

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

<b>POLICE NO. :</b>	KC23050860
<b>PROSECUTOR NO. :</b>	095475539
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>BRANDON WELLS</b>	)	
<b>4741 CENTRAL ST, Suite 512</b>	)	<b>CASE NO. 2316-CR03530</b>
<b>Kansas City, MO - 64112</b>	)	<b>DIVISION 29</b>
██████████	)	
<b>Race/Sex: B/M</b>	)	
██████████	)	
	)	<b>DEFENDANT.</b>

**AMENDED COMPLAINT**

**Count I. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y20201004.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class B felony of kidnapping in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about August 1, 2023, defendant unlawfully confined ██████ for a substantial period, without ██████'s consent by handcuffing ██████, for the purpose of terrorizing ██████

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 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 II. Sodomy Or Attempted Sodomy - 1st Degree (566.060-001Y20201199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the felony of sodomy in the first degree, punishable upon conviction under Section 566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo,

in that on or about August 1, 2023, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant knowingly had deviate sexual intercourse [REDACTED], by the use of forcible compulsion.

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

**Count III. Assault- 4th Degree - Pursuant To Subdivision (6) (565.056-009Y20201399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.056, RSMo, committed the **class C misdemeanor of assault in the fourth degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 1, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused physical contact with [REDACTED] knowing that such person would regard such conduct as offensive or provocative.

The range of punishment for a class C misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed fifteen (15) days; by a fine not to exceed seven hundred fifty dollars (\$750); 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.

**Count IV. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y20201004.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class B felony of kidnapping in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about July 9, 2023, defendant unlawfully confined [REDACTED] for a substantial period, without [REDACTED]'s consent by handcuffing [REDACTED], for the purpose of terrorizing [REDACTED]

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 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 V. Rape Or Attempted Rape - 1st Degree (566.030-001Y20201103.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo,

committed the offense of rape in the first degree, punishable upon conviction under Section 566.030, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about July 9, 2023, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED] by the use of forcible compulsion.

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

The facts that form the basis for this information and belief are contained in the previously filed statement(s) of facts, incorporated herein and submitted as a basis upon which this court may find the existence of probable cause.

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Harrison T. Blue*

Harrison T. Blue (#69969)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

The State's witnesses as of 8/23/2023 are included on the "State's Witness List" filed contemporaneously with this Amended Complaint.

**AMENDED  
PROBABLE CAUSE STATEMENT FORM**

Date: 08-23-2023

CRN: 23-050860 / 23-048016

I, Detective Robert Roubal #5075

(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 08-01-23 and 07-09-23, at 907 Benton Blvd. and 6840 E. Front St. in  
(Date) (Address)

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

\_\_\_\_\_ committed one or more criminal offense(s).  
(Description of Identity)

**Kidnapping**  
**Sodomy**  
**Rape**  
**Assault**

The facts supporting this belief are as follows:

**CRN #23-050860**

On 8/1/2023 officers with the Kansas City Missouri Police Department responded to the Missouri Department of Social Security – Clay County in regard to reported sex offense that had occurred in Kansas City, Jackson County, Missouri.

In a statement to detectives Victim #1 stated on 8/1/2023 around 0400 hours she and her boyfriend had got into a verbal altercation and she left their residence. As she walked past a vacant apartment building (901 Benton Blvd, Kansas City, Jackson County, Missouri) the bag she was caring began to rip so she grabbed a new roll-away style recycling bin from in front of the building (901 Benton Blvd) and dropped her property into it. When she reached the area of East 8th Street and Benton Blvd. a security guard (later identified as Brandon Wells) pulled his vehicle towards her stopping her. She described Wells as a large framed African American male, with blonde tipped twists in his hair. She described him wearing an identification patch on his vest that said his last name and another patch that identified him as a “K-9 Unit.” She said as Wells approached her, he said “that’s not yours go put it back.” She said she immediately complied with Wells’ directions and took her clothes out of the recycling bin and took the bin back to the apartment building where she had originally found it. While she was walking the bin back to 901 Benton, Wells drove his patrol car to the address, exited the car and ordered her to put her hand behind her back. Wells told her she was being stopped for trespassing and possessing stolen property. After placing her in handcuffs, Wells lifted up her shirt high enough to expose her breasts, then pulled the front waist band of her pants out far enough that he could see down her pants. After obtaining her personal information, Wells told her he heard something behind the building and needed to put

