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

Police# 15-090172 Prosecutor# 095429674 1616-CR **364** OCN# W0007619

COMPLAINT

STATE OF MISSOURI

VS.

Jimmie L. Verge 2017 E. Linwood Blvd. #209 Kansas City, MO 64109

DOB: 09/30/1994; Race/Sex: B/M;

SS#

Defendant.

Count I. Robbery 1st Degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the Class A Felony of Robbery in the First Degree, punishable upon conviction under Section 558.011, RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others forcibly stole a Glock 19 handgun owned by Fanandous Groves, and in the course thereof the defendant was armed with a deadly weapon.

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 (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony

Jimmie L. Verge

of Robbery in the First Degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count III. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 558.011.1(1), RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, Fanandous Groves was killed by being shot and as a result of the perpetration of the Class A Felony Of Robbery in the First Degree under Section 569.020, RSMo committed by the defendant, either acting alone or purposefully in concert with others, on or about December 14, 2015, in the County of Jackson, State of Missouri.

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 (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Murder in the Second Degree charged in Count Three, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Jimmie L. Verge

Count V. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 558.011.1(1), RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, Gerrod Woods was killed by being shot and as a result of the perpetration of the Class A Felony Of Robbery in the First Degree under Section 569.020, RSMo committed by the defendant, either acting alone or purposefully in concert with others, on or about December 14, 2015, in the County of Jackson, State of Missouri.

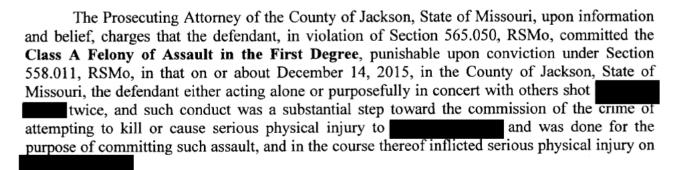
The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

Count VI. Armed Criminal Action (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count Five, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count VII. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841399.0)



An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Jimmie L. Verge

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 VIII. Armed Criminal Action (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Assault in the First Degree charged in Count Seven, 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.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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,

Jordan R. Bergus (#64729) Assistant Prosecuting Attorney 415 E. 12th St., 11th Floor Kansas City, Missouri 64106

(816) 881-3319 jbergus@jacksongov.org

WITNESSES:

PO Ryan J. Arnold, 1125 Locust, Kansas City, MO 64106 PO Adrian J. Campbell, 1125 Locust, Kansas City, MO 64106 DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106

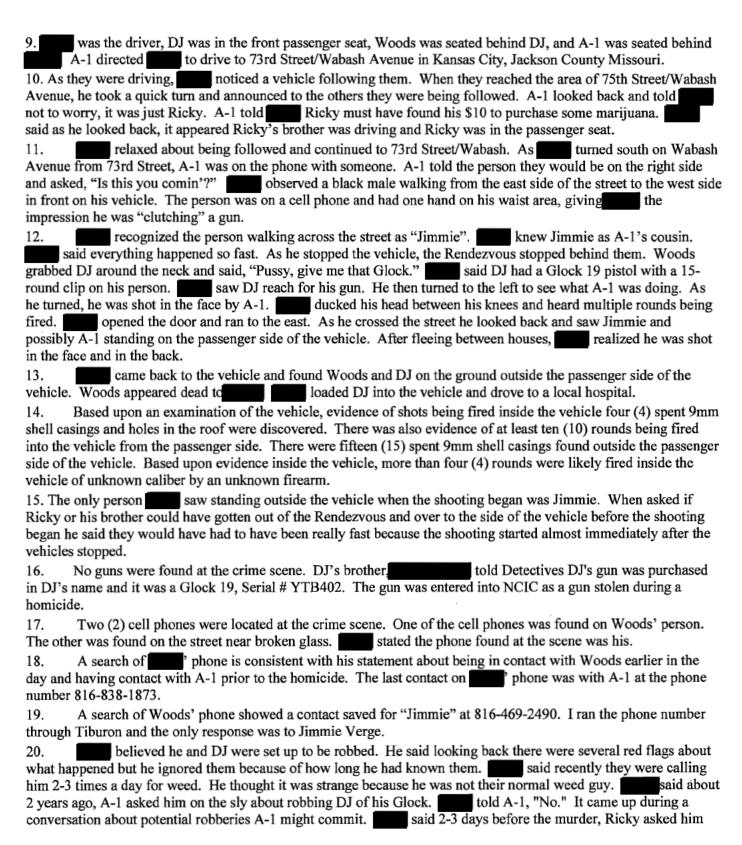
STATE OF MISSOURI

vs.

