

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

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| POLICE NO. : | 23-052767 |
| PROSECUTOR NO. : | 095475912 |
| OCN: | QO012589 |

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| FILED |
| CRIMINAL RECORDS |
| 08-SEP-2023 15:46 |
| CIRCUIT COURT OF JACKSON COUNTY, MO BY <u>James M. Baum</u> |

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|---------------------------|---|-------------------------|
| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| |) | |
| COURTNEY J WILCOX |) | |
| 34605 Henry Lane |) | CASE NO. 2316-CR |
| Dixon, MO 65459 |) | DIVISION |
| DOB: [REDACTED] |) | |
| Race/Sex: W/F |) | |
| S.S.N.: [REDACTED] |) | |
| |) | DEFENDANT. |

AMENDED 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 on or about August 3, 2023, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly caused the death of Confidential Victim by shooting him.

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 (571.015-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about August 3, 2023, in the County of Jackson, State

of Missouri, the defendant, either acting alone or purposefully in concert with another committed the felony of Murder in the Second Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant, or another, 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.

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/ Traci A. Stansell
Traci A. Stansell (#41903)
Assistant Prosecuting Attorney

321 W. Lexington
Independence, MO 64050
(816) 881-4591
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WITNESSES:

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

PROBABLE CAUSE STATEMENT

FILED
DIVISION 30

08-Sep-2023 11:28

CIRCUIT COURT OF JACKSON COUNTY, MO
BY Laurie P. Barrett DCA

Date: 09-07-23

Report #: 2023-52767

I, John Roach, a Detective with the Independence, Missouri Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 08-03-23 at 0206 hours, Courtney Joe Wilcox, committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 08-03-23 at 0209 hours, Officers with the Independence Missouri Police Department were dispatched to 9803 E. US 40 Highway, Independence, Jackson County Missouri, the Sports Stadium Inn Motel, on a report of shots being fired in the area.

Upon Officer's arrival the Victim was located lying on his back, deceased, in the parking lot of the Motel. Two .223 caliber shell casings were located to the north and east of the Victim's body.

An autopsy would later show the Victim was shot one time in the back which exited through his chest causing his death.

Detective Roach arrived on scene and made contact with an individual who will be identified as Witness 1. Witness 1 identified the Victim stated she and the Victim had checked into room 310 at the Motel on 08-02-23 late in the evening. Witness 1 advised she got tired and went to bed. Witness 1 stated her last contact with the Victim was on 08-03-23 around 0030 when the Victim advised he would be outside. Witness 1 advised she knows the Victim uses and sells narcotics, but she did not have intimate knowledge of his activities.

Surveillance footage from the Sports Stadium Inn was retrieved and viewed by Detective Roach.

On 08-03-23 at approximately 0135 hours a silver Sedan and a black SUV are seen parking in front of the Sandbar Lounge, 9807 US 40 Highway, Independence Missouri. Both vehicles remain in that area until 02:09.

At 08-03-2023, 02:07 the Victim is observed walking to the front of the motel property and is holding his cell phone while looking around. The Victim is observed communicating with someone via his cell phone. He is then observed walking toward the Sedan and the SUV. As the Victim is walking past the SUV he suddenly turns and runs toward the entrance to the Motel.

A subject is observed getting out of the front passenger seat of the SUV and firing a rifle at the Victim. The Victim is observed falling to the ground, deceased. The subject then gets back into the SUV.

At 02:09 hours a subject is observed exiting the rear driver's side of the SUV and getting into the Sedan which was still parked in front of the Sandbar Lounge. Both vehicles then leave westbound on 40 Highway.

On 08-04-23 video surveillance was received from KC Liquors at 9811 US 40 Highway. On 08-03-23 at 01:37 a silver sedan and black SUV are seen parking in front of the Sandbar Lounge. Subjects are observed interacting between the two vehicles. Both vehicles are then observed leaving the scene at 02:09 westbound on 40 Highway.