## PROBABLE CAUSE STATEMENT FORM

CRN 23-050860 / 23-048016

her in his car. She said Wells put her in his vehicle and walked around the corner of the building. When he came back, he got into the car with her. She commented to Wells "I thought you were going to let me go when you came back?" Wells told her he needed to go around to the back because there is some suspicious activity back there. After having her detained for about 15-20 minutes Wells told her to come with him. While Victim #1 was still handcuffed, Wells walked her towards the stairs behind 907 Benton Blvd and to the rear of the building.

Victim #1 stated during the whole encounter she was worried about being kidnapped or human trafficked because of the way Wells was treating her. She said Wells told her "if an African American would've done something like that they would get shot" (referring to her taking the trash can). When she told Wells "it's only a trash can," he said "you think you are going to get away with it without any punishment? There has to be a punishment for everything, and you little white girls think you can get away with anything." Victim #1 said she asked Wells "since you aren't taking me to jail, what's my punishment?" Wells answered her by saying "you're going to fill my needs." She said Wells then unbuttoned his pants exposing his penis to her. Wells then forced her to perform oral sex on him. After performing oral sex on Wells, he spit in her face and told her to "get the hell out of here." While Wells removed the handcuffs and told her "if you tell on me it won't matter because this isn't the first time and you're just another drug addict."

Victim #1 did go to an area hospital on 8/1/2023 but did not stay for a SANE exam after finding out the SANE nurse would have to be called in from home.

On 8/8/2023 a computer search of Missouri DOR was conducted, looking for any vehicle linked to Wells. A white Ford Explorer vehicle bearing a Missouri License LA7X5T, responded back to Wells. A search of that license through the License Plate Reader system revealed Wells' vehicle traveling east bound on Independence Ave from Benton Blvd on 8/1/2023 at 0456 hours.

On 8/9/2023, Victim #1 was presented a photo array of six similar individuals. During that array she identified Wells as the man who assaulted her. When asked how certain she was she said "Absolutely certain".

On 8/9/2023, the reporting detective contacted Other #1, who was found to be the owner of 907 Benton Blvd. He stated his company had recently acquired the property located at 901-907 Benton Blvd. He stated he does not have any active security contract for security patrols and has not given permission to anyone to be on the property during the overnight hours.

On 8/10/2023 I contacted Echo911 (Radio/GPS & CAD provider for U.S. Protective Services) in regard to obtaining records in regard to Wells' activity on 8/1/2023. A formal request was submitted electronically to the Echo911 Admin, and a short time later I was contacted by Other #2 who stated he would be able to provide me with Wells' radio traffic, enforcement activity, and GPS data. The GPS report Echo911 provided was uploaded into Google Earth Pro. Once Wells' locations were uploaded a single position was found behind the 901 Benton Blvd building. The GPS ping from being 901 Benton Blvd. is stamped Time: 2023-08-01T10:52:10Z. I then conducted an internet search utilizing [www.worldtimebuddy.com](http://www.worldtimebuddy.com), after selecting UTC (GMT+0=UTC) and Kansas City Missouri (CDT). The internet search with the preset time offset places Wells being at 901 Benton between 5:30-6:30 am on 8/1/2023. After reviewing the GPS data I contacted Other #2 who stated Wells' locations between 05:30- and 06:30 are all within 1.2-1.8 meters of exact.

## PROBABLE CAUSE STATEMENT FORM

CRN 23-050860 / 23-048016

A review of Wells CAD data from Echo911 revealed him to have stopped Victim #1 at 05:29:11. Wells then updated his CAD as releasing her at 06:01:03m and closing his CAD incident at 06:05:33.

