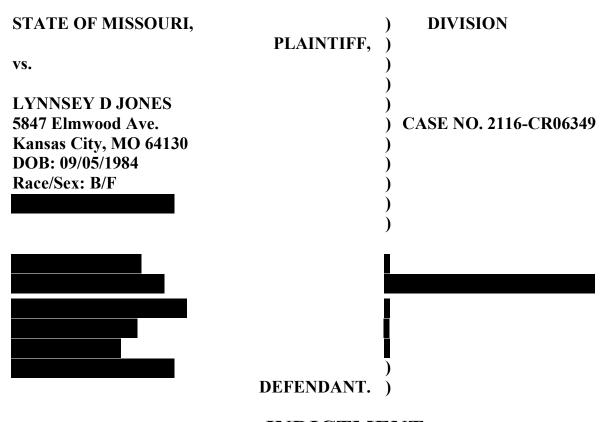
IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT KANSAS CITY

POLICE NO.:	KC19079921
PROSECUTOR NO.:	095455602
OCN:	HR007320



<u>INDICTMENT</u>

In the Circuit Court of Jackson County, Missouri, at Kansas City, September Term, 2019. In Division Number 7 thereof, designated by the rules of said Court as Criminal Division A.

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 October 17, 2019, in the County of Jackson, State of Missouri, the defendants after deliberation, knowingly caused the death of Larona T Jones by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life

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imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 October 17, 2019, in the County of Jackson, State of Missouri, the defendants committed the felony of murder in first degree charged in Count One, 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.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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.

Count III. Murder 1st Degree (565.020-001Y19840903.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 October 17, 2019, in the County of Jackson, State of Missouri, the defendants after deliberation, knowingly caused the death of Brady Jones by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

Count IV. Armed Criminal Action (571.015-001Y19755299.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 October 17, 2019, in the County of Jackson, State of Missouri, the defendants committed the felony of murder in first degree charged in Count Three, 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.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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.

Count V. Murder 1st Degree (565.020-001Y19840903.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 October 17, 2019, in the County of Jackson, State of Missouri, the defendants after deliberation, knowingly caused the death of Larry T Barnes Jr by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

Count VI. Armed Criminal Action (571.015-001Y19755299.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 October 17, 2019, in the County of Jackson, State of Missouri, the defendants committed the felony of murder in first degree charged in Count Five, 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.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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.

Wherefore this Indictment supersedes any Complaint, Information, or Indictment previously filed in the Associate Circuit Court.

A TRUE BILL	
FOREPERSON	
	JEAN PETERS BAKER PROSECUTING ATTORNEY FOR THE COUNTY OF JACKSON, STATE OF MISSOURI, by
Received this day of	
SUMMONS TO ISSUE. BOND TO RICCONDITION	EMAIN AS PREVIOUSLY SET. SPECIAL IS SHALL REMAIN IN EFFECT.
☐ WARRANT TO ISSUE. BOND SET A	AS FOLLOWS: \$
CIRCUIT COURT JUDGE	
WITNESSES: 1. Bonita Y. Cannon, 1125 Locust, K 4. DET Jason C. Findley, 1125 Locust, Ka	· · · · · · · · · · · · · · · · · · ·
5.	
Heather D. Leslie, 1125 Locust, K 11. DET Sean P. Martin, 1125 Locust, Kan	

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12.

- 14. DET James H. Price, 1125 Locust, Kansas City, MO 64106
- 15. SGT Richard D. Sharp, 1125 Locust, Kansas City, MO 64106

16. **64106**

- 17. DET Timothy R. Taylor, 1125 Locust, Kansas City, MO 64106
- 18. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 10-18-2019		CRN: 19-079921
I, Detective Bonita Cannon, #4585, Ka	ansas City Missouri Pol	ice Department
		w, state that the facts contained herein are true.
I have probable cause to believe that on	10-17-2019 (Date)	, at 4526 South Benton Avenue in (Address)
Kansas City, <u>Jackson</u> (County)	Missouri Lynnsey D	Name of Offender(s))
B/F 09-05-1984 (Description of Identity	<i>y</i>)	committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 10-17-2019, at 2053 hours, Officers of the Kansas City, Missouri Police Department were on patrol in the area of 45th and South Benton Avenue, when they heard the sound of gunshots. As the officers were driving in their marked patrol vehicle, they observed a female, who appeared to have a rifle in her hands and male walking from 4526 South Benton Ave. The female got into a black sedan and the male ran from the scene. The female, who was later identified as Lynnsey **Jones** (b/f, 09/05/1984); was taken into custody without incident. An Olympic Arms, MFR 5.56, was located and recovered from inside of the Chevrolet Impala, that officers observed **Jones** entering on the passenger side. An additional Officer pursued the male suspect, who was later identified as Victor Sykes (b/m, 11/10/1975). Sykes was taken into custody after a short foot pursuit in the rear of 4542 Chestnut. Sykes was observed wearing brown cloth gloves and had what appeared to be blood and a laceration on his left hand and wrist. Sykes clothing had what appeared to be dirt on his gloves and pants.

As both suspects were taken into custody officers observed a male victim lying in the street with no apparent signs of life in front of a maroon SUV at 4530 South Benton Avenue. Rifle shell casings were recovered from near the victim. Officers noticed the front door to 4526 South Benton Avenue to be ajar, and a party down inside. Officers entered 4526 South Benton Avenue to render aid to the second victim, who was obviously deceased from an apparent head injury. It was at that time they also observed a third victim in the residence also obviously deceased from an injury to her head.

A witness was identified at the scene and stated he heard the gunshots and went outside of his residence. The witness stated upon doing so he observed an unknown male on top of the male victim striking him with his fist. The witness stated he observed the female suspect approaching, when the male suspect, later identified as Sykes, yelled "Shoot him baby, shoot him." The witness stated he then observed the female suspect shoot the male victim several times as he was on the ground. The witness stated the same male that beat the male victim and told the female suspect to shoot, was the same male that ran from the officers.

The crime scene, at 4526 South Benton Avenue was processed with numerous 5.56 caliber spent shell casings recovered.

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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 the recent incident

and her recent conduct the case Detective believes the offender is a danger to herself and the public.