

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

Police# 11-059140
Prosecutor# 095359262
116-CR03744
OCN# B2063109

COMPLAINT
(Refile)

STATE OF MISSOURI

vs.

Victor D. Vickers Jr.
5020 Manchester Ave.
Kansas City, MO 64129
DOB: 04/15/1985; Race/Sex: B/M;
SS# [REDACTED]
Defendant.

Count I. Murder 1st Degree (10021110)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 565.020, RSMo, in that on or about August 16, 2011, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, after deliberation, knowingly caused the death of Edward Ewing by shooting him, and the defendant is further given notice that should the State submit murder in the second degree –felony under Section 565.021.1(2) RSMo, it will be based on the death of Edward Ewing as a result of the class B felony of Attempted Robbery in the First Degree under Section 569.020 RSMo, committed by the defendant, either acting alone or purposefully in concert with another.

Count II. Armed criminal action (31010990)

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 August 16, 2011, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another committed the felony of Murder in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant or another committed the foregoing felony of Murder in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

THE STATE OF MISSOURI

vs.

Victor D. Vickers Jr.**Count III. Assault 1st degree - serious physical injury (13011040)**

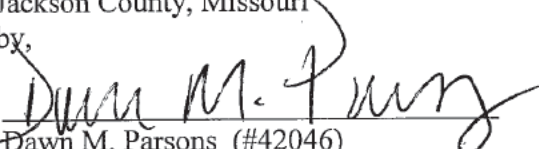
The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the class A felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about August 16, 2011, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, shot [REDACTED], and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED]

Count IV. Armed criminal action (31010990)

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 August 16, 2011, in the county of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another committed the felony of Assault in the First Degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant or another 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 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 BAKERProsecuting Attorney
Jackson County, Missouri
by,
Dawn M. Parsons (#42046)
Assistant Prosecuting Attorney
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Kansas City, Missouri 64106
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PROBABLE CAUSE STATEMENT FORM

Date: 8-19-2011CRN: 11-059140I, Det. Danny Phillips #3781

(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 8-16-2011, at 7001 E. 85th Terrace in
(Date) (Address)Kansas City, Jackson Missouri Victor D. Vickers & Garron T. Briggs
(County) (Name of Offender(s))BM, 4-15-85 & BM, 1-1-86 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 8-16-2011, 0108 hours, officers of the Kansas City Missouri Police Department responded to 7001 E. 85th Terrace, Kansas City, Jackson County, Missouri in regard to a shooting. On arrival officers located **Edward L. Ewing, BM, 5-3-86** and **[REDACTED], BF, 5-28-86** inside the residence both having sustained gunshot wounds. Ewing was pronounced dead at the scene and Forbush was transported to an area hospital where she was treated for gunshot wounds sustained in the attack.

[REDACTED] stated got off work and drove to her residence, 7001 E. 85th Terrace, in the early morning on 8-16-2011. **[REDACTED]** stated just before arriving at her residence she observed a vehicle parked down the street with its parking lights on. **[REDACTED]** stated she pulled into her driveway, exited her vehicle and as she did she observed the vehicle with the parking lights on pull up in front of her residence. **Victor D. Vickers, BM, 4-14-85, Garron T. Briggs, BM, 1-1-86** and a third subject exited this vehicle and approached her. Forbush stated Vickers held a handgun at his side. Forbush stated the father of her child **Edward L. Ewing, BM, 5-3-86** was alone inside her residence asleep and that he planned to get up early and go to work. **[REDACTED]** stated Vickers, Briggs and the third subject forced her to unlock the front door of her residence at which time they forced her inside into her living room as Briggs held his hand over her mouth in order to keep her silent. **[REDACTED]** stated Briggs ordered her to lie on her living room floor at which time she complied. **[REDACTED]** stated she could now see that Briggs also held a handgun in his hand as he stood next to her in the living room. **[REDACTED]** stated Vickers and the third subject walked down the hallway out of her sight toward her and Ewing's bedroom. **[REDACTED]** stated she heard male voices ordering Ewing to tell them where the "stuff" was. **[REDACTED]** stated she could hear Ewing telling the males that he (Ewing) didn't have anything and that he (Ewing) didn't sell drugs. **[REDACTED]** stated she heard Vickers and the third subject searching her residence. **[REDACTED]** stated either Vickers or the third subject approached Briggs in the living room and told him they couldn't find what they were looking for. **[REDACTED]** stated Briggs instructed this male to "do it" at which time she observed the male respond back toward the bedrooms. **[REDACTED]** stated Briggs pointed his handgun in the direction of her head and shot her once. Briggs stated she observed the muzzle flash from Briggs firearm at which time she felt a burning pain in her neck. Forbush stated she laid her head on the living room floor and kept silent in hope that Briggs would not shoot her again. Forbush stated she heard two more gunshots fired from the direction of bedrooms where she knew Ewing

PROBABLE CAUSE STATEMENT FORM

CRN 11-059140

Vickers and the third subject to be, a brief pause and then several more gun shots from the same direction. [redacted] stated Briggs, Vickers and the third subject fled her residence at which time she called 911 from a cell phone kept in her pant pocket. [redacted] stated she crawled to her infant daughter's nursery room where she located Ewing's lifeless body sitting up against a wall. [redacted] stated it was apparent Ewing had been shot multiple times. [redacted] stated she remained with Ewing until emergency personnel arrived on scene.

A single spent shell casing and a large pool of blood was located on the living room floor where [redacted] reported Briggs shooting her. Multiple spent shell casings were located in near proximity of Ewing's body. During autopsy it was determined Ewing was shot multiple times.

Both Vickers and Briggs turned themselves into the police in the company of their respective attorney's. Both Vickers and Briggs exercised their right to remain silent.

Printed Name Det. Danny Phillips #3781 Signature _____

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.