On 8/9/2023 Brandon Wells responded to Police Headquarters to provide a noncustodial statement in regard to this investigation. In his statement to detectives, Wells stated he is an armed uniformed security officer and uses a marked patrol vehicle during the course of his duties. His company is currently assigned to and responsible for the security of the apartment building located at 914 Benton Blvd. Wells stated he is the only employee of U.S. Protective Services who drives the white Ford Explorer SUV bearing Missouri License LA7X5T because, that is the "commander's vehicle." When asked if he worked on the night of July 31st into August 1st, Wells referred to his "CAD" (a cell phone application). When Wells looked for July 31 into August 1, he could not find any assigned shift for that night. When asked if he remembers that night or if anything from that night stands out to him, he stated "no." Once he was asked about Victim #1 specifically, Wells stated he did remember driving past a "homeless" woman (referring to Victim #1) pulling a recycling bin up the street. He then explained that he remembers his encounter with Victim #1 stating that he observed her steal a recycling bin from 914 Benton Blvd, the complex he is responsible for. He said after she stole the bin, he made her put the bin back then "detained her" long enough to get her information. He stated once Victim #1 returned the recycling bin and he obtained her information she promised to never come back to that property again and he released her.

Wells stated he had Victim #1 detained for what he guessed to be roughly ten minutes. When he was presented with the allegations of him pulling her shirt up exposing her chest and pulling her pants out far enough to see down her pants, he just said "no" without showing any change in his demeanor or in his body language. The reporting detective went on to detail Victim #1's account of Wells putting her in his vehicle and driving her behind 907 Benton Blvd, Wells' only response was that he didn't believe 907 Benton was a legitimate address. When asked why Victim #1 would accuse him of assaulting her, Wells said "I'm the person people love to hate. I'm the guy making good detainments that lead to great arrests. I can't help that I'm the one who is out there making a difference." Wells then broke down each charge saying "kidnapping...didn't do; sodomy...didn't do" and continued through the rest of the charges in the same fashion. When Wells was asked if he had any documentation in regard to his detainment of Victim #1, he stated he should have then opened the reporting system on his cell phone. A search of Victim #1's name through his reporting system produced negative results. Wells then shrugged off the lack of documentation stating "it must be on my pad then." Wells then stated "this area is a big drug area, it's a big homeless area; a constant drug dealer and meth user area." During his interview Wells was asked if he has ever had any sexual encounter with someone while he is working. He said "no." When asked if he would allow for a sample of his DNA to be collected, Wells said he would have to contact his attorney. Wells then stated, based on the accusations against him he would like to talk to his attorney, at which time the interview was concluded and Wells was allowed to leave.

I am requesting an arrest warrant for Brandon Wells in regard to this investigation. Wells presents a safety threat to Victim #1 and the other residences in that area. His profession affords him the ability to patrol an area and carry a firearm. In his statement Wells stated he knows Victim #1's boyfriend and is familiar with her being in his patrol area.

## PROBABLE CAUSE STATEMENT FORM

CRN 23-050860 / 23-048016

### CRN #23-048016

On 07-21-23, Det. Keller responded to 1300 Cherry St. and contacted Victim #2 in regard to a separate case. Victim #2 believed the detective was there to speak to her about a rape that occurred approximately 2-3 weeks prior. Victim #2 described being detained by security guards, and Kansas City Police Officers arriving, but the officers left without arresting her due to a shooting that occurred in Independence. One of the security guards then took Victim #2 to the Waffle House located at 6840 E. Front St., Kansas City, Jackson County, Missouri and raped her by a dumpster.

On 08-10-23, a search of calls for service in the area of 10<sup>th</sup> St. and Benton Blvd. produced a call at 918 Benton Blvd. on 07-09-23, at 0433 hours, from "Brandon-Security". The phone number on the call matched to the phone number of a suspect from a separate sodomy case, Brandon Wells. Body camera footage from officers on that call was able to corroborate information Victim #2 had provided. Kansas City Police Officers arrived and contacted Wells and another security guard who had Victim #2 in the backseat of Wells' vehicle. While on scene, officers received information of Independence Police Officers having been shot at, and they left Victim #2 with the security guards.

