

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

Police# 12-001248  
Prosecutor# 095429817  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

vs.

**Craig L Brown  
5212 Mersington Ave.  
Kansas City, MO 64130  
DOB: 06/25/1991; Race/Sex: B/M;  
SS# [REDACTED]**

**Defendant.**

**Count I. Murder 2nd Degree (565.021-001Y19840904.0)**

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 13, 2012, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with others, knowingly or with the purpose of causing serious physical injury to Harry Stone caused the death of Harry Stone by shooting him.

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.

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.

**THE STATE OF MISSOURI**

**vs.**

**Craig L Brown**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

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Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, Missouri 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

DET Jimmy Wolsey , 10000 E. 59th Street, Raytown, MO 64133

## Probable Cause Statement Form

Date: 02-05-16

Report #12-1248

I, Detective Jimmy Wolsey, 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 05-13-12, at 67<sup>th</sup> St. and Blue Ridge Blvd., Raytown, Jackson County, MO, 64133, Mr. Craig L. Brown BM, born 06-25-1991, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 05-13-12 at around 0719 hours, Mr. Harry M. Stone white male born 03-19-1952 was shot while jogging in the area of 67<sup>th</sup> St. and Blue Ridge Blvd. Raytown, Missouri 64133. Mr. Stone was transported to an area hospital. Mr. Stone made a dying declaration to the anesthesiologist, [REDACTED] that two black males with "dreads" shot him, just before he was sedated. Mr. Stone died in surgery.

On 02-01-15 at around 0951 hours, Kansas City Missouri Police Officer (KCPD) Jerry Richardson was dispatched to the area of 43<sup>rd</sup> St. and Pittman Rd. Kansas City, Missouri 64133 regarding a vehicle crash involving a gray 2006 Chevrolet Impala, bearing Kansas temporary tag of A745164. The temporary tag was registered to Mr. Craig L. Brown. Officer Richardson identified the driver as Mr. Craig L. Brown black male born 06-25-1991 who exited the driver's door. Officer Richardson contacted the passenger identified as Mr. [REDACTED] black male born 09-09-1994. Both Subjects were arrested for outside warrants. Officer Richardson inventoried the vehicle for tow and a handgun was located in the glove box. The handgun (black Glock 19 semi automatic pistol, bearing serial number SAS41) was secured at KCPD as evidence.

On 06-25-15 at around 1700 hours, Detective Kimberly Anderson with KCPD stated the said handgun was sent to the KCPD crime lab to be test fired. Detective Anderson stated the handgun produced a hit with the National Integrated Ballistic Information Network (NIBIN). The NIBIN hit matched the gun used to kill Mr. Stone.

Through our investigation we learned the handgun was purchased at Smart Pawn in Kansas City, Missouri on 03-03-12. The purchaser of the said handgun was Ms. [REDACTED] white female born 06-22-1999 who listed her address at 5 [REDACTED] Harvard Ave. Raytown, Missouri 64133. Our investigation revealed Ms. [REDACTED] was the girlfriend of Mr. [REDACTED] black male born 05-02-1985 and they were living at the Harvard Ave. address. Currently Ms. [REDACTED] is living in the Minneapolis, Minnesota area and Mr. [REDACTED] is in federal prison.

On 07-01-15 at around 1000 hours, Detective Jimmy Wolsey and Detective Vernon Huth with the KCPD Career Criminal Unit and found that Mr. Brown had been driving a dark blue Pontiac Grand Prix, bearing VIN 2G2WP552881159804, during the time Mr. Stone was killed. We learned the car belonged to Brown's girlfriend at the time identified as [REDACTED] black female born 05-29-1990. Mr. Brown had been stopped by both the Raytown Police and KCPD driving the said Pontiac Grand Prix a few months before and after the homicide. The vehicle was located at County Line Auto Parts in Kingsville, Missouri to be crushed. The Pontiac Grand Prix matched the description of the vehicle shown in the

surveillance video recovered the day of the murder. The video was recovered at the BP gas station located at 6701 Blue Ridge Blvd. Raytown, Missouri. The vehicle was towed back to the Raytown Police Department tow lot and held as evidence.

On 07-07-15 at around 0933 hours, Detectives Wolsey and Anderson conducted a voluntary interview with Ms. [REDACTED] at [REDACTED] Minneapolis, Minnesota. Special Agent Algren with the St. Paul, Minnesota Alcohol Tobacco and Firearms (ATF) was present during the interview. During the interview Ms. [REDACTED] confirmed she purchased the handgun for her safety at the time she lived with Mr. [REDACTED] in Kansas City, Missouri. She stated she lived in Kansas City from about March, 2012 until July of 2012. She stated Mr. [REDACTED] was sitting in her vehicle as she purchased the handgun. Ms. [REDACTED] stated Mr. [REDACTED] did not enter Smart Pawn because he was felon. Ms. [REDACTED] stated during her time in Kansas City she was "drunk and high" most of the time and everything was "foggy" and did not remember ever meeting anyone other than Mr. [REDACTED] family members. Ms. [REDACTED] stated there were many people unknown to her in and out of their house and the handgun would be laying out. She said one day the gun was missing from inside the house. She stated she did not know who had possession of the handgun.

