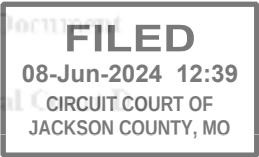


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC24035229
PROSECUTOR NO. :	095479316
OCN:	



STATE OF MISSOURI,)
)
) **PLAINTIFF,**)
)
) **vs.**)
)
)
) **JUSTYN T REEDUS**)
) **2031 E 70TH TER**) **CASE NO. 2416-CR**
) **Kansas City, MO 64132**) **DIVISION**
) **DOB:** [REDACTED])
) **Race/Sex: B/M**)
) **S.S.N.:** [REDACTED])
) **DEFENDANT.**)

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 May 31, 2024, in the County of Jackson, State of Missouri, the defendant knowingly, and with the purpose of causing serious physical injury to CONFIDENTIAL VICTIM, caused the death of CONFIDENTIAL VICTIM by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of CONFIDENTIAL VICTIM as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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.

Defendant is a prior offender under Section 558.016, RSMo, in that he has been found guilty

of a felony as follows: On or about January 6, 2014, defendant was found guilty of the felony of robbery in the second degree in the Circuit Court of Jackson County, Missouri.

Count II. Armed Criminal Action (571.015-001Y20205213.0)

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 May 31, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree, charged in Count I, 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 Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges 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 May 31, 2024, at CONFIDENTIAL ADDRESS, Kansas City, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons, namely Jacarious McKissic.

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. For any violation by a prior offender as defined in section 558.016, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation or conditional release for a term of ten years

Defendant is a prior offender under Section 558.016, RSMo, in that he has been found guilty of a felony as follows: On or about January 6, 2014, defendant was found guilty of the felony of robbery in the second degree in the Circuit Court of Jackson County, Missouri.

Count IV. Armed Criminal Action (571.015-001Y20205213.0)

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 May 31, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon, charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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.

State vs. Justyn T Reedus, Case No.

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/ Jamie K. Hunt

Jamie K. Hunt (#50401)

Assistant Prosecuting Attorney

415 E. 12th Street

Floor 7M

Kansas City, MO 64106

(816) 881-4622

jhunt@jacksongov.org

WITNESSES:

The State's witnesses as of 6/8/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 06/07/2024

CRN: KC24035229

I, Detective Adison Waterman #5789, Kansas City Missouri Police Department, 1010 Homicide Squad
(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 05/31/2024, at 600 E 110th Terrace in
(Date) (Address)

Kansas City, Jackson County Missouri Justyn Reedus
(County) (Name of Offender(s))

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

The facts supporting this belief are as follows:

On 05/31/2024 at 2321 hours, officers of the Kansas City Missouri Police Department were dispatched to [REDACTED], Kansas City, Jackson County, Missouri in regard to sounds of shots in the area. The officers located an individual suffering from apparent gunshot wounds in the front yard of [REDACTED], Kansas City, Jackson County, Missouri. EMS transported the victim to a nearby hospital for treatment where he ultimately succumbed to his wounds and a homicide investigation was initiated.

A search warrant was applied for and granted, allowing detectives to process [REDACTED] as a crime scene. The home was owned by one of the witnesses to the event. Six 9mm shell casings were located near the front porch area of the home. A cellular telephone was located on the ground near where the victim was lying prior to his transport to the hospital. Two firearms were located in the home, both of which had different caliber ammunition than the spent casings in the front yard.

Detectives contacted witness 1 who stated the victim and Justyn T. Reedus (B/M [REDACTED]) were engaged in a verbal argument that started inside the house. During the argument Reedus was very confrontational and encroaching into the victim's personal space. The victim made several attempts to get away from Reedus. Reedus and the victim went out onto the front porch where Reedus pulled out a gun and shot the victim. Witness 1 was shown a single photo of Reedus where she positively identified Reedus as the shooter.

Detectives contacted witness 2 ([REDACTED]) who stated the victim and Reedus had a verbal altercation which started inside of the incident location. During the argument, the victim stated he had enough of the argument and grabbed his stuff to leave. The argument continued as the victim walked out the front door onto the front porch. Witness 2 went outside to try and separate the victim and Reedus. As she walked out onto the front porch, she observed Reedus push the victim off the front porch and then shoot him 5 times before eventually leaving the scene. Witness 2 was shown a single photo of Reedus where she positively identified Reedus as the shooter.

PROBABLE CAUSE STATEMENT FORM

CRN KC24035229

Detectives obtained Vivint doorbell video footage at the residence, which was provided by witness 1. The video was broken up into two parts. The first part depicted Reedus and the victim on the front porch of [REDACTED] arguing. The second part began with Reedus pulling a pistol from his pants, shoving the victim off the porch and firing at him multiple times, knocking him to the ground.

On 06/07/2024 at 2052 hours, Reedus responded to Police Headquarters to turn himself in. Reedus was escorted to interview room 1 on the 7th floor of Police Headquarters. Detectives contacted Reedus and read him his Miranda rights. Reedus advised he understood his rights and requested an attorney.

Detectives are seeking an arrest warrant for Reedus for Murder in the 2nd degree.

Printed Name /S/ Det. Adison Waterman 5789 Signature /S/ Det. Adison Waterman 5789

The Court finds probable cause and directs the issuance of a warrant this 8th day of June, 2024.

SIGNED BY JUDGE

*This is a redacted public document. The original
unredacted document bears the Judge's signature.*

Judge

Circuit Court of Jackson County, State of Missouri.