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

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-	PROSECUTOR NO. :	0954	75447		
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STATE OF MIS	SSOURI,)		2023 SEP 29	CRIMINAL
	PLAINT)	(FF ,)		- 0	
vs.)		6	7
CAMERON KE DOB: Race/Sex: B/M S.S.N.:	JUAN LEE HARPER) CASE NO. 2316-CR03435-01 DIVISION 3	PH 4: 04	200
to a manufacture of the same	DEFENDA	NT.			

SUPERSEDING INDICTMENT

In the Circuit Court of Jackson County, Missouri, at Kansas City, March Term, 2023. In Division Number 3 thereof, designated by the rules of said Court as Criminal Division A.

Count I. Murder 1st Degree (565.020-001Y20200901.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 August 2, 2023, in the County of Jackson, State of Missouri, the defendant, after deliberation, knowingly caused the death of by shooting him, and that the defendant was eighteen years of age or older at the time of the offense.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

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 Grand Jurors of the County of Jackson, State of Missouri, charge 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 2, 2023, in the County of Jackson, State of Missouri, the defendant 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 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.

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

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of 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 August 2, 2023, at the defendant, knowingly shot a firearm at another person,

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 Grand Jurors of the County of Jackson, State of Missouri, charge 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 2, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon - Shooting at a Person charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon - Shooting at a Person 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.

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

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 August 2, 2023, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Smith and Wesson .40 caliber handgun, a firearm, and on 08/02/2022, the defendant was convicted of the felony of Aggravated Battery in the District Court of Johnson County, Kansas.

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.

Count VI. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201305.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of Section 565.050, RSMo, committed the class A felony assault in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about August 2, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to by shooting.

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 VII. Armed Criminal Action (571.015-001Y20205213.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 2, 2023, in the County of Jackson, State of Missouri, the defendant the felony of Assault in the First Degree charged in Count 6, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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

The Grand Jurors of the County of Jackson,	State of Missouri, charge that the defendant, in
violation of in violation of Section 571.030, RSMo,	committed the class B Felony of unlawful use
of a weapon, punishable upon conviction under S	ections 558.011 and 571.030.9, RSMo, in that
on or about August 2, 2023, at	, in the County of Jackson, State of Missouri,
the defendant, knowingly shot a firearm at another	person,

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 IX. Armed Criminal Action (571.015-001Y20205213.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 2, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon - Shooting at a Person charged in Count 8, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon - Shooting at a Person by, with and through, the knowing use, assistance and aid of a deadly weapon.

Count X. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201304.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of Section 565.050, RSMo, committed the class A felony assault in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about August 2, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to by shooting by shooting

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 XI. Armed Criminal Action (571.015-001Y20205213.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 2, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count 10, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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

The Grand Jurors of the County of Jackson,	State of Missouri, charge that the defendant, in
violation of in violation of Section 571.030, RSMo	, committed the class B Felony of unlawful use
of a weapon, punishable upon conviction under S	sections 558.011 and 571.030.9, RSMo, in that
on or about August 2, 2023, at or near	, in the County of Jackson, State of
Missouri, the defendant, knowingly shot a firearm	at another person,

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 XIII. Armed Criminal Action (571.015-001Y20205213.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 2, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon - Shooting at a Person charged in Count 12, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon - Shooting at a Person by, with and through, the knowing use, assistance and aid of a deadly weapon.

Count XIV. Murder 1st Degree (565.020-001Y20200911.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 July 31, 2023, in the County of Jackson, State of Missouri, the defendant, after deliberation, knowingly caused the death of by shooting by shooting and that the defendant was eighteen years of age or older at the time of the offense.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

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 XV. Armed Criminal Action (571.015-001Y20205213.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 July 31, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree charged in Count 14, 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.

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

The Grand Jurors of the County of Jackso	n, State of Missouri, charge that the defendant, in
violation of in violation of Section 571.030, RSM	lo, 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 31, 2023, at	, in the County of Jackson, State of Missouri, the
defendant, knowingly shot a firearm at another p	erson,

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 XVII. Armed Criminal Action (571.015-001Y20205213.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 July 31, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon - Shooting at a Person charged in Count 16, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon - Shooting at a Person 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.

Wherefore this Indictment supersedes any Complaint, Information, or Indictment previously filed in the Associate Circuit Court.

A TRUE BILL

Robin	D	Perusich
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JEAN PETERS BAKER PROSECUTING ATTORNEY FOR THE COUNTY OF JACKSON, STATE OF MISSOURI, by

by, Joel E Ritchie (#71249)
Assistant Prosecuting Attorney
415 E. 12th Street 11th Floor
Kansas City, Missouri 64106
jeritchie@jacksongov.org

Received this 29th day of September, 2023.

oxtimes SUMMONS TO ISSUE.	BOND TO REMAIN AS PREVIOUSLY SET. SPECIAL
	CONDITIONS SHALL REMAIN IN EFFECT.
\square WARRANT ISSUED IN	BASE CASE TO REMAIN ACTIVE.
	BOND AND SPECIAL CONDITIONS TO REMAIN AS
	PREVIOUSLY SET.
☐ WARRANT TO ISSUE.	BOND SET AS FOLLOWS: \$

WITNESSES:

The State's witnesses are included on the "State's Witness List" filed contemporaneously with this Indictment.