

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

POLICE NO. :	KC23045919
PROSECUTOR NO. :	095475417
OCN:	HU013986

STATE OF MISSOURI,	)	
	)	PLAINTIFF,
vs.	)	
	)	
DYNELL R JONES,	)	
6919 SPRUCE AVE	)	CASE NO. 2316-CR
Kansas City, MO 64132	)	DIVISION
DOB: [REDACTED]	)	
Race/Sex: B/M	)	
S.S.N.: [REDACTED]	)	
	)	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 July 13, 2023, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Confidential Victim, caused the death of Confidential Victim by shooting him, and defendant is further given notice that should the State of Missouri submit murder in the second degree – felony murder, under Section 565.021.1(2), RSMo., it will be based on the death of Confidential Victim as a result of the class B felony of unlawful use of a weapon under Section 571.030.1(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.

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 July 13, 2023, 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)

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 B Felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 13, 2023, at or about 4201 Main Street, Kansas City, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a black GMC Yukon.

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 July 13, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, 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.

Count V. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

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 July 13, 2023, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 9mm handgun, a firearm, and on

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May 4, 2023, in Case Number 21BU-00886-01, the defendant was convicted of the felony of unlawful possession of a firearm in the Circuit Court of Buchanan 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/ John G. Gromowsky

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WITNESSES:

The State's witnesses as of 8/9/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORMDate: 07-31-2023CRN: 23-045919

I, [REDACTED], 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 07-13-2023, at [REDACTED] in
 (Date) (Address)

Kansas City, Jackson Missouri Dynell R. Jones
 (County) (Name of Offender(s))

B/M [REDACTED] committed one or more criminal offense(s).
 (Description of Identity)

The facts supporting this belief are as follows:

On 07-13-2023 at 1731 hours, officers were flagged down by a black female driving a black GMC at Linwood Blvd and Troost. The driver reported her passenger (victim) was shot in the parking lot of 4201 Main Street, Kansas City, Jackson County, Missouri. There were several calls for service on the sounds of shots in the area. The victim was transported to an area hospital and taken into surgery. He ultimately died as a result of his injuries. His death was ruled a homicide by the Jackson County Medical Examiner.

Officers responded to the area of 4201 Main and located 2 shell casings on the west side of Walnut St, just north of [REDACTED], Kansas City, Jackson County, Missouri. Miscellaneous items were also observed in the back-parking lot of 4101 Main St.

Witness #1 stated they were southbound on Main Street. She stated the victim told her to "pull up" on the subjects in the parking lot (4201 Main Street). She stated she turned into the parking lot of the Starbucks (4101 Main Street). She then drove over the curb at the victim's insistence and into the parking lot of the Office Depot (4201 Main Street). Witness #1 stated she pulled up and stopped the vehicle near the north east corner of the building. The victim opened the front passenger door, exited the vehicle while yelling at the subjects. Witness #1 stated the victim yelled something to the effect of "I got something for you." Witness #1 stated the victim was reaching for a knife but didn't have it out. She stated she saw one of the subjects with a gun and shouted out to the victim that she had seen a gun. The victim reacted by getting back into her vehicle. She stated the victim closed the door at which time she heard gunfire. She stated there were three black males (one in all red, one in all white and an unknown description for the third party)

Witness #1 stated she sped out of the area and observed the victim to be suffering from a gunshot wound to his face. She drove north and flagged down officers on 31st Street. Witness #1 stated the victim never left the opening of the vehicle door and none of the subjects were near the vehicle at the time the victim briefly exited the vehicle.

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Witness #2 was working construction in the area of 41st Street and Main Street on the street car extension. He advised he heard two gunshots coming from the back-parking lot of the Office Depot store. He then observed a black 2008-2012 GMC Yukon with a license plate of [REDACTED] driving at a high rate of speed through the parking lot of the Office Depot store. The SUV then drove northbound on Main Street at a high rate of speed. Witness #2 advised he observed two bullet holes on the driver side of the front windshield, the driver was a black male, long dreadlocks and a black hoodie with the hood over his head.

Witness #3 who was sitting in his vehicle in the parking lot of Office Depot, advised he had just pulled up to the store parking lot and heard "two pops" in the area. He then observed a black Suburban driving erratically through the parking lot.

Detectives obtained video surveillance from Starbucks (4201 Main Street). The video showed the victim and witness (black SUV) northbound on Main Street before turning into the parking lot of the Starbucks at 1725 hours. The video footage further shows the victim vehicle northbound on Main Street at 1727 hours.