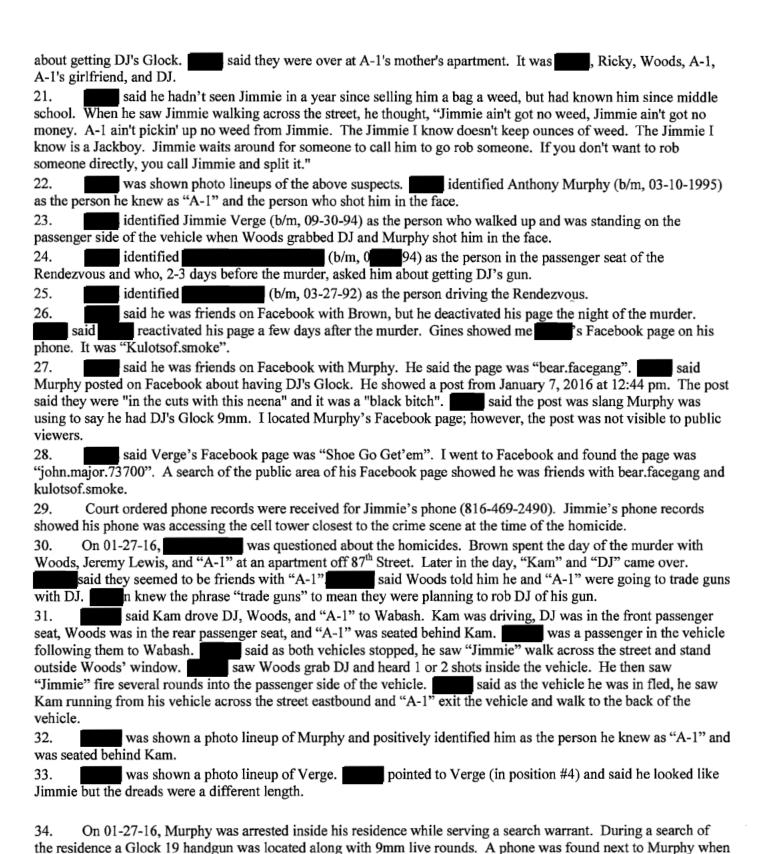
Jimmie L. Verge

Fanandous B. Groves, 7310 E. 118th Ter., Kansas City, MO 64134 DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106 DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106 DET Cristin Stammler, 1125 Locust, Kansas City, MO 64106 DET Brent R. Taney, 1125 Locust, Kansas City, MO 64106 DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

