conducting an area check for involved subjects a passerby advised Independence Police Officer Echols of a vehicle containing involved subjects. Independence Police Officer C. Stewart subsequently conducted a "High Risk" car stop on said vehicle and detained all occupants. The owner of the vehicle, [REDACTED] informed Officer Echols that as he and his son (*juvenile*) were leaving the mall they were approached by a black male, later identified as the Defendant. The Defendant told [REDACTED] that there was a fight in the mall and requested a ride away from the area. [REDACTED] obliged and provided a ride to the Defendant.

Officer Echols noted security footage from the mall viewed by Officers shows the Defendant hide a gun under a clothing display in Dillard's, later return and get the gun, and then get in the vehicle with [REDACTED]. The Defendant's companion, [REDACTED] had also got into [REDACTED] vehicle and was an occupant during Officer Stewart's stop. During the stop, Officer Echols noted in plain view in the rear seat center console, a tan Glock 19x, 9mm semi-automatic gun, bearing serial number BSPM569, was observed. This firearm was recovered containing one round chambered and 31 bullets within the extended magazine. Also later recovered from the vehicle, in a brief case in the back seat, was a black and silver Springfield Armory, 45 caliber semi-automatic handgun, bearing serial number XS500240. This firearm was recovered with one round chambered and three bullets in the magazine. A check of this firearm revealed it to be a confirmed reported stolen out of Liberty, Missouri.

The reported victim(s), [REDACTED] and his companion [REDACTED], were contacted by Officer Echols. Mr. [REDACTED] stated a disturbance had started after the Defendant became upset about [REDACTED], and [REDACTED], apparently cutting in line to pay for merchandise. Officer Echols observed a brief recording of the incident on [REDACTED] phone which showed the Defendant, and [REDACTED], physically charging [REDACTED] demanding that they go out front to fight. [REDACTED] stated she was then struck on the head by [REDACTED], and both fell to the ground fighting. Officer Echols did observe a small laceration above [REDACTED] right eye.

While on the ground, [REDACTED] stated the Defendant began to strike her about the body with a closed fist. Mr. [REDACTED] stated he then attempted to pull the Defendant away from [REDACTED] and the two of them began to fight. [REDACTED] stated that during the altercation between he and the Defendant a gun fell to the floor that belonged to the Defendant. [REDACTED] stated the two then began to fight over the gun. [REDACTED] stated at one point the gun was pointed at his chest during said altercation. [REDACTED] stated he had his finger between the trigger and trigger guard to keep the gun from being fired. [REDACTED] stated the Defendant was actively trying to pull

the trigger of the gun to fire it [REDACTED] stated during this fight the Defendant ultimately gained control of the gun. [REDACTED] also stated the during the altercation that [REDACTED] brandished the aforementioned Glock firearm and held it while shouting, "I have a gun!". No shots were fired.

Witnesses contacted by Officer Echols, to include off duty Pleasant Valley Police Officer A. Oeth, identified the tan Glock handgun as being possessed by [REDACTED] and the black and silver Springfield handgun as being possessed by the Defendant.

During the on scene initial investigation [REDACTED] told Officer Echols that she was the victim. [REDACTED] told Officer Echols that she was defending herself from being attacked. The Defendant informed Officer Echols that he was simply defending his girl.

An on scene medical evaluation was conducted of [REDACTED] by AMR who informed him that he had a concussion as a result of the contact. [REDACTED] was unsure if he was struck in the head by the Defendant or if he hit his head falling to the ground; however, was sure the injury was obtained as a result of the confrontation. [REDACTED] refused transportation by AMR and stated would self-transport for further evaluation.

Both [REDACTED] and the Defendant refused to provide a statement to Independence Police Investigators regarding this incident.

Detective Gabriel Coale #1353

/s/ Gabriel Coale

Print Name

Signature