

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

Police# 16-001750
Prosecutor# 095431555
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Brandon Jones Webster
4909 Queens Ridge
Kansas City, MO 64136
DOB: 06/12/1989; Race/Sex: B/M;
SS# [REDACTED]
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 April 20, 2016, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. Currency in the possession of [REDACTED] 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 April 20, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count I, 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.

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.

Brandon Jones Webster

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,



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

[REDACTED]

[REDACTED]

[REDACTED]

PO Stefany Jones , 1200 Main Street, Grandview, MO 64030

[REDACTED] , , ,

SGT Justin Rigot , 1200 Main Street, Grandview, MO 64030

DET Alan Walker , 1200 Main Street, Grandview, MO 64030

GRANDVIEW STATEMENT OF PROBABLE CAUSE

April 20, 2016

I, Alan Walker, 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 at 13920 S US 71 Hwy, Grandview, Jackson County, Missouri, JONES WEBSTER, BRANDON (B/M 06/12/1989) (SS# [REDACTED]) committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 04-20-2016 at 0143 hours Officer Murphy was in the area of 13920 S US 71 Hwy when he was advised of an armed robbery which just occurred at the gas station ther. As he exited 140th Street and immediately observed a gold Ford Explorer bearing a MO temp tag, later found to be 01BG9B, traveling East on 140th Street away from the gas station. Officer Murphy observed that the vehicle then went North on the East Outer Road and got onto northbound I-49. Officer Murphy observed that the vehicle had two occupants and there were no other vehicles in the area. Officer Murphy began to follow the vehicle north on I-49 when dispatch then advised that the suspects went north on I-49 in a Ford Bronco.

Officer Jones arrived at the business and contacted [REDACTED] [REDACTED] [REDACTED] stated as he and the other clerk, identified as [REDACTED] were helping customers at the counter, a "lighter skinned black male with a grey hoodie, with the hood up and flat bill cap" walked around the counter and came up onto the register floor, stood behind [REDACTED] and pulled a black and silver hand gun out of his hoodie pocket, holding it out and pointing it to the ground. The suspect then told [REDACTED] to "get the money out" pointing to the register. [REDACTED] handed the suspect the cash that was in his drawer and the suspect put the money into his pocket. [REDACTED] also emptied his cash register out and handed the suspect the money. After both [REDACTED] and [REDACTED] gave the suspect the money, the suspect put the handgun back into his pocket and walked out of the business. [REDACTED] began to follow the suspect outside. The suspect observed [REDACTED] walking out the door and stopped in the parking lot displayed the handgun again and [REDACTED] retreated back inside the business. When the suspect continued, [REDACTED] exited the business and called Police. [REDACTED] observed the suspect walk north behind the fence line towards the apartments. [REDACTED] stated he stayed back in the parking lot after the suspect was out of view. Shortly after losing sight of the suspect, [REDACTED] heard what sounded like a car door shutting and then observed a silver in color SUV pull out of the apartments and travel south on the West Outer Rd.

[REDACTED] stated the suspect was a black male with a grey hoodie and a flat bill cap. [REDACTED] advised he did not get a "great" look at the suspect and could not give a description of the handgun as the suspect was standing behind him. [REDACTED] handed the suspect the money from the register and stayed inside the business as the suspect left.

Officer Jones recovered the flash drive video surveillance and released it to Detective Walker. The total loss was shown to be \$1008 in cash

Officer Murphy followed the vehicle which exited I-49 onto Main Street, got into the middle lane, and continued north on the East Outer Road, north of Main Street. Office Murphy then observed that the passenger of the vehicle leaned his head out of the window in the area of 129th Street and the East Outer Road. Officer Murphy suspected at that time that it was possible that evidence was discarded. Officer Murphy followed the vehicle and he was informed over the radio that other officers were at Harry Truman Drive and the East Outer Road and to attempt to stop the suspect vehicle. Officer Murphy activated his overhead lights at Harry Truman Drive and the East Outer road. The suspect vehicle went north on the East Outer Road through the red light. Officer Murphy activated his siren and began to pursue the suspect vehicle. The suspect vehicle continued north on the East Outer Road accelerating to approximately 80 miles per hour until it reached Blue Ridge Blvd. The suspect vehicle then went west on Blue Ridge Blvd and accelerated to approximately 80 miles per hour. During this time, Officer Murphy observed that the streets were wet and it was raining, but little to no traffic encountered. The suspect