Date: 02-03-2016 CRN: 15-90172	
I, Detective Cristin Stammler #5312 (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 December 14, 2015, at 7300 Block Wabash Avenue (Date) (Address)	i
Kansas City, Jackson Missouri Jimmie L. Verge (Name of Offender(s))	
B/M, 09-30-1994, SSN: committed one or more criminal offer (Description of Identity)	nse(s).
Murder 2 Rob 1 ACA	
The facts supporting this belief are as follows:	
I am a Detective with the Kansas City, Missouri Police Department, and have been a sworn law enforce officer since 2001. I am currently assigned to the Homicide Unit and conduct death investigations. Since being assigned to the Homicide Unit, I have been involved in the investigation of more than fifty (50) homicides.	ment
2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other officers and witnesses. This affidavit is intended to show merely that there is sufficient probause for the requested warrant and does not set forth all of my knowledge about this matter.	
PROBABLE CAUSE 3. On December 14, 2015 at 9:13 p.m., Kansas City, Missouri Police Officers were dispatched to 73rd Stre Wabash Avenue in Kansas City, Jackson County, Missouri on a reported sound of shots. Upon arrival, Officers discovered a deceased male (later identified as Gerrod Woods) in the middle of the 7300 block of Wabash Avenue investigation revealed two additional victims and Fanandous "DJ" Groves) were self-transported to a local hospital where Groves died. All three victims suffered apparent gunshot wounds. Both dewere ruled homicide by the Jackson County Medical Examiner.	ue.
told Detectives on the day of the murder, he received a phone call from a person he knew as "A-1" asking him for a ride to go purchase marijuana. has sold marijuana to A-1 in the past and also provided transportation for him to go purchase marijuana. has known A-1 for over five (5) years and knew his first to be Anthony.	
stated earlier in the day he sold marijuana to Gerrod Woods. stated Woods and A-1 are counted stated DJ went with him to pick up A-1 because he did not trust A-1. knew A-1 and the perhaps out with had committed robberies and shootings in the past. did not believe A-1 would do anything because of the length of time they had known each other.	ople
and DJ drove to an apartment complex off of 87th Street. said the apartment was where Amother stayed; however, he always saw A-1 over there. Upon arrival to the apartment, saw A-1, Woods, and Ricky's brother. said they were all acting strange but eventually, A-1 and Woods got into the vehicle the marijuana.	Ricky,
8. said before they left, he saw Ricky's brother sitting in the driver seat of a vehicle and Ricky appearable looking for \$10. Gines said the vehicle was tan/black and he believed it was a Buick Rendezvous.	red to



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he was arrested. The phone number was 816 3 (the same phone used to communicate with the night of the murder). During questioning, Murphy denied any involvement in the murders. He was shown single photos of Woods, 35. Groves, Verge, and and Murphy identified Woods as his cousin but denied knowing any of the other involved parties. 36. On 02-02-16, Verge was arrested at his aunt's residence, located at 7431 Wabash Avenue. During a search of the residence a 9mm handgun was located along with 9mm live rounds. Verge's aunt stated earlier in the day she saw him with a handgun and he told her about being wanted for questioning in the double homicide in December. She asked him if he did it. Verge told her he didn't do anything but "a guy with him killed him." 37. During questioning, Verge denied any involvement in the murders. He was shown single photos of Woods, and Groves. Verge identifed Woods but had not seen him for a few months. He identified Murphy as "A-1" and said they grew up together but had not seen him since November. He identified but said he hadn't seen him in a while. Verge identified only as sousin. He said he did not know or Groves. Printed Name Detective Cristin Stammler #5312 Signature Det Stormule #5312 The Court finds probable cause and directs the issuance of a warrant this day of Judge

Circuit Court of County, State of Missouri.

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

Police# 15-090172 Prosecutor# 095429426 1616-CR OCN# B2102007

COMPLAINT

STATE OF MISSOURI

VS.

Anthony E. Murphy 8633 Utopia Parkway #9 Kansas City, MO 64138

DOB: 03/10/1995; Race/Sex: B/M;

SS#

Defendant.

Count I. Robbery 1st Degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the Class A Felony of Robbery in the First Degree, punishable upon conviction under Section 558.011, RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others forcibly stole a Glock 19 handgun owned by Fanandous Groves, and in the course thereof the defendant was armed with a deadly weapon.

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 (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Robbery in the First Degree charged in Count One, all allegations of which are incorporated

Anthony E. Murphy

herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count III. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 558.011.1(1), RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, Fanandous Groves was killed by being shot and as a result of the perpetration of the Class A Felony Of Robbery in the First Degree under Section 569.020, RSMo committed by the defendant, either acting alone or purposefully in concert with others, on or about December 14, 2015, in the County of Jackson, State of Missouri.

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 (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Murder in the Second Degree charged in Count Three, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Anthony E. Murphy

Count V. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 558.011.1(1), RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, Gerrod Woods was killed by being shot and as a result of the perpetration of the Class A Felony Of Robbery in the First Degree under Section 569.020, RSMo committed by the defendant, either acting alone or purposefully in concert with others, on or about December 14, 2015, in the County of Jackson, State of Missouri.

