

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC24009206
PROSECUTOR NO. :	095477834
OCN:	

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 CHARLIE L BOWMAN)
)
 4937 BELLEFONTAINE AVE) CASE NO. 2416-CR
)
 KANSAS CITY, MO 64130) DIVISION
)
 DOB: [REDACTED])
)
 Race/Sex: B/M)
)
 S.S.N.: [REDACTED])
)
 DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200901.0)

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 February 12, 2024, 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 her.

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 February 12, 2024, 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 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 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 February 12, 2024, in the County of Jackson, State of Missouri, the defendant knowingly possessed a silver Lorcin 380 pistol, a firearm, and on or about January 13, 1994, the defendant was convicted of the felony of Trafficking Drugs 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/ Hallie L. Schuman

Hallie L. Schuman (#66333)
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WITNESSES:

The State's witnesses as of 2/13/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 02/12/2024

CRN: KC24009206

I, Detective Robert Maser #5374, 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 02/12/2024, at [REDACTED] in
(Date) (Address)

Kansas City, Jackson Missouri Charlie L Bowman
(County) (Name of Offender(s))

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

The facts supporting this belief are as follows:

On 02/12/2024 at approximately 0039 hours, officers of the Kansas City Missouri Police Department were dispatched to [REDACTED]

Upon arrival, officers located [REDACTED] suffering from an apparent gunshot wound to the chest. Officers contacted fire department personal who pronounced the victim deceased at 0047 hours.

Officers contacted suspect, Charlie L Bowman [REDACTED], and [REDACTED] who remained on scene and were observed standing outside of a white colored Buick Lesabre parked across the street from the victim.

Both parties were transported to Police Headquarters for statements in regard to the incident.

Detectives processed the crime scene along with members of the Kansas City Missouri Police Departments' crime scene unit.

Detectives observed a white colored Buick Lesabre, bearing [REDACTED], parked north of [REDACTED], along the west side. The front passenger door was observed to have been left open and a wine bottle was located on the lid of the trunk. A silver colored, Lorcin 380 pistol with magazine, was located directly north of the vehicle, in the street. A single spent Federal .380 auto, shell casing was located directly east of the vehicle, behind the rear driver's door. A cell phone was located north and east of the vehicle, in the street. The victim was located along the [REDACTED]. The victim was observed with her head orientated to the west, with her feet facing east. The victim was observed with defects to the right breast and wrist. The victim was observed wearing a yellow knit hat, red under shirt, yellow sweatshirt, red and black plaid jacket, yellow sweatpants, and white and pink colored Nike tennis shoes.

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[REDACTED]

Detectives located video footage from [REDACTED]. A review of the video footage revealed the white colored Buick LeSabre, arrive at the location at approximately 0023 hours. At approximately 1224 hours a silver Chevrolet Equinox is observed pulling in behind the Buick. After a short period of time the Chevrolet pulls next to the Buick, which was parked [REDACTED]. The victim can be observed exiting the front passenger seat of the Chevrolet who then walks over the front driver's door of the Buick. The victim immediately flees the side of the Buick and continues to flee [REDACTED] behind the Chevrolet before coming to rest [REDACTED]. A male wearing an apparent hooded sweatshirt and long pants exits the driver's seat and runs after the victim before continuing south along [REDACTED]. The suspect [REDACTED] before eventually returning the passenger side of the Buick all the while carrying what appeared to be a handgun. The suspect is then observed speaking with the front passenger of the Buick. Both males remain outside of the vehicle, drinking from a wine bottle, before being detained by responding officers.

Detectives contacted [REDACTED], for a recorded statement at police headquarters. [REDACTED] advised he recalled the victim, Bowman, and himself were all riding around together in the victim's Buick. He recalled at some point they responded to [REDACTED] to gather some items which the victim placed in the back of the car. [REDACTED] recalled seeing silver colored SUV during the evening. He recalled [REDACTED] owned the vehicle and gave him a bottle of wine at some point. [REDACTED] recalled being at the location which was near [REDACTED]. [REDACTED] was inside the Buick when he heard gunshots. He observed the victim lying on the ground and recalled asking Bowman what happened. [REDACTED] advised he did not remember much else because he was drinking and using drugs before the incident. [REDACTED] was allowed to view the video surveillance recovered [REDACTED]. After viewing the video surveillance, he identified the male exiting the Buick and pursuing the victim as Charlie Bowman. [REDACTED]

Detectives contacted witness, [REDACTED] who stated she contacted the victim along with Bowman and [REDACTED] earlier in the evening, when they met at a gas station. [REDACTED] recalled the victim wanted to ride with her since Bowman and [REDACTED] wanted to use her vehicle (Buick). [REDACTED] recalled Bowman was acting weird and at one point pulled out his silver colored pistol and told her to be careful to run up on him. [REDACTED] and the victim eventually met up with Bowman and [REDACTED]. The victim instructed her to pull up next to Bowman and [REDACTED] so that she could tell them where to park. The victim exited her vehicle and approached the front driver's door of the Buick, where Bowman was sitting. As the victim opened the door she was immediately shot twice by Bowman. The victim fled behind the Chevrolet before collapsing on the sidewalk. [REDACTED] observed Bowman exit the vehicle and observed him with a pistol. Bowman continued to fire the gun so she fled the scene. [REDACTED] positively identified Charlie Bowman [REDACTED]

Detectives contacted Bowman for a recorded statement. Bowman stated he recalled being together with the victim and [REDACTED]. He recalled arriving to the location in the victim's Buick but could recall little after until he was

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placed into police custody. Bowman admitted to owning a chrome colored. 380 caliber handgun but added he had no reason to shoot the victim.

Printed Name Det. Robert Maser Signature /S/ Det. Robert Maser #5374

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

Judge

Circuit Court of _____ County, State of Missouri.