

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

AT

INDEPENDENCE

POLICE NO. :	24-000038
PROSECUTOR NO. :	095477370
OCN:	CW008180

STATE OF MISSOURI,

PLAINTIFF,

vs.

JOHN J HORTON JR

6117 Ditzler

Raytown, MO 64133

DOB: [REDACTED]

Race/Sex: W/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2416-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Assault 1st Degree Or Attempt (565.050-002Y20201399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo., committed the class A felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo., in that on or about January 5, 2024, in the County of Jackson, State of Missouri, the defendant approached Confidential Victim, a law enforcement officer acting in the performance of his duties and a special victim, with an explosive device and requested a lighter from the Confidential Victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree.

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.

Count II. Unlawful Possession Of An Explosive Weapon (571.072-001Y20205211.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.072, RSMo., committed the class D felony of unlawful possession of an explosive weapon, punishable upon conviction under Section 558.011, RSMo., in that on or about January 5, 2024, in the County of Jackson, State of Missouri, the defendant possessed an improvised explosive device and had previously been convicted of a dangerous felony as defined in RSMo. 556.061, specifically a conviction on May 7, 2009, Case # 0816-CR05715-01, for Murder in the Second Degree, 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/ Arthur R. Bridgens

Arthur R. Bridgens (#68625)
Assistant Prosecuting Attorney
321 W. Lexington Avenue
Independence, MO 64050
(816) 881-4583
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WITNESSES:

The State's witnesses as of 1/6/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

Probable Cause Statement Form

Date:01/06/24

Report: 24-0038

I, Detective L. Jackson, 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 06/05/22 in Jackson County, Missouri., John J Horton Jr. committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 01-05-2024 at approximately 2333 hours, Raytown Police [REDACTED] was unexpectedly contacted by the defendant by the defendant while sitting in his marked patrol vehicle that was parked in the parking lot of [REDACTED] Raytown, Jackson County, Missouri, 64133. The defendant walked south from [REDACTED] to [REDACTED] patrol vehicle's front passenger window.

Upon seeing the defendant [REDACTED] lowered his patrol vehicle window and conversed with the defendant. The defendant asked [REDACTED] "how" and "when" he could change his life. Upon [REDACTED] giving the defendant some encouraging advice, the defendant inquired about a \$150,000 bounty amount for an unidentified individual. After receiving an answer from [REDACTED] the defendant asked for matches and a lighter. Upon [REDACTED] telling the defendant, "No", the defendant advised he was the [REDACTED], was going to change [REDACTED] going to give [REDACTED] something.

Upon hearing the defendant [REDACTED] asked for clarification on what the defendant meant, and proceeded to exit his patrol vehicle. Upon hearing [REDACTED] defendant uttered, "Ima put it back here so you can look at...", and expressed his feelings and belief of an unidentified individual being "a straight piece of shit", treating him "shitty" and "the only answer to a piece of shit is fuck it we both go right?" Upon [REDACTED] seeking clarification on what the defendant had meant, the defendant uttered, "Here...Take that..." and placed a cylinder-shaped object wrapped in clear plastic wrap and had a red fuse protruding from the object on [REDACTED] vehicle's rear bumper.

The defendant acknowledged the object was a bomb, backed away for the patrol, and was later apprehended by [REDACTED]. Kansas City Missouri Police Department Bomb Squad Unit [REDACTED] later confirmed the object to be a viable improvised explosive device constructed of black powder, a fuse, and a hazardous enhancement material that was a metal breakaway utility knife. The bomb was defused by the bomb squad and its components were recovered.

On 01/06/24 at approximately 0400 hours, [REDACTED] was contacted by Witness #1 who advised that he was [REDACTED] and inquired about the defendant's whereabouts. Upon being informed by [REDACTED] the witness reported the defendant, and he had engaged in a verbal argument earlier during the night while [REDACTED]. The witness further advised the defendant produced a wrapped clear object, advised that the object was a bomb, and asked for help with getting rid of it. The witness reported he threw the object [REDACTED] and the defendant retrieved it and walked away.

During a Mirandized interview with Detective Jackson, the defendant reported his purpose and reason for contacting [REDACTED] was to get advice on how he could change and better his life. The defendant denied wanting to hurt and/or injure [REDACTED] and upon [REDACTED] overreaction to his questions voluntarily surrendered some “fireworks” via placing the “fireworks” on [REDACTED] patrol vehicle’s rear bumper. The defendant denied making the “fireworks” inside his father’s and his residence and reported that the “fireworks” were given to him by an unidentified person. The defendant, upon being challenged about him asking [REDACTED] for a lighter or matches, adamantly denied asking [REDACTED] for a lighter and/or a match and insisted that he did not intend to do any harm to [REDACTED]

A review of [REDACTED] patrol vehicle’s dash cam’s audio recorder was consistent with the written statement made by [REDACTED]

A search warrant for the defendant’s residence was later obtained and executed yielding no explosive devices, components, and/or accessories.

Name: Detective Larry Jackson #1428

Signature: /s/ Det. Larry Jackson