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 VI. Armed Criminal Action (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count Five, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count VII. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841399.0)

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 December 14, 2015, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others shot twice, and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Anthony E. Murphy

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 VIII. Armed Criminal Action (571.015-001Y19755299.0)

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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Assault in the First Degree charged in Count Seven, 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.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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

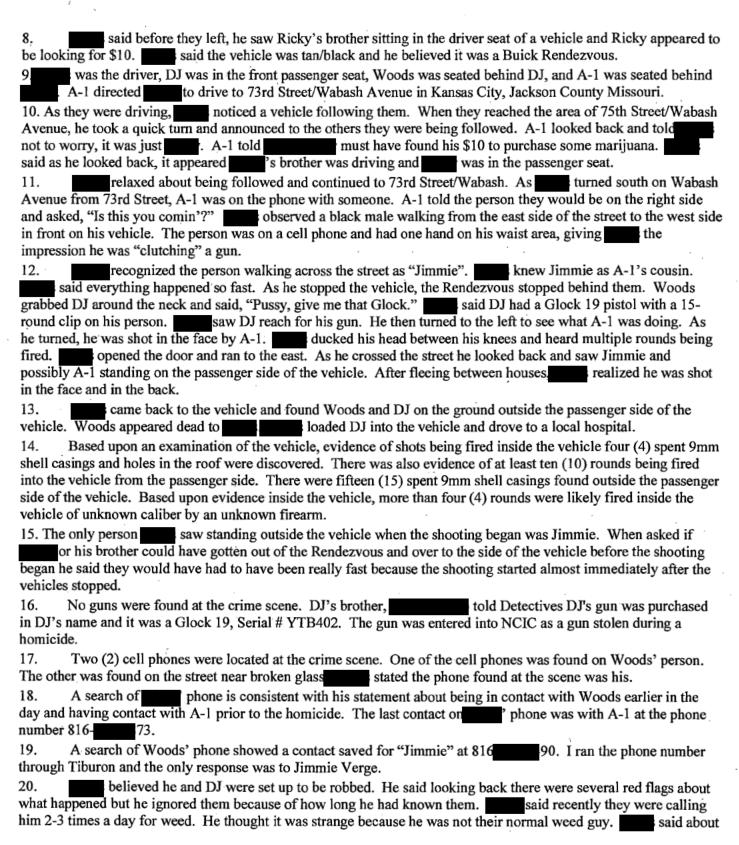
Prosecuting Attorney Jackson County, Missouri by,

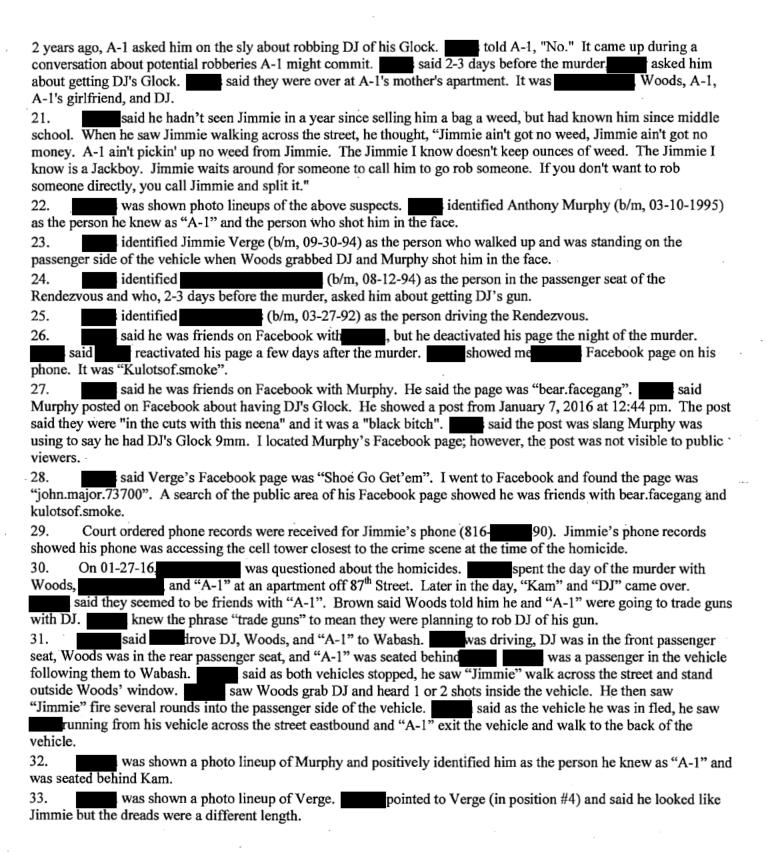
Jordan R. Bergus (#64729) Assistant Prosecuting Attorney 415 E. 12th St., 11th Floor Kansas City, Missouri 64106 (816) 881-3319 jbergus@jacksongov.org

