

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

Police# 16-061048
Prosecutor# 095434212
1616-CR
OCN# C0051426

COMPLAINT

STATE OF MISSOURI

vs.

**Darrell K. Roberson Jr.
222 E. Washington #A
Belton, MO 64012
DOB: 04/13/1988; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Abuse Or Neglect Of A Child - Serious Emotional Or Physical Injury (568.060-004Y20123899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.060, RSMo, committed the class A felony of abuse of a child, punishable upon conviction under Section 558.011 and 568.060.5(1), RSMo, in that on or about August 18, 2016, in the County of Jackson, State of Missouri, the defendant was eighteen years of age or older, and acting either alone or in concert with Roselynn Kuntz, knowingly caused [REDACTED] (DOB 06-26-2014), a child less than eighteen years of age, to suffer physical injury as a result of abuse by shooting a gun in close proximity to [REDACTED] and the injury inflicted was serious physical injury on [REDACTED]

Count II. Endangering The Welfare Of A Child Creating Substantial Risk - 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20033899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class C felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about August 18, 2016, in the County of Jackson, State of Missouri, the defendant, acting either alone or in concert with Roselynn Kuntz, knowingly acted in a manner that created a substantial risk to the life and body

and health of [REDACTED] (DOB 06-26-14), a child less than seventeen years old, by conducting a drug sale within a vehicle in which [REDACTED] was present.

The range punishment for a class C 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 seven (7) 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. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

**Count III. Endangering The Welfare Of A Child Creating Substantial Risk - 1st Degree -
1st Offense - No Sexual Conduct (568.045-005Y20033899.0)**

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The range punishment for a class C 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 seven (7) 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. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

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.

Darrell K. Roberson Jr.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Lauren D. Barrett

Lauren D. Barrett (#62062)
Assistant Prosecuting Attorney
415 E. 12th St., Floor 7M
Kansas City, Missouri 64106
(816) 881-3527
lbarrett@jacksongov.org

WITNESSES:

PO Jernisha Cann, 1125 Locust, Kansas City, MO 64106
PO Donna M. Drake , 5301 E. 27th Street, Kansas City, MO 64127
PO Danielle M. Kincaid , 1125 Locust, Kansas City, MO 64106
DET Darin K. Penrod , 1125 Locust, Kansas City, MO 64106

PO Christopher S. Smith , 1125 Locust, Kansas City, MO 64106
DET Jeremy D. Wells , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08-21-2016

CRN: 16-61048

I, Detective Darin Penrod #4288 Kansas City, MO Police Department
(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 08-18-2016, at 2600 E. Gregory Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Darrell K. Roberson
(County) (Name of Offender(s))

B/M, 04-13-1988 SSN # [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08-18-2016 at approximately 2007 hours, officers of the Kansas City, Missouri Police Department were dispatched to the area of Gregory Blvd and Prospect Ave on a reported shooting. Upon arrival, a deceased male was observed lying next to a van in the parking lot of the Church's Chicken at 2600 E. Gregory Blvd. Darrell K. Roberson, BM, 04/13/1988 and his girlfriend, Roselynn S. Kuntz, WF, 09/15/1990 were contacted at the scene. They were both suffering from non-life threatening gunshot wounds and were each transported to local hospitals to receive treatment. Victim #1, a two year old female, was transported to a local hospital with a gunshot wound to the head and was listed in critical but stable condition. Victim #2, a three year old female, was uninjured.

On 08/20/2016, Darrell Roberson responded to Police Headquarters and provided a formal statement to detectives after being advised of his rights per Miranda. He stated that on 08/18/2016, he, Kuntz and their two juvenile children, a two year old female (Victim#1) and a three year old female (Victim #2) responded to the Church's Chicken parking lot at 2600 E. Gregory in their Chevrolet van. Roberson admitted he went there to sell a pound of marijuana to an individual he only knew as "D". Roberson stated there were two loaded handguns in his van which he described as a SCCY 9mm and a Taurus .40 caliber. Roberson advised he was originally seated in the front passenger seat of the van, Kuntz was in the driver's seat, the two year old female was in the seat right behind him and the three year old female was in the seat right behind Kuntz. When he arrived, Roberson had "D" sit in the front passenger seat and he moved to the rear seat of the vehicle. "D" then produced a handgun and demanded money. Roberson lunged forward and pushed "D's" handgun down and was subsequently shot in the shoulder. Roberson stated he had the SCCY 9mm and fired one shot but did not believe he hit "D". Roberson stated Kuntz then shot "D". He was uncertain where "D" was struck. After the shooting ended, he discovered his two year old daughter had been shot in the head. Roberson stated he had his children with him because he did not have a babysitter.

Roselynn Kuntz, WF, 09/15/1990 was initially interviewed by police detectives on 08/18/2016. At that time she admitted she had driven Roberson to Church's Chicken so he could sell a friend some marijuana. She further admitted there were two firearms in their vehicle. On 08/20/2016, detectives obtained a formal statement from

PROBABLE CAUSE STATEMENT FORM

CRN 16-61048

Kuntz after advising her of her rights per Miranda. During this interview, she stated they had driven to the Church's Chicken to get some food for their children and then sat in their van in the parking lot to eat. Roberson moved to the rear seat to help the children with their meals. Kuntz stated she then heard Roberson on the phone giving directions to an unknown individual. A few minutes later a male subject arrived in a white car and parked next to their van. Kuntz stated Roberson told her to wave the male over to their vehicle, so she did. Kuntz stated the subject entered her vehicle and sat in the right front seat previously vacated by Roberson. As soon as the male entered the vehicle he removed a large plastic bag of marijuana from the front of his pants. He then produced a silver handgun and said something to the effect of "Don't move, give me all your shit". Kuntz stated the male began shooting at Roberson. Roberson then lunged from the back of the van and struggled over the handgun with this male. As shots were being fired, she noticed her two year old daughter was stuck in the head. During this struggle, Roberson dropped his handgun Kuntz stated she picked up the gun and shot the male. She was uncertain how many times she fired the weapon or where she struck this male.

A 2006 Chevrolet Uplander registered to Kuntz was searched at the scene after she signed a Consent to Search for this vehicle. Three firearms were recovered from the vehicle including a SCCY 9mm handgun and a Taurus .40 caliber handgun. A large amount of apparent marijuana was recovered inside the vehicle and one large bag of apparent marijuana was recovered on the ground next to this vehicle.

Printed Name Det. Darin Penrod #4288

Signature



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# 16-061048
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STATE OF MISSOURI

vs.

**Roselynn S. Kuntz
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Belton, MO 64012
DOB: 09/15/1990; Race/Sex: B/F;
SS# [REDACTED]
Defendant.**

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Printed Name Det. Darin Penrod #4288

Signature



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

Judge

Circuit Court of _____ County, State of Missouri.