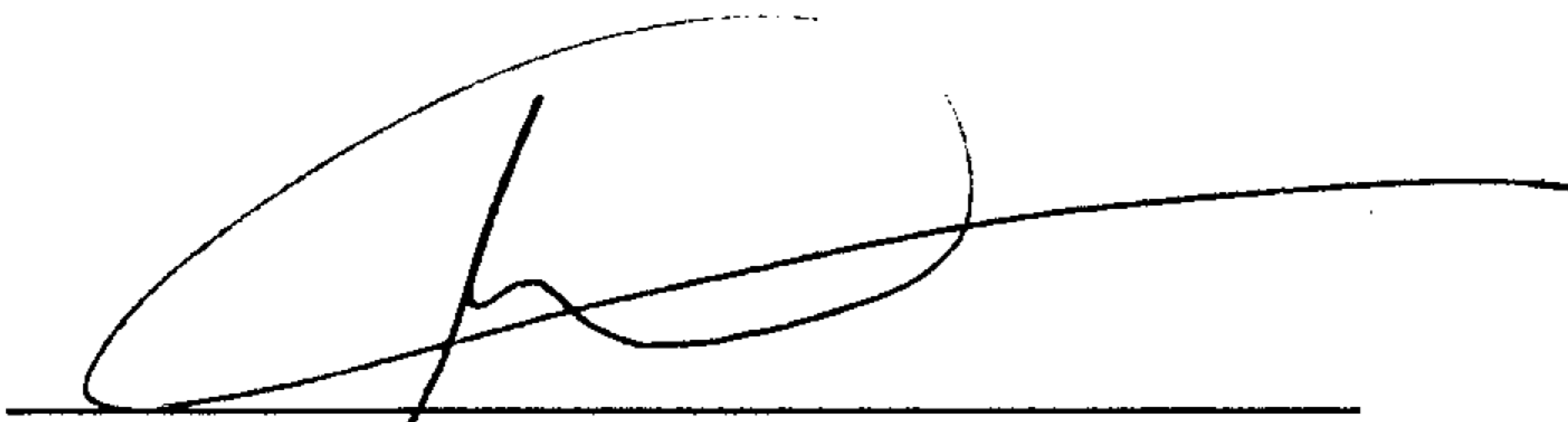
(ATTACH ADDITIONAL SHEET(S) IF NEEDED)

vehicle continued to flee west on Blue Ridge Blvd at approximately 12100 block. The vehicle then spun around of out control until it was facing East, the vehicle then drove through the grass, westbound and drove over a curb. The suspect vehicle then got back onto Blue Ridge Blvd where it fled east on Blue Ridge Blvd. The suspect vehicle accelerated to approximately 80- 90 miles per hour driving through the West Outer Road until it reached the East Outer Road. The suspect vehicle then spun out of control and struck the right concrete barrier at the East Outer Road and Blue Ridge Blvd. then crashed into a light pole with significant damage.

Dickens, Diyante b/m 12-22-89 exited from the driver's side. Dickens was placed in handcuffs behind the back and secured in the back of patrol car 2014-2. Officers then approached the vehicle and observed the other suspect to be in the back of the vehicle, unresponsive but breathing with obvious injuries. The party was later identified as Jones Webster, Brandon b/m 6-12-89. Jones was left where he was due to possible injuries. EMS responded. Officer Murphy checked Jones Webster for weapons, Officer Murphy observed that Jones Webster had a large amount of loose bills in both of pants' pockets. The bills were removed and placed in the vehicle. EMS transported Jones Webster to Research Hospital and Officer Breuall followed. Officer Murphy observed that Dickens began to make noises while shaking. EMS was then called to respond. EMS then escorted Dickens was also transported to Research Hospital and Officer Carter followed. Large amounts of money were observed around and inside the vehicle. An inventory was conducted. \$1049, was recovered from the vehicle. The bills were found in the back hatch area that were previously removed from Jones's pocket, in the front seats and floorboards, and the middle row. A SCCY 9mm silver, black handgun was recovered from under the middle row seat. The gun was found to have a round in the chamber and a round in the magazine. An additional 9mm round was found in the back hatch area loose where Jones was found.

Detective Walker met with [REDACTED] [REDACTED] at police headquarters, freeman viewed a photo lineup including Jones Webster and positively identified Jones Webster as the armed robber. [REDACTED] gave a similar account of the events of the robbery. Detective Walker interviewed [REDACTED] who also gave a similar account as given to Officer Jones. [REDACTED] stated he did not get a look at the robber's face.

Jones Webster has criminal history to include a felony conviction for Possession of a Controlled Substance Burglary 1st degree and Domestic assault 2nd degree. He sis currently on parole



DETECTIVE

THE COURT FINDS PROBABLE CAUSE.

JUDGE

DATE

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

Police# 16-001750
Prosecutor# 095431556
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Diyante Dickens
13873 E. 35th St. Ct.
Independence, MO 64055
DOB: 12/22/1989; Race/Sex: B/M;
SS# [REDACTED]
[REDACTED].

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 April 20, 2016, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with another, forcibly stole U.S. Currency in the possession of [REDACTED], and in the course thereof the defendant or another participant in the crime 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 April 20, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count I, 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. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20054899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the class D felony of resisting an arrest, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about April 20, 2016, in the county of Jackson, State of Missouri, P.O. Murphy, a law enforcement officer, was making an arrest of defendant that the officer was making an arrest, and, for the purpose of preventing the officer from effecting the arrest, resisted the arrest of defendant by fleeing from the officer and the defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that the defendant drove at high speeds and failed to obey traffic signals.