Video Surveillance was also recovered from The Art Institute (4218 Walnut). That video showed the following:

Three subjects in the parking lot. A subject in all red (determined to be Dynell Jones B/M [REDACTED]) near the dumpster and then up onto the retaining wall. A subject in all black (determined to be witness #5) approach the subject in all red. Both appear to linger near the bushes (where the shell casings were located). As the victim/witness vehicle come into camera view facing eastbound, the subject in red eventually runs to the east. The subject in all black remains near the bushes. The victim/witness vehicle turns to the north.

On 07-20-2023 Jones was taken into custody and transported to Police Headquarters, 1125 Locust. He was advised of his Miranda Rights. Jones stated he understood his rights. Jones initially denied being present, however provided the following:

He was wearing all black. He was in the rear parking lot of the Office Depot (4201 Main Street) at the trash dumpster. He was with his girlfriend, witness #4, who was wearing all red.

Jones stated he saw the vehicle the victim was in "pull up on them" which he explained to mean drive up near them in an unusual manner which he (Jones) interpreted as threatening. Jones stated he observed the victim, who he knows as "[REDACTED]" get out of the front passenger seat of the vehicle in an aggressive manner shouting something along the lines of "I got something for you" in the direction of witness #5 (a friend of Jones).

Jones observed the victim proceed to strike witness #5 with an unknown object, which caused witness #5, to fall to the ground. Jones then told witness #4 to remain hidden behind the dumpster due to fearing the victim would harm her. Jones stated the victim got back in the front passenger seat of the vehicle, however kept the vehicle's door open.

Jones stated that he took a black handgun from his friend, witness #5, who was planning on using it on the victim if he could get closer to the victim. Jones stated he felt like waiting for the victim to close the distance was too dangerous based on the victim's actions, so he fired twice in the direction of the victim's vehicle in an effort to

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scare off the victim into leaving or to keep him from doing anything else to them. Jones stated he threw the firearm away as he and witness #4 fled the scene.

On 07-21-2023 witness #4 was contacted and responded to Police Headquarters. She stated she was with Jones (Wearing all red) and two others, witness #5 and his girlfriend ("████"), hanging out in the parking lot of 4101 Main Street. At some point they went over to the vacant lot just north of ██████ attempting to locate some stolen property of hers. While doing so they were informed they were at the wrong location, however found what they were looking for close by. Witness #5 was wearing dark colored clothing.

Witness #4 further stated the four of them went to the steps on the east side of the parking lot of 4201 Main Street. At some point ██████" went to the Starbucks and never returned. Witness #5 eventually walked in that direction. She stated by then she and Jones were arguing and she was walking towards the dumpster located in the southeast corner of the same parking lot. Jones was a few feet behind her.

As witness #5 reached the edge of the building, a black SUV approached him. She stated witness #5 yelled for Jones, at which time, Jones told her to hide behind the dumpster. She stated by then Jones has climbed the retaining wall and was near the sidewalk/bushes. She stated she tripped and fell striking her head trying to hide. She further stated she heard gunshots and then silence. Afterwards she heard "witness #5 say "he got shot." Witness #4 stated she asked who was shot to which he told her "████" (victim). She stated she didn't see Jones and was told by witness #5, that Jones was fine.

Witness #4 stated she left the scene with witness #5. She met up with Jones, they changed clothes and was stopped by Police Officers shortly afterwards. During that stop she had on all red and Jones changed into all black clothing. Witness #4 stated prior to being stopped by the officers, Jones told her the truck was driving in her direction. She stated Jones went on to say, witness #4 threw him the gun and to protect her he shot at the truck. She stated she didn't say anything to the officers because she didn't want Jones to be taken away, however this morning he called her from jail and told her he confessed and she should tell detectives the truth.

Witness #5 was contacted and stated he was with (his girlfriend ██████", Jones and witness #4). They were in the area headed to QT (43rd and Main) however, stopped at 4201 Main (behind the business). He stated his girlfriend went to the Starbucks 4101 Main. She was taking too long so he went looking for her.

Witness #5 further stated he was walking back to where Jones and witness #4 were (at the dumpster behind the building at 4201 Main Street), when the victim and an unknown female in a black SUV approached. The victim jumped out and tried to assault him. Witness #5 stated the victim had a hatchet or something like it and tried to hit him with it. Witness #5 stated he ran around the truck, across the parking lot, up the stairs and met up with Jones.

Witness #5 stated witness #4 was still at the dumpster when he and Jones were up on the sidewalk. He also stated when they were up on the sidewalk, Jones fired twice and ran. Witness #5 stated he stayed and helped witness #4 (she had hurt her head falling). He stated he and witness #4 walked to the east, however he left her and went back to look for his girlfriend.

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

The Court finds probable cause and directs the issuance of a warrant this 9th day of August, 2023.



Judge

Circuit Court of Jackson County, State of Missouri.