On 08-14-23, Det. Kinate and I responded to the Waffle House on Front St. and were able to view surveillance footage which further corroborated Victim #2's statement. On 07-09-23, at approximately 0528 hours, Wells' vehicle, a white SUV with a light bar on top, was seen entering the Waffle House parking lot. Wells was seen exiting the vehicle, walking up to the building, and reaching for something on the awning. He then returned to the vehicle and began talking to someone in the rear of the vehicle, who based on the statement given, and the short amount of time that had passed, appeared to be Victim #2. A short time later, Wells is seen using his flashlight to motion a couple of other vehicles from entering the lot. Wells then drove to the north side of the building by the dumpsters. Wells took Victim #2 out of the back seat of the vehicle and approached the dumpster. While the camera view was mostly obscured by the dumpster, there were occasions where they could still be seen, and there is audio, but due to the traffic, and distance from the camera, the only thing that could be heard at times was indistinguishable yelling at times. Victim #2 appeared to be let out of handcuffs because her arms were seen reaching into the air, and she seemed to be rubbing her wrists. They went back to the rear of the vehicle where Wells was seen reaching for Victim #2, and she pulled her arm quickly away. Wells then appeared to grab her arm, while Victim #2's body drops down like she was trying to get away from him, and Wells appeared to pull on her arm again and walked her to the front of the dumpster. After approximately 4 minutes, Wells is seen walking back to the vehicle and then Victim #2 walked back while adjusting her clothing, and they leave with Victim #2 now in the front seat.

On 08-17-23, I received the video footage from the Waffle House, Inc. Director of Security. He advised Wells had been hired to watch over that Waffle House location while it was closed, and they tracked Wells on his cell phone, via GPS, to ensure that he stayed on property. The Director of Security concluded the item Wells grabbed off the awning was most likely his cell phone to make it look like he stayed on property because their location hits do not show him leaving, when he obviously had already left.

On 08-21-23, I responded to 1300 Cherry and contacted Victim #2. Victim #2 stated she was at an apartment by 10<sup>th</sup> St. and Benton Blvd. with a friend, and as they were walking out, they were stopped by 2

**PROBABLE CAUSE STATEMENT FORM**

CRN 23-050860 / 23-048016

security guards who she thought were police at first. Victim #2 was placed into handcuffs and was told they were trespassing. Victim #2 was searched by Brandon Wells, which he did by pulling her shirt and bra out and looked down her shirt, and then pulled her pants out and looked down them. Kansas City Police Officers arrived and spoke to the security guards while Victim #2 was in the back of the security vehicle. She stated the vehicle was white and looked like a “cop car”. After a few minutes, the police officers said there was a shooting in Independence and they had to go. After the officers left, the security guards let her friend go, and Victim #2 was told she was being taken to jail. She stated Wells was driving and the other guard was in the front passenger seat. They drove to an unknown location where the other security guard was dropped off, and then Wells drove them to the Waffle House on Front St.

Wells flagged some vehicles out of the parking lot, and then parked by the dumpster at the back of the building and had her stand in front of the dumpster. Wells pulled her pants down, and inserted his penis into her vagina while standing behind her. Victim #2 mentioned a couple of times that Wells was very large and intimidating, and that she was scared. When they left the Waffle House the Victim sat in the front seat, and was dropped off at a gas station around 87<sup>th</sup> St.

Victim #2 stated she told Wells “no” multiple times, and was “balling”. She felt that she was in a situation that she could not handle. Victim #2 said she was emotionally distraught, and could not eat, or talk, to anyone about what happened.

On 08-11-23, Wells was charged with Sodomy, Kidnapping, and Assault in regard to case KC23050860.

On 08-15-23, Tactical Response Team members with the Kansas City Police Department responded to Wells’ address. While there, Wells called and spoke to police from a phone number with a Florida area code. Wells stated he would turn himself in when he was ready, and refused to disclose his location.

On 08-16-23, Wells was taken into custody in Florida and is currently awaiting extradition.

Printed Name Det. Robert Roubal #5075 Signature /s/ Det. Robert Roubal #5075

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

\_\_\_\_\_  
Judge

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