WITNESSES:

PO Ryan J. Arnold, 1125 Locust, Kansas City, MO 64106 PO Adrian J. Campbell, 1125 Locust, Kansas City, MO 64106 DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106

Date: 01-28-2016				CKIN:	15-90172		
•							
I, Detective Cristin Stammler #5312							
(Name and identify law enforcement officer	r, or person ha	aving informat	ion as probable	e cause.)			_
					contained h	arain ara trus	
knowing that false statements on this for	in are puni	shable by la	w, state mat	the facts	contained if	lerem are true.	
I have probable cause to believe that on	Decembe	r 14. 2015	, at 7300	Block Wa	abash Aveni	ue ir	1
Thave producte educe to serie to make on		ate)	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		(Address)		-
Kansas City, Jackson	Missouri	Anthony I					_
(County)			(Na	me of Offe	nder(s))		
DA 62 10 1005			•44-			-1 - CC (-)	
B/M, 03-10-1995, (Description of Identity	<u>'</u>		_ committee	1 one or n	nore crimina	al offense(s).	
Murder 2	"						
Assault 1							
Rob 1							
ACA					-		
The facts supporting this belief are as foll 1. I am a Detective with the Kansas Cirofficer since 2001. I am currently assigned to assigned to the Homicide Unit, I have been in 2. The facts in this affidavit come from obtained from other officers and witnesses. To cause for the requested warrant and does not PROBABLE CAUSE	ty, Missouri o the Homici nvolved in th my personal l'his affidavi	ide Unit and one investigation observation to intended	conduct death on of more th s, my training to show mere	h investiga an fifty (5 g and expe ely that the	ations. Since (0) homicides brience, and in ore is sufficie	being s. nformation	
On December 14, 2015 at 9:13 p.m., Wabash Avenue in Kansas City, Jackson Condiscovered a deceased male (later identified a Further investigation revealed two additional transported to a local hospital where Groves owere ruled homicide by the Jackson County 14	unty, Missouras Gerrod Workins died. All thromographical Example murder, has a harmonical harmonical background by the murder harmonical b	ree victims suminer. ee received a sold mariju	ted sound of s middle of the and Fanando offered appare phone call fro	shots. Upon 7300 blocous "DJ" Cent gunshoom a person the past a	on arrival, On the of Wabash Groves) were of wounds. B on he knew as and also provi	fficers Avenue. self- Both deaths s "A-1"	
stated earlier in the day he solo stated DJ went with him to pic he hung out with had committed robberies and him because of the length of time they had kn and DJ drove to an apartment of mother stayed; however, he always saw A-1 of and Ricky's brother.	k up A-1 bead shootings nown each of complex off over there. I	cause he did in the past. ther. of 87th Stree Upon arrival	not trust A-1. did not et. said to the apartm	believe A	-1 would do ment was wh saw A-1, W	the people anything to here A-1's Yoods, Ricky,	
-					•	!	





On 01-27-16, Murphy was arrested inside his residence while serving a search warrant. During a search of the residence a Glock 19 handgun was located along with 9mm live rounds. A phone was found next to Murphy when he was arrested. The phone number was 816 (the same phone used to communicate with the night of the murder). 35. During questioning, Murphy denied any involvement in the murders. He was shown single photos of Woods, Groves, Verge, and Murphy identified Woods as his cousin but denied knowing any of the other involved parties.
Printed Name Detective Cristin Stammler #5312 Signature Det Stammler #5312
The Court finds probable cause and directs the issuance of a warrant this day of
Judge
Circuit Court of County, State of Missouri.