

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

POLICE NO. :	KC22019527
PROSECUTOR NO. :	095468981
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
GERALD R. ROBINSON II	)	
2036 Van Brunt Blvd.	)	CASE NO. 2216-CR
Kansas City, MO 64127	)	DIVISION
DOB: 10/08/1998	)	
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 March 25, 2022, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Anthony R Villarreal by shooting him, and that the defendant was eighteen years of age or older at the time of the offense.

The range of punishment for 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 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

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571.015.1, RSMo, in that on or about March 25, 2022, in the County of Jackson, State of Missouri, the defendant committed the 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.

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.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St.
Floor 7M
Kansas City, MO 64106
(816) 881-3597
KNBryant@jacksongov.org

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WITNESSES:

1. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
2. [REDACTED]
64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO
64106
5. [REDACTED]. Office, 415 E 12th St, Floor 11, Kansas City, MO
64106
6. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
7. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
8. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
9. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106
10. Anthony R Villarreal, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City,
MO 64106
11. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106
12. PO Bryan A. Young, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03/31/2022

CRN: KC22019527

I, Detective Danny Thomas #4933
(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 03/25/2022, at 5100 E. 24th Street in
(Date) (Address)

Kansas City, Jackson Missouri Gerald R. Robinson
(County) (Name of Offender(s))

B/M, 10/08/1998 committed one or more criminal offense(s).
(Description of Identity)

Murder
ACA

The facts supporting this belief are as follows:

On 03/25/2022 at approximately 1557 hours, Officers of the Kansas City, Missouri Police Department were dispatched to the area of E. 24th Street and Quincy Avenue, Kansas City, Jackson County, Missouri on a reported shooting.

Upon arrival officers located a Hispanic male (victim) lying in the grass on the west side of 5100 E 24th Street. The victim was suffering from numerous gunshot wounds. He was transported to an area hospital where he died from his injuries.

Detectives obtained surveillance video from the area which captured the incident. The video depicts the victim walking southbound on Denver, north of 24th Street. A red/maroon colored vehicle with tape over the driver side rear wing window, drives past the victim southbound. Upon seeing the vehicle the victim turns around and runs northbound. The vehicle continues to the intersection of 24th Street and Denver, where it makes a U-turn and drives northbound on Denver. As the vehicle nears 2330 Denver an individual (suspect) exits the vehicle and runs westbound after the victim.

The victim jumps the fence onto the property located at 5100 E. 24th Street, followed by the suspect. The suspect catches up to the victim and shoots him numerous times. After which he turns and runs back eastbound presumably to the suspect vehicle.

During the course of the investigation detectives searched Genetec City Cameras in the area and located the suspect vehicle, which was later identified as 2010 Chevrolet Malibu at 15:59:52 in the intersection of 23rd and Hardesty.

In addition, ALPR cameras located at 23rd and Hardesty, capture the Chevrolet's license plate at 15:59:52. The plate on the Chevrolet is GH2 V8W Missouri. The license plate was checked through the Missouri Department

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of Revenue and it responded to a Chevrolet registered to Gerald Robinson. The suspect seen in the surveillance video and photographs of Gerald Robinson appear to be the same person. The surveillance video was viewed by Robinson's Probation Officer who stated he was 90% sure the person depicted in the video was Gerald Robinson, he stated he meets with Robinson every two weeks. He provided Robinson's address as 2036 Van Brunt Boulevard and his phone number as 816-588-2704.

On 10/11/2021 at 1738 hours, Gerald Robinson, B/M, 10/08/1998, was involved in an accident reported to the Kansas City Missouri Police Department. In this report he was driving the Chevrolet bearing Missouri License Plate GH2 V8W. In addition he provided his address as 2036 Van Brunt Boulevard.

On 03/26/2022, officers observed the aforementioned vehicle parked in the driveway of 2036 Van Brunt Boulevard. Upon seeing the vehicle the officers drove around the block, however when they returned the vehicle was gone. The vehicle was located a short time later, unoccupied in the alleyway near 22nd and Denver Avenue. The vehicle did not have a front license plate and was towed to the vehicle processing facility (VPF/7760 E. Front Street).

A search warrant was executed on the Chevrolet Malibu during which a pair of black Puma sweatpants were located in the vehicle. The sweatpants appear to be the same pants as worn by the suspect in surveillance video.

Pieces of US mail and a Missouri Driver's License were also located in the vehicle to Gerald Robinson, 2036 Van Brunt.

A search warrant was executed on the residence, 2036 Van Brunt Boulevard. During the search a Puma sweatshirt which looks to be the same as depicted in surveillance video was located in the residence.

On 03/31/2022, Gerald Robinson was arrested. At the time of his arrest he was wearing a pair of Nike sneakers that resemble the shoes worn by the suspect in the surveillance video.

Robinson was transported to police headquarters and questioned. During questioning he verified his address (2036 Van Brunt Boulevard), his cellphone number (816-588-2704) and his vehicle (2010 red Chevrolet Malibu).

Still photographs taken from surveillance video of the suspect were shown to Robinson, he stated the person looked familiar. He was asked if he was the person depicted in the photo and he said, "No."

After further questioning Robinson stated he didn't want to talk anymore.

Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

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

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Judge

Circuit Court of _____ County, State of Missouri.