

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

Police# 16-055240
Prosecutor# 095433541
1616-CR
OCN# C0051007

COMPLAINT

STATE OF MISSOURI

vs.

Brian K. Morrow
4232 Paseo Blvd.
Kansas City, MO 64110
DOB: 05/24/1962; Race/Sex: B/M;
SS# [REDACTED]
Defendant.

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 July 29, 2016, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Isaiah Jones caused the death of Isaiah Jones by stabbing 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.

Count II. Armed Criminal Action (571.015-001Y19755212.0)

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 July 29, 2016, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, 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 dangerous instrument, on or about January 6, 2000, in the Circuit Court of Jackson County, Mo, the defendant was convicted of the offense of armed criminal action.

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 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.

Brian K. Morrow

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Trisha Lacey (#55710)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, Missouri 64106
TLacey@jacksongov.org

WITNESSES:

[REDACTED]

DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106

DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106

DET Cristin Stammmler, 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

PROBABLE CAUSE STATEMENT FORM

Date: 07/30/2016

CRN: 16-055240

I, Det. Brent Taney #4641
(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 07/29/2016, at 30th Terrace and College Avenue in
(Date) (Address)

Kansas City, Jackson County Missouri Brian K. Morrow
(County) (Name of Offender(s))

B/M, 05/24/1962 committed one or more criminal offense(s).
(Description of Identity)

Murder 2nd Degree

ACA

The facts supporting this belief are as follows:

On 07/29/2016 at 2136 hours, Officers of the Kansas City Missouri Police Department were dispatched to 30th Terrace and College Avenue, Kansas City Jackson County Missouri in regard to reported cutting. Upon arrival, Officers discovered the victim wounded from an apparent stabbing. Responding Officers attempted to give the victim CPR until KCFD Medics arrived and declared the victim deceased at the scene.

Witness #1 and witness #2 stated they were present when the homicide occurred and witnessed the homicide. Witness #1 stated the victim and suspect were engaged in a verbal argument about when the Police could stop and detain a person. Witness #1 stated they were all in the suspect's vehicle on their way to a drive-in movie when the victim told the suspect to drop them off at 31st Street and College. The suspect drove to the area of 30th Terrace and College, stopped his vehicle and the victim exited the rear driver's side door. The victim and suspect continued to argue and the victim threatened to beat up the suspect. Witness #1 stated she heard the suspect mention something about stabbing the victim and observed the suspect exit the driver's side door of the suspect's vehicle. Witness #1 stated the victim struck the suspect with his fist, knocking the suspect down to the ground. Witness#1 stated she observed the suspect get back to his feet and stabbed the victim at least two times in the chest area. Witness #1 stated she did not see the knife but observed the victim bleeding from his chest after the altercation. Both witnesses responded over to the victim, used his shirt and a towel to apply pressure to the victim's wounds. Witness#1 stated she called 911 from her cellular phone and observed the suspect drive away from the scene by himself in his yellow Nissan Xterra. Witness #1 stated she has been dating the suspect for a couple of years and identified him as "**Kelly**" Morrow.

Witness #2 stated she was riding in the back seat of the suspect's vehicle when the victim and suspect were engaged in a verbal argument about police authority. Witness #2 stated the victim told the suspect to take them back to 31st Street and College and drop them off. Witness #2 stated once they arrived at 30th Terrace and College, the victim and suspect were involved in a physical altercation on the street when the suspect stabbed the victim in the chest. Witness #2 stated just before the physical altercation, she overheard the suspect say, "I'm gonna cut him". Witness #2 stated she did not see the victim get stabbed but observed him bleeding from the

PROBABLE CAUSE STATEMENT FORM

CRN 16-055240

chest after the altercation. Witness #2 stated she and witness #1 attempted to apply pressure to the victim's injuries until police arrived. Witness #2 stated the suspect left the scene in a yellow truck.

Both witnesses were shown a single photograph of **Brian K. Morrow, B/M, 05/24/1962**. The witnesses both identified **Morrow** as the person who was fighting the victim and stabbed him.

On 07/30/2016, a body exam was conducted on the victim and revealed the victim had two puncture wounds to the chest, a large laceration wound to the left forearm and a puncture wound to the lower left back.

On 07/30/2016, **Brian K. Morrow, B/M, 05/24/1962** was taken into custody and transported to Police Headquarters, 1125 Locust. Prior to any questioning, **Morrow** was advised of his Miranda rights. **Morrow** stated he understood his rights and signed the Miranda Waiver. Upon questioning, **Morrow** stated he had been advised by his attorney not to talk.

Printed Name DET. BRENT TANEY #464 Signature DET. BRENT TANEY #464

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

Judge

Circuit Court of _____ County, State of Missouri.