

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

POLICE NO. :	KC22014944
PROSECUTOR NO. :	095468583
OCN:	HS032051

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
BRANDON K BOWMAN)	
3019 Montgall Ave., Apt D)	CASE NO. 2216-CR
Kansas City, MO 64128)	DIVISION
DOB: 07/10/2000)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

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 March 6, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Solana Sagun caused the death of Solana Sagun by shooting her and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), RSMo, it will be based on the death of Solana Sagun as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030(9), RSMo, committed by defendant.

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.

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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 March 6, 2022, in the County of 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 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 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.

Count III. Assault 1st Degree Or Attempt (565.050-002Y20201305.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 6, 2022, in the County of Jackson, State of Missouri, the defendant shot [REDACTED], and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. 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 March 6, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a 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 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.

Count V. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class A felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about March 6, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor

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vehicle, a Jeep Laredo and as a result of the above described conduct, Solana Sagun suffered injury or death.

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 VI. 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 March 6, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon by, with and through, the knowing use, assistance and aid of a 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 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.

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.

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JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Daniel Portnoy
Daniel Portnoy (#62186)
Assistant Prosecuting Attorney
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WITNESSES:

1. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03-06-2022

CRN: KC22-014944

I, Detective Mary Kincheloe #5063
(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 03-06-2022, at 3019 Montgall in
(Date) (Address)

Kansas City, Jackson Missouri Bowman, Brandon K
(County) (Name of Offender(s))

B/M, 07-10-2000, 5'03", 118 lbs, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 03-06-2022, at 1357 hours, Officers of the Kansas City Missouri Police Department were dispatched on a shotspotter call in the area of E. 31st and Prospect Avenue. At 1359 hours, Officers were also dispatched to E. 27th and Brooklyn Avenue on a reported shooting.

The reporting party, and living victim, [REDACTED], advised the 911 dispatcher she and her friend had been shot in the area of 29th and Montgall by a person named "Brandon."

Upon Officers arrival to E. 27th and Brooklyn, two female victims were located inside a gray Jeep Loreda. [REDACTED] was the driver and an unknown unresponsive female was in the passenger seat. [REDACTED] was transported to St. Luke's hospital in stable condition while the passenger was transported to Truman Medical Center and later confirmed deceased. The victim was identified as Sagun, Solana B/F 03-21-2000. There were apparent defects consistent with that of bullet holes in the passenger door panel, door frame and side mirror. The passenger window was observed to be shattered inward with glass fragments on the passenger seat and floorboard.

[REDACTED] advised she took the Sagun to the area of E. 29th and Montgall Avenue in an attempt to get her phone charger back from "Brandon." [REDACTED] said the Sagun and "Brandon" had been speaking with one another for a few weeks over the phone prior to having their first date on the previous night. [REDACTED] said "Brandon" had also stolen the Sagun's cell phone, but the Sagun located it at E. 27th and Prospect at the liquor store. [REDACTED] said the Sagun wanted her phone charger as well and therefore they drove to the area of E. 29th Street and Montgall looking for "Brandon's" newer model, black, Chevy Malibu. [REDACTED] advised they located the vehicle the Sagun identified as "Brandon's." At that time, a person the Sagun recognized to be "Brandon" came out of the house and approached the passenger side of [REDACTED]'s vehicle. [REDACTED] said the deceased told him she wanted her phone charger and told "Brandon" she was not afraid of the gun he was pointing at her. [REDACTED] said the male she referred to as "Brandon" began firing at her vehicle and she fled the scene. [REDACTED] had not met "Brandon" prior to this encounter.

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Officers in the area of E. 29th and Prospect Avenue began canvassing the area associated with the shotspotter call and looking for shell casings/black Chevy Malibu based off the information the victim had provided. The Genetec cameras were searched in reverse focusing on the where the gray Jeep Loreda had come from prior to arriving at E. 27th and Brooklyn Avenue after the shooting. A gray Jeep similar in appearance to the victim's vehicle was located at 1355 hours north on Montgall from E. 31st Street.

Officers canvassed the alleyway behind the apartments located at E. 31 Street and Montgall Avenue. Officers located a black Chevy Malibu with a MO license plate of CU7B5R. A computer check of the license plate revealed it to belong to Brandon Bowman with a registration to 3019 Montgall Avenue #D. Officers attempted to conduct a residence check, however, prior to doing so, observed multiple shell casings on the sidewalk in front of 3019 Montgall Avenue. The PA system was utilized and "Brandon" was requested to come out of his home to which he complied.

A person who was later identified as **Bowman, Brandon B/M 07-10-2000** was taken into custody without incident.

A review of surveillance video captured Bowman exiting the front door of his apartment, arms extended with a black handgun pointed in the direction of the roadway. One gunshot is heard. The rest of the incident is out of camera view, however, Bowman is then seen within a few minutes returning to the front entrance of his residence still armed with a black firearm in his right hand pointed in a downward direction next to his right leg.

The crime scene revealed one spent shell casing on the front porch and three spent shell casings on the sidewalk in front of 3019 Montgall.

A [REDACTED] advised after hearing two gunshots, Bowman entered their residence and went upstairs. Bowman then exited the residence and moved his vehicle to the parking spot where police located it. Bowman then came back inside until Officers requested him to exit his residence.

[REDACTED] was presented with (6) individual photographs and viewed them one at a time. The males in the photograph had similar characteristics in appearance. [REDACTED] identified the person the sixth photograph she was presented with as the person who shot at her vehicle, wounding her and killing the deceased victim.

The body exam conducted at the Jackson County Medical Examiner's office revealed the victim to have a defect on the right chest, defect on the left shoulder and a defect in the right leg.

On 03-07-2022 at 1127 hours, Bowman was escorted to an interview located at East Patrol Division Station. After being read the Miranda Warning, Bowman was asked to provide basic identifying information. Bowman provided a statement regarding his involvement in the homicide that occurred on 03-06-2022. Bowman said he met up with Sagun on 03-05-2022 after talking for a few weeks on Facebook with her. Bowman said he left her at a hotel on 03-06-2022 and she was still asleep. He then began getting messages from Sagun accusing him of stealing her phone. Bowman initially denied ever having her phone. He said he was called down from upstairs of his residence by his mother who said somebody was ramming his car. Bowman said he confronted the people in the vehicle armed with a BB gun in his right front pocket. He said he knew both the occupants of the front; the

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driver being [redacted] the passenger being Sagun. Bowman said there was a third, unknown male in the backseat. Bowman said Sagun and [redacted] had been threatening him verbally over FB messenger prior to their arrival. Bowman said Sagun told him she wasn't afraid of his gun and then raised a black handgun and fired through the closed passenger window of the Jeep at him. He then returned fire with his BB gun and the vehicle fled the scene. After being confronted with video surveillance information which contradicted his statement, Bowman changed his story and advised he was carrying a 9mm. Bowman said he felt threatened by them and did not want them to make it to his residence. Bowman eventually also admitted to accidentally having the victim's phone in his possession and dropping it off at the liquor store at E. 27th and Prospect Avenue where the victim is captured on video collecting it minutes prior to the shooting. Bowman said he gave the gun to a neighbor.

Printed Name Detective Mary Kincheloe #5063 Signature /s/ Det. Mary Kincheloe #5063

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

Judge

Circuit Court of _____ County, State of Missouri.