

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

<b>POLICE NO. :</b>	KC22024574
<b>PROSECUTOR NO. :</b>	095469254
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JUSTIN J. OWENS-HARRELL</b>	)	
<b>Unknown</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64106</b>	)	<b>DIVISION</b>
<b>DOB: 12/20/1990</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Involuntary Manslaughter 1st Degree (565.024-001Y20200999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the **class C felony of involuntary manslaughter in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 15, 2022, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Skyler J Smith by shooting him. Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment under Sections 558.016 and 557.036, RSMo, in that he has been found guilty of two or more felonies committed at different times. The felonies are as follows:

1. On or about May 14, 2012, defendant was found guilty of the felonies of robbery in the second degree and armed criminal action in the Circuit Court of Jackson County, Missouri.
2. On or about February 8, 2008, defendant was found guilty of the felonies of robbery in the second degree and felonious restraint in the Circuit Court of Jackson County, Missouri.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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 through the commission of

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the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

**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 571.015.2, RSMo, in that on or about April 15, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of involuntary manslaughter charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of involuntary manslaughter by, with and through, the knowing use, assistance and aid of a firearm.

Defendant is punishable by sentence to an extended term of imprisonment under Sections 571.015 and 557.036, RSMo, in that he has been previously found guilty of armed criminal action. The previous conviction is as follows:

1. On or about May 14, 2012, in the Circuit Court of Jackson County, Missouri the defendant was convicted of the offense of armed criminal action..

Defendant is punishable by sentence to an extended term of imprisonment under Sections 571.015 and 557.036, RSMo, in that he has been previously convicted of a felony and therefore, it is unlawful for the defendant to possess a firearm pursuant to Section 571.070, RSMo. The previous felony convictions are as follows:

1. On or about May 14, 2012, defendant was found guilty of the felonies of robbery in the second degree and armed criminal action in the Circuit Court of Jackson County, Missouri.
2. On or about February 8, 2008, defendant was found guilty of the felonies of robbery in the second degree and felonious restraint in the Circuit Court of Jackson County, Missouri.

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)

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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. Unlawful Possession Of A Firearm (571.070-001Y20205299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about April 15, 2022, in the County of Jackson, State of Missouri, the defendant knowingly possessed a handgun, a firearm, and on or about May 14, 2012, defendant was found guilty of the felonies of robbery in the second degree and armed criminal action in the Circuit Court of Jackson County, Missouri.

The range punishment for a class D 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 seven (7) 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 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/ Kelly Collins*  
Kelly Collins (#68006)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

1. PO JD Ali, 1125 Locust, Kansas City, MO 64106
2. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
3. PO Joseph F. Collier, 1125 Locust, Kansas City, MO 64106

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4. [REDACTED]  
[REDACTED] E 12th St, Floor 11, Kansas City, MO 64106
6. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
7. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
8. Skyler J Smith, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
9. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 04-18-2022

CRN: 22-024574

I, Det. Bonita Cannon, #4585, Kansas City, Missouri Police Department  
(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 04-15-2022, at 3800 E. Gregory Boulevard in  
(Date) (Address)

Kansas City, Jackson Missouri Justin J. Owens-Harrell  
(County) (Name of Offender(s))

DOB: 12-20-1990 / [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 04-15-2022 officers of the Kansas City Missouri Police Department were dispatched to 3800 E. Gregory Boulevard, Jackson County, Missouri on a reported shooting. Upon their arrival officers located a male suffering from an apparent gunshot wound to his neck.

The male victim was transported to Research Medical Center, 2316 E. Meyer Boulevard, via KCFD EMS. The male victim was later pronounced deceased as a result of his injuries. The Jackson County Medical Examiner ruled the victim's death a homicide.

[REDACTED] stated she is the victim's girlfriend. They were at the gas station during which time their vehicle was having mechanical issues and the victim misplaced his cell phone. She stated she and the victim got upset with the situation. At some point the victim went in and out of the store. She further stated she wasn't paying attention when she heard a gunshot. She looked up and saw the victim going into the business. [REDACTED] stated she observed two black males (one in red clothing and the other a dark skinned male with dreads wearing a grey jacket) pushing a black vehicle backwards up to the gas pumps. That vehicle struck the rear of her vehicle.

Detectives reviewed video surveillance observing the following: It should be noted the time stamp on the video is one hour ahead of real-time.

The suspect and victim as well as [REDACTED] were inside of the business at 1632 hours. There does not appear to be any interaction between the victim and the suspect.

-1633:52 the suspect exits business.

-1634:24 the victim exits the business.

-1646:56 a white Nissan backs into the lot near the black Dodge Charger. An unknown male exits the vehicle and approaches the black Dodge Charger.

-1647:28 the victim walks past the suspect and suspect vehicle as the suspect is standing outside of the black Dodge Charger.

-1647:53 the suspect approaches the victim armed with a handgun. [REDACTED] appears to be trying to keep the victim and suspect separate.