On 07-14-15 at around 1719 hours, Detectives Wolsey and Huth conducted a voluntary interview with Ms. [REDACTED]. Ms. [REDACTED] was able to identify her vehicle after looking at a still photograph taken from the security camera at the BP gas station. Ms. [REDACTED] stated during the time of the murder she would let Mr. Brown drive her vehicle when he would "serve" (sell drugs) people. She also stated Mr. Brown was normally armed and the gun appeared to look like my Police issued handgun, a black Glock 9mm handgun. Ms. [REDACTED] also stated Mr. Brown is known to many as "CJ."

On 07-21-15 at around 0845 hours, Detective Wolsey conducted a voluntary interview with Mr. [REDACTED] black male born 05-02-1985. The interview took place in the Florence, Colorado Federal prison located in Florence, Colorado. During the interview Mr. [REDACTED] indicated that he knew who killed the "jogger" from Raytown. He said the information he could provide would solve the case. Detective Wolsey concluded the interview after Mr. [REDACTED] would not provide anymore information.

On 08-12-15 at around 1130 hours, Detectives Wolsey and Huth conducted a voluntary interview with Mr. Brown outside his home. Detective Wolsey informed Mr. Brown that he was not in custody and could end the conversation anytime. Mr. Brown stated at the time of the murder he was driving Ms. [REDACTED] dark colored Pontiac Grand Prix. Detective Wolsey showed Mr. Brown a still photograph of the vehicle at the time of the murder. Mr. Brown looked at the photograph and stated the vehicle in the photograph was [REDACTED] car. Mr. Brown did not provide any further information.


On 08-21-15 at around 1015 hours, Detectives Wolsey and Huth conducted a voluntary phone interview with Mr. [REDACTED] while he was being housed at the Florence, Colorado Federal prison. Mr. [REDACTED] stated he knew who killed Mr. Stone. The phone interview cut short and no information was provided by Mr. [REDACTED]

On 08-25-15 at around 1500 hours, Detectives Wolsey and Huth conducted a second voluntary phone interview with Mr. [REDACTED]. Mr. [REDACTED] initially stated during the conversation that he sold a gun to someone (Craig Brown) and 3 days later the same person contacted him, informing him that the handgun was "hot" and he needed to sell it back to Mr. [REDACTED]. At the end of the interview Detective Wolsey asked Mr. [REDACTED] if he showed him a picture of the person who killed Mr. Stone. Mr. [REDACTED] said "yeah", it's one of those people you showed me." Detective Huth asked Mr. [REDACTED] if "CJ" was the person Detective Wolsey showed him. Mr. [REDACTED] responded by saying "that's it!" Mr. [REDACTED] did not provide any further information before the prison staff ended the phone call.

On 09-29-15 at around 1100 hours, Detectives Wolsey and Huth conducted a third phone interview with Mr. [REDACTED] stated he would tell us who killed Mr. Stone. No further information was given during the phone call.

On 11-13-15 at around 0800 hours, Detectives Wolsey and Huth conducted a voluntary interview with Mr. [REDACTED] inside the Lewisburg, Pennsylvania prison located in Lewisburg, Pennsylvania. During the interview Mr. [REDACTED] stated "CJ did it." Mr. [REDACTED] stated at around the time of his birthday on 05-02-12 he needed money. He said he reached out to a friend he only identify as "Snake bite." He stated "Snake bite" was able to find someone to purchase the handgun. Mr. [REDACTED] stated he met up with "CJ" off of Truman Road in the Northeast neighborhood of Kansas City, Missouri. He stated he observed that "CJ" arrived in a "dark colored sedan." Mr. [REDACTED] stated he sold the gun to "CJ." He described "CJ" as having "dreds" at the time of the transaction. Mr. [REDACTED] stated "CJ" approached him a second time asking if he would buy his gun back because his gun was now "hot." He said "CJ" was accompanied by a large "dark skinned" black male unknown to Mr. [REDACTED] Mr. [REDACTED] remembered "CJ" pulled a gun out on a person he only knew as "Rusty." Mr. [REDACTED] stated that "CJ" pulled the gun out and said to "Rusty", "go ahead and run and I will catch you bouncing out of your Nike's." Mr. [REDACTED] stated "CJ's" unknown friend that arrived with stated that "CJ" already "popped a motherfucker," the gun was hot!" Mr. [REDACTED] stated he had a friend get shot in the area of Charlie Parker Square and asked "CJ" who he shot. He said "CJ" stated "Just some square motherfucker in Raytown." Mr. [REDACTED] stated he asked "CJ" if he scratched the serial number off the handgun and they parted ways.

Name Jimmy Wolsey

Signature: 

THE COURT FINDS PROBABLE CAUSE:

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Judge