

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

Police# 16-061385
Prosecutor# 095434372
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Victor R. Nevels
11015 Herrick Ave.
Kansas City, MO 64134
DOB: 12/03/1986; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

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 August 19, 2016, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another with the purpose of causing serious physical injury to Keenon Durham caused the death of Keenon Durham 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.

Count II. Armed Criminal Action (571.015-001Y19755213.0)

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 August 19, 2016, 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 second degree charged in Count One, 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 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about August 19, 2016, at 5711 Manchester Ave., in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another, knowingly discharged a firearm at a habitable structure, a residence located at 5711 Manchester Ave, Kansas City, Missouri and, as a result of the above described conduct, Keenon Durham suffered injury or death.

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 IV. 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 August 19, 2016, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another committed the felony of unlawful use of a weapon charged in Count Three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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 V. 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 19, 2016, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another, knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED], a child less than seventeen years old, by discharging a firearm multiple times into the bedroom the child was located.

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 BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
415 E. 12th Street, Fl 7M
Kansas City, Missouri 64106
(816) 881-4592
jbaldwin@jacksongov.org

WITNESSES:

DET Selvir Abidovic , 1125 Locust, Kansas City, MO 64106

[REDACTED]

DET Michael R. Buente , 1125 Locust, Kansas City, MO 64106

PO Steven Cisneros , 1125 Locust, Kansas City, MO

DET Chason C. Crowell , 1125 Locust, Kansas City, MO 64106

Keenon A. Durham , Prosecuting Atty. Office, Kansas City, MO 64106

[REDACTED]

DET Jamie M. Frates , 1125 Locust, Kansas City, MO 64106

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

DET Daniel A. Porter , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08/24/2016

CRN: 16-61385

I, Detective Daniel Porter #5382, of the Kansas City, Missouri 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 08/19/2016, at 5711 Manchester Ave in
(Date) (Address)

Kansas City, JACKSON Missouri Victor R. Nevels
(County) (Name of Offender(s))

R:B S:M DOB: 12/03/1986 SOC: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08/19/2016 at 2101 hours Officers of the Kansas City, Missouri Police Department were dispatched on shooting at 5711 Manchester Ave, Kansas City, Jackson County, Missouri. Upon arrival they found victim #1 inside a residence at that location suffering from apparent gunshot injuries. Victim #1 was declared dead at the scene.

Officers contacted victim #2 who advised victim #1 and victim #4, her youngest son, where in the southwest bedroom. Victim #2 was in the kitchen when she heard at least 4 gun shots. She observed victim #4 run out of his bedroom and say "Daddy, daddy". She took him to the other bedroom and advised her other son and nephew, victims #'s 5 and 6, to lie on the floor. Victim #2 went to the living room and looked through a window. From the window she observed, the suspect/ the father of her children, Victor R Nevels B/M 12/03/86, running from the side of the residence and towards his vehicle. Victim #2 opened the front door and observed an unknown black male, short, wearing dark clothing, standing by a red Chevrolet Impala SS. Nevels and the unknown male entered the vehicle and drove by her residence as they fled the scene. She went back inside the residence and located victim #1 lying on the floor, with several gunshot wounds. Victim #4 advised her he saw his father, Nevels, shooting with a gun.

Victim #3 stated she was visiting victim #2, and her children. Victim #1 arrived at the residence and she went outside to grab something from her vehicle. As she was approaching her vehicle she observed Nevels driving by the house in a red, newer model, Chevy Impala. She observed a black male front passenger but she did not get a good view of him. She immediately went back inside after she observed the Chevy Impala drive by the house. She stated about 10 minutes later she was in the living room while victims #1 and #4 were in a bedroom. She heard about 4-5 sounds of gun shots and she could smell the gun powder coming from the bedroom. She responded to the bedroom to check the welfare on everyone. When she opened the bedroom door, she observed victim #1 falling to the ground. From the view of the bedroom window, she observed Nevels "retreating" away from the house. Victim #3 stated she has been friends with victim #2 since childhood. She has spent time with Nevels in the past but she did not "really know him." Victim #3 was able to positively ID Nevels in a six person line up.

Officers observed the window on the side of the residence leading into the bedroom, severely damaged and broken out. Officers also observed the blinds on the interior to be closed on the window but also damaged. On the ground they located three spent shell casings around the immediate area of the window.

PROBABLE CAUSE STATEMENT FORM

CRN 16-61385

Nevels was taken in custody at a later date. He was contacted by detectives and read his Miranda Warning. **Nevels** stated he did not wish to talk with detectives.

Printed Name Detective Daniel Porter #5382 Signature Det P- 5382

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

Judge

Circuit Court of _____ County, State of Missouri.