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- 1648:08 a patron inside attempted to leave the business when the victim and suspect are struggling just outside of the door to the business.
- 1648:16 the shooting happens ( [REDACTED] turns and ducks, patrons inside of the business ducks and hides). The victim enters the store.
- 1649:20 the Dodge Charger is being pushed backwards and appears to strike the [REDACTED] black Hyundai.
- 1648:40 the victim is standing in the doorway of the business.
- 1649:56 the suspect is inside of the business paying for gas before leaving the business.
- 1650:23 the victim collapses the first time.
- 1651 victim approaches door, he appears to be struggling to remain standing.
- 1651 the Dodge Charger leaves the via the west side of the business then south on Cleveland. The rear license plate of the Dodge Charger is noted to be GE7J6W. The vehicle continues southbound on Cleveland crossing Gregory Boulevard out of camera view.
- 1652:04 the victim collapses inside of the store for the second time.

A computer check of the displayed license plate on the Dodge Charger GE7J6W revealed it to be registered to a female in Grandview Missouri. A computer check of the DOR address revealed the name Justin J Owens-Harrell (B/M 12-20-1990). Owens-Harrell is similar in appearance to the male in the surveillance video. He fits the description of the suspect from the witnesses. A computer check of the department database revealed 816-437-4145 Subject Telephone Number provided to police by Owens-Harrell in a prior contact with police.

[REDACTED] he had just worked on the suspect vehicle. [REDACTED] wanted to go to the store, the suspect offered to take him. Upon their arrival both went into the business. [REDACTED] stated the victim walked past them with his hand in his pocket, uttering, "What's up nigga." [REDACTED] stated the suspect approached the victim with a gun; then "pistol whipped" the victim as the suspect and victim struggled. He further stated the victim was trying to grab the suspect's wrist.

[REDACTED] stated he wasn't trying to get involved, however the driver of the white Nissan tried to separate the victim and the suspect. [REDACTED] stated he heard the sound of a single gunshot and the bullet ricocheted off of a propane tank. He stated he believed the bullet almost hit him.

[REDACTED] stated he and the suspect got into the Dodge Charger attempting to leave, however the vehicle wouldn't start, they were out of gas. He and the suspect pushed the vehicle back to pump #2. He further stated the suspect whom he only knows as "Dirt" went back into the business to pay for \$10 worth of gas. [REDACTED] stated he told the suspect to take him home. Once he got home he realized someone was hurt and returned to the business. [REDACTED] he doesn't know how to get ahold of the suspect, nor has he heard from him.

[REDACTED] described the suspect as tall, skinny, dreads, dark complexion and a gold tooth. He was shown a lineup containing Owens-Harrell. [REDACTED] two of the photographs resembled the suspect (the photograph of Owens-Harrell and a second subject unrelated to this investigation).

[REDACTED] contacted detectives and wanted to provide a statement. TH responded to Police Headquarters, 1125 Locust. He provided a formal statement.

[REDACTED] stated the suspect is his son, Justin Owens-Harrell. He stated he was headed home from work, saw his son at the address (3800 E. Gregory) and pulled into the parking lot. He then observed the victim walk past

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his son. The victim leaned against the building with his hands in his pocket uttering, "Yeah." [redacted] said his son was uttering the same thing. His son told [redacted] to get his "boy." He then saw his son with a handgun, to which he yelled, "You better not," to his son. His son approached the victim, pointing the gun at the victim. [redacted] stated he tried to intervene all while telling his son to stop. [redacted] stated his son and the victim struggled during which time his son shot the victim. [redacted] stated it all happened so fast.

[redacted] stated his son had told him he was out of gas, but he wasn't allowing his son to leave with him. [redacted] stated he left and went home. He has not heard from his son since the shooting occurred. [redacted] identified a single photograph of his son/suspect. He also identified those pictured in a screenshot from the video surveillance. The screenshot was of: Justin Owens-Harrell, [redacted] and the Victim.

On 04-18-2022 at 1334 hours Owens-Harrell was taken into custody at 10318 E. 63rd Street. He was wearing a grey hooded sweatshirt similar to the one her wore at the time of the homicide.

Owens-Harrell was transported to Police Headquarters, 1125 Locust on an investigative hold for Homicide. He was advised of his Miranda Rights at 1501 hours. Owens-Harrell asked was he under arrest, to which he was told "Yes." He asked for what and was told he was on an 24 hour investigative hold. When shown a screenshot from the surveillance video of him standing next to the black Dodge Charger Owens-Harrell denied he was in the photograph. Owens-Harrell was photographed in the grey hooded sweatshirt.

Owens-Harrell was informed detectives were investigating a homicide and was asked about the previously shown photograph. Owens-Harrell then stated, "Lawyer." His interview was ended.

The case Detective is requesting an arrest warrant in lieu of a summons for the listed offender as the circumstances of the crime was violent in nature. "Owens-Harrell" has had prior contacts with law enforcement Officers. In light of the recent incident and his recent conduct the case Detective believes the offender is a danger to himself and the public.

Printed Name Det. Bonita Cannon, #4585 Signature /s/Det. Bonita Cannon, #4585

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.