

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

POLICE NO. :	24-076245
PROSECUTOR NO. :	095481957
OCN:	1Q000575

FILED DIVISION 28 27-Nov-2024 14:38 CIRCUIT COURT OF JACKSON COUNTY, MO BY <u>Jeffrey C. Keal</u> DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

STEVEN B. ROCK
401 W Marcia Avenue
Independence, MO 64050
DOB: [REDACTED]
Race/Sex: B/M
S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2416-CR
DIVISION

COMPLAINT
WARRANT REQUESTED

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted
Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y20200999.0)**

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 November 23, 2024, in the County of Jackson, State of Missouri, [REDACTED] was killed by being shot as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030, RSMo, committed by the defendant on or about November 23, 2024, in the County of Jackson, State of Missouri.

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 November 23, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of felony murder charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of felony murder 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, Resulting In Death Or Injury (571.030-015Y20205213.0)

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 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about November 23, 2024, at [REDACTED], in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a black 2008 Chevrolet Impala, and, as a result of the above described conduct, [REDACTED] suffered injury or death.

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 IV. 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 November 23, 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.

Count V. Abandonment Of A Corpse (194.425-001Y20205599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 194.425, RSMo, committed the class E felony of abandonment of a corpse, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about November 23, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, and was in the possession of the corpse of [REDACTED] and knowingly disposed of the corpse of [REDACTED] at the Interstate 435 southbound exit ramp to Truman Road without properly reporting the location of the body to the proper law enforcement officials.

The range punishment for a class E 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 four (4) 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/ Clayton O Whitworth

State vs. Steven B. Rock, Case No.

Clayton O Whitworth (#69780)
Assistant Prosecuting Attorney
321 W Lexington Ave
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WITNESSES:

The State's witnesses as of 11/27/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT

FILED DIVISION 28 27-Nov-2024 14:36 CIRCUIT COURT OF JACKSON COUNTY, MO BY <u>Jeffrey C. Keal</u> DCA
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Date: 11/26/2024

Report #: 2024-76245

I, Desiree Campbell, 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 November 23rd, 2024 at 2024 hours, Steven B. Rock, committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 11/23/24 at 2024 hours, Officers with the Independence Missouri Police Department were dispatched to a residence in Independence, Jackson County, Missouri regarding a shooting. Dispatch received several calls regarding the incident, one call being a shooting with someone shot that left the area in a vehicle and the second call being sound of shots fired.

Contact was made with Involved #2 at the address. Involved #2 originally reported that an unknown to her, white male (Victim) had been shot after he came over to the residence intoxicated and shot 4-5 rounds into the ground. Involved #2 stated she had met the victim on a previous occasion but did not know his name. Involved #2 stated Suspect #3, Suspect #2 and Suspect #2's boyfriend had to wrestle the gun away. Involved #2 then states that the victim ends up on the ground and Suspect #2's boyfriend lifted him into the backseat of the car. She stated Suspect #2's boyfriend then gets in the driver's seat and they all four left in the victim's vehicle.

While officers were on scene conducting and area check, Involved #3 and Involved #4 arrived. Involved #3 stated he had received a phone call from the Victim telling him he was at this address in Independence "in case something happens". The Victim asked Involved #3 to stay on the phone with him. Involved #3 stated he could hear several voices in the background of the phone call. Involved #3 described the voices as one female and one male voice. Involved #3 stated the call suddenly dropped or ended. Involved #3 stated he attempted to call the Victim's phone back, but it seemed like the Victim's phone was turned off or dead, leading him to be concerned for the Victim's safety. Involved #3 stated he immediately responded to the address the Victim told him he was at, to find officers investigating a shooting. Involved #3 advised that the Victim owned a Glock 17 handgun and used an iPhone. He described the iPhone as a newer model and having three cameras on the backside.