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 two (2) years 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 five thousand dollars (\$5,000); or by both imprisonment and a fine.

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

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Diyante Dickens

JEAN PETERS BAKER

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Jackson County, Missouri
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Michael J. Hunt (#34818)
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[REDACTED]

[REDACTED]

[REDACTED]

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Officer Jones arrived at the business and contacted [REDACTED], who stated a "lighter skinned black male with a grey hoodie, with the hood up and flat bill cap" walked around the counter and came up onto the register floor, stood behind the other clerk, [REDACTED] and pulled a black and silver hand gun out of his hoodie pocket, holding it out and pointing it to the ground. The suspect then told [REDACTED] to "get the money out" pointing to the register. [REDACTED] handed the suspect the cash that was in his drawer and the suspect put the money into his pocket. [REDACTED] also emptied his cash register out and handed the suspect the money. After both [REDACTED] and [REDACTED] gave the suspect the money he walked out of the business. [REDACTED] followed the suspect. The suspect observed [REDACTED] and stopped in the parking lot displayed the handgun again and Freeman retreated. When the suspect continued, Freeman followed and called Police. [REDACTED] saw the suspect walk north behind the fence line. Shortly after losing sight of the suspect, Freeman heard what sounded like a car door shutting and then observed a silver in color SUV pull out of the apartments and travel south on the West Outer Rd. [REDACTED] stated the suspect was a black male with a grey hoodie and a flat bill cap. Officer Jones recovered the flash drive video surveillance and released it to Detective Walker. The total loss was shown to be \$1008 in cash.

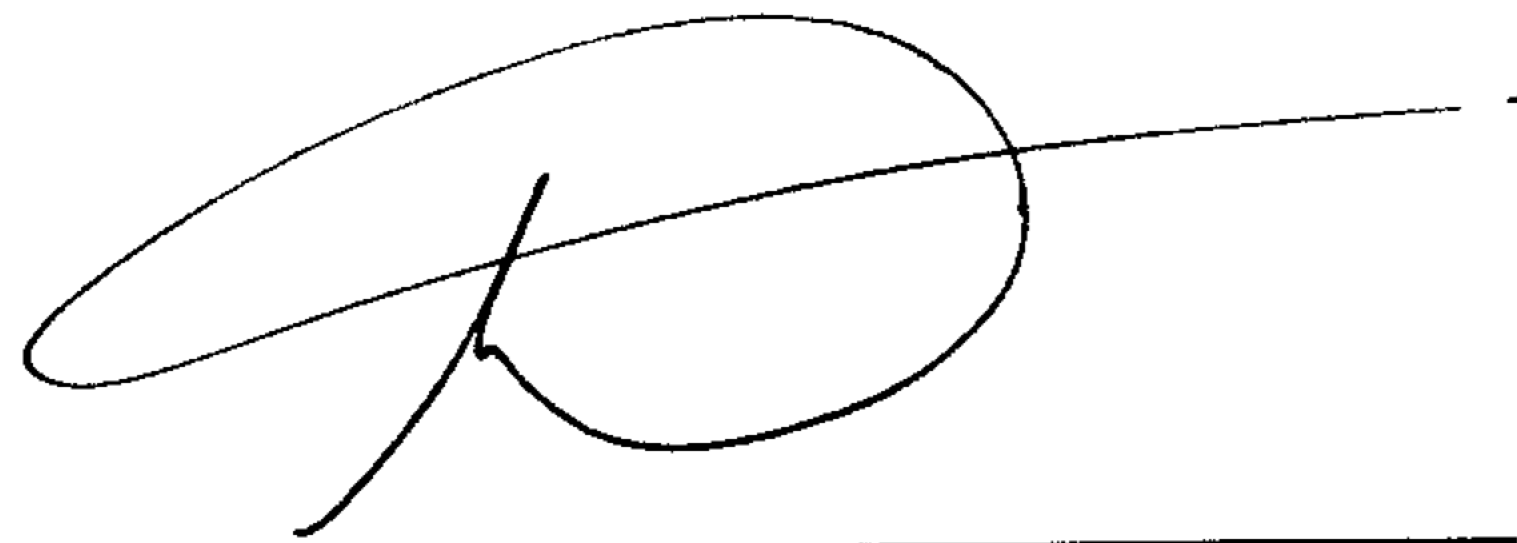
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Detective Walker observed the surveillance video which showed a BM in a light grey hooded sweatshirt, dark grey sweat pants and a bill of a cap was visible the suspect is shown displaying a gun and collecting cash from both clerk. Detective Walker met with [REDACTED] [REDACTED] at police headquarters; [REDACTED] viewed a photo lineup including Jones Webster and positively identified Jones Webster as the armed robber. [REDACTED] gave a similar account of the events of the robbery. Detective Walker interviewed [REDACTED] who stated he did not get a look at the robber's face. Dickens has a criminal history to include Tampering with a Motor Vehicle. Dickens is on Parole.



DETECTIVE

THE COURT FINDS PROBABLE CAUSE.

JUDGE

DATE