During the course of the investigation a cellphone number, 785-219-1605, was found to be at the Sports Stadium Inn Motel at the time of the homicide. Further investigation revealed this number and the device attached to it belonged to and was in the possession of Defendant Wilcox.

On 08-24-23 Witness 1 responded to the Independence Police Station for a formal interview. Witness 1 stated on 08-02-23 the Victim asked her to pick him up behind the American Inn Motel in Kansas City Kansas. She stated when the Victim got into her car, he told her he had just stolen \$1000 from a female, who was later identified as Defendant Wilcox. The Victim advised Defendant Wilcox had drove him to the Motel to purchase \$1000 in narcotics. He further advised there was no one at the Motel to purchase narcotics from and he intended to steal Defendant Wilcox's money. The Victim then told Witness 1 to leave the property and advised Defendant Wilcox was still parked in front of the Motel.

On 09-07-23 Defendant Wilcox was taken into custody in St. Roberts Missouri on a Person of Interest Order which had been issued by Detective Roach. She was transported to the St. Roberts Police Department for a formal interview. Prior to the interview Defendant Wilcox was read and signed the Miranda Warning of Rights form.

During the interview Defendant Wilcox admitted she had given the Victim \$1000 to purchase narcotics for her. She stated she drove him to the American Inn Motel in Kansas City Kansas where the Victim got out of her vehicle and went inside. Defendant Wilcox advised a substantial amount of time passed before she realized the Victim had "ripped her" of her money.

Defendant Wilcox stated she then called a subject who will be referred to as Involved 1. She immediately described Involved 1 as a "psycho mother fucker". Defendant Wilcox stated she told Involved 1 what the Victim had done and asked him to help her find the Victim and retrieve her money. When asked, Defendant Wilcox advised she called Involved 1 because she knew he would be able to find the Victim.

Defendant Wilcox stated she met Involved 1 near KU Medical Center, and he was driving the silver Sedan observed in the surveillance footage. She advised she got into the vehicle, and they began to drive around while Involved 1 attempted to locate the Victim.

Defendant Wilcox advised a few hours later Involved 1 received a call from an unknown female who provided the location of the Victim. She advised Involved 1 drove them to the BP Gas Station at 4009 Blue Ridge Cutoff in Kansas City.

Defendant Wilcox advised when they arrived at the BP they met up with the black SUV observed in the surveillance footage. She advised there were two unknown males in the front driver and passenger seats, one of which had a mask over his face. She advised Involved 1 walked to the SUV and spoke to the occupants for a few minutes. Defendant Wilcox said

Involved 1 then drove to the Sports Stadium Inn with the black SUV following. She stated they parked in front of the Sandbar Lounge and Involved 1 exited the vehicle and got into the back seat of the SUV while she remained in the Sedan.

Defendant Wilcox stated a short while later is when she observed the Victim standing in front of the motel. She stated she watched as he looked in her direction and began to walk toward the Sedan. Defendant Wilcox said as he was passing the SUV the Victim looked over at the SUV and then began to run back to the Motel. She advised the front occupant of the vehicle got out and shot the Victim.

During the investigation it was learned that the Victim was lured to the front of the Motel by Involved 1 under false pretenses. Messages between Involved 1 and the Victim showed Involved 1 telling the Victim he was in a silver Sedan next to a "black truck".

Defendant Wilcox stated Involved 1 got out of the SUV and back into the driver's seat of the Sedan. She stated he told her he had tried to get out of the SUV during the shooting, but his door got stuck. She said Involved 1 drove the Sedan from the scene of the homicide.

After the interview Defendant Wilcox was presented with a photo line up depicting Involved 1 and provided a positive identity.

Due to her involvement in the homicide Defendant Wilcox was transported to the Independence Police Department where she was booked in on the Person of Interest Order.

Detective J. Roach

/s/ John Roach

Print Name

Signature