Involved #4 stated the Victim had called him and Involved #3 using a video chat app while on his way to this address. Involved #4 stated the Victim was going to the residence to sell marijuana and was hopeful to "hook up" with the girl at the residence that he believed to be Suspect #2. Involved #4 stated the Victim met Suspect #2 through Facebook and that was how he would meet girls to "hook up". Involved #4 stated during the video call, the Victim had stated Suspect #2 was trying to get him to come inside the residence, but the Victim told Involved #4 and Involved #3 that he was not going to go inside. The Victim then stated an unknown black male and Suspect #2 were exiting the residence and walking toward his vehicle. The Victim stated he was not going to let them into his car and kept repeating that to Involved #4. Involved #4 stated he could hear a male and female voice in the background of the phone call, yelling for The Victim to unlock and open the car doors. Involved #4 stated he could hear the subjects pulling hard on the door handles of The Victim's vehicle. Involved #4 stated suddenly the phone call ended.

On 11/24/2024 at 0324 hours, Involved #5 responded to police headquarters. Involved #5 stated the Victim had not returned her phone calls since the earlier incident. Involved #5 stated it is not like him to not return her phone calls. She stated he is very good about calling her back when she calls him. She requested that the Victim be entered as a missing person.

Video surveillance was recovered from Involved #7 and Involved #6. In the video, you can see the Victim's vehicle, a black 2008 Chevy Impala, backed into the driveway of the address. Three suspects approach the passenger side of the vehicle. A suspect, later identified as Rock, can be observed running around the back of the vehicle from the passenger side to the driver's door. Rock appears to open the driver's door and pull a person out of the driver's seat. The person is not moving and falls to the ground, before the Rock lifts him to place him into the back seat of the vehicle. Rock then gets into the driver's seat of the vehicle, and the vehicle leaves southbound.

On 11/24/24 at 1914 hours, Kansas City, Missouri Police Department contacted dispatch advising they had located the Victim's vehicle on the Interstate 435 southbound exit ramp to Truman Road. Inside the vehicle, the Victim was found in the backseat deceased, from apparent gunshot wounds.

On 11/25/24, a body exam was performed by the Jackson County Medical Examiner's Office with the following findings:

- One to the center of chest
- One to the chest left of the left nipple
- One to the lower left side of the torso
- One to the webbing area between the left index finger and left thumb with a possible projectile underneath the skin on the top of the hand at the wrist joint
- One to the upper left arm with a possible projectile underneath the skin and to the left

- One to the anterior side of the right arm
- One to the posterior side of the right arm
- One near the center of the right side of the torso
- One to the upper right side of the back
- One to the upper right side of the back near the armpit
- One to the back between the base of neck and the right shoulder area
- Possible projectile underneath the skin on the lower left side of the back

On 11/25/24, the Victim's vehicle was processed. In the vehicle were the following items recovered as evidence:

- Copper led bullet-located in the driver front seat
- Winchester 9MM spent shell casing-located in the rear driver side seat
- Winchester 9MM spent shell casing-located in the right front passenger seat

On 11/25/24, detectives recovered video from GFL Trash Company, [REDACTED] of the Victim's car being abandoned on 11/23/24 at 2026 hours. The video showed the vehicle drive close to the end of the ramp, then back up, coming to a rest about halfway down the ramp.

On 11/25/2024, Involved #1, was interviewed. Involved #1 stated she had received a phone call from Involved #2, on Saturday night stating "they're carrying a kid's body". She stated she asked, what kid and Involved #2 said, "the white boy". Involved #1 stated Involved #2 said, "they're carrying him from the driver's seat to the back seat. Involved #1 stated she knew that the shooting involved Suspect #3 and Suspect #2. She stated she knew it also involved "P", the Victim, and Suspect #2's boyfriend who she knew as "Stitch". Involved #1 stated she has been in contact with Suspect #2 several times through Facebook Messenger. She stated on the night of the incident, Suspect #2 called her and said the Victim had gotten drunk and shot four times into the ground then had passed out. Involved #1 stated Suspect #2 would not tell her current location.

Involved #1 stated she was trying to persuade Suspect #2 into turning herself in. Involved #1 stated she was unsure of their current whereabouts and had no way of tracking them. Involved #1 described "Stitch" to be a light skinned, black male with long dreadlocked hair. Involved #1 was shown a picture of Steven Rock and positively identified him as "Stitch". Involved #1 stated she knew the Victim to own a firearm. She stated she knew the handgun to be a "17".

On 11/25/24, Involved #2 was interviewed and stated on 11/23/24 she was in the residence of the address. She stated Suspect #2, Suspect #3 and Suspect #2's boyfriend "Stitch" were also at the residence. Involved #2 stated that the Victim had come over to the residence. She stated she has known the Victim for the past two weeks because he had been selling marijuana to Suspect #2, Suspect #3 and another

juvenile at the residence. She stated the Victim backed his vehicle into the driveway just as he had one in the past. She stated the Victim came inside the residence and he, Suspect #2, Suspect #3 and "Stitch" went to a back bedroom. She stated minutes later, Suspect #3, Suspect #2, and "Stitch" came out into the hallway and were whispering, but she was unsure what about. She stated, she was sure "they were setting him up".

Involved #2 stated Suspect #2, Suspect #3, "Stitch", and the Victim then left the residence. Involved #2 stated approximately 10 minutes later she heard numerous gunshots outside the residence. She stated she went to the doorway and observed Suspect #2, Suspect #3, and "Stitch" running around the vehicle. Involved #2 stated "Stitch" ran to the driver's door and pulled the Victim out of the front seat of the vehicle. Involved #2 stated he fell to the ground "like he was dead already". She stated she then watched "Stitch" put the Victim in the backseat of the vehicle on the driver's side. She stated she then saw "Stitch" get into the driver's seat while Suspect #2 and Suspect #3 get into the passenger side of the vehicle. She stated they then all left in the vehicle. Involved #2 was shown a picture of Steven Rock and stated, "That's him. That's Stitch".

On 11/25/24, an anonymous tip was received, stating that Rock was currently staying at an address in Lees Summit, Jackson County, Missouri. Detectives doing surveillance in the area observed Suspect #2 and Suspect #3, walking with Involved #8. They conducted a pedestrian check and took custody of the Suspect #2 and Suspect #3. Involved #8 stated he lives at the residence. Involved #8 stated Suspect #2, Suspect #3 and Rock had been staying at the residence since late night of 11/25/24.

Consent was given to search the residence in Lees Summit. Located in the residence was a Taurus GX4, 9mm, handgun that was reported stolen out of Independence, Missouri, and 9mm ammunition. The handgun and ammunition were located in a closet, wrapped in a t-shirt. One of the kinds of ammunition located was Winchester 9mm, the same kind as the casings recovered from the Victim's vehicle.

Involved #9 was interviewed by phone and stated she was told by Involved #8 that Rock had handed him the gun. She stated Involved #8 told her he had disassembled the gun and placed put it in the closet.

The Taurus handgun was reported stolen out of a vehicle at an address that is in close proximity to Rock's listed home address.

On 11/27/24, the Taurus was test fired for ballistic analysis. The ballistics NIBIN report showed that the handgun was the same gun used to fire the spent shell casings that were recovered from the victim's vehicle.

On 11/26/24, an interview was attempted with a DJO and Involved #1 present. Suspect #3 stated he did not wish to provide a statement to law enforcement in reference to the incident.

On 11/26/24, and interview was attempted with Suspect #2. Suspect #2 stated she didn't know what to say and asked for an attorney.

On 11/26/24, an interview was conducted with Rock. Rock stated he couldn't remember the incident. When Rock was told that he can be seen in video surveillance approaching the Victim's vehicle, pulling him out and loading him into the back seat, he stated "something was wrong with him. He needed the hospital". When asked what was wrong with the Victim, Rock stated "I don't know". Rock was told the victim was shot and that isn't something that people just forget. Rock was asked if Suspect #2 shot the Victim, and he shook his head no. Rock was asked if Suspect #3 shot the Victim, and he shook his head no. Rock was asked if he shot the Victim and he paused then stated "I don't know". Rock was told that all three of the suspects would be charged. Rock eventually asked for an attorney and the interview was ended.

Once back in the detention cell, Rock made a phone call. Rock stated to the person he called that all three of them were going to be charged. He then told the person, "The others don't deserve that. Its me."

Detective Desiree Campbell

/s/ Detective Desiree Campbell

Print Name

Signature