

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

Police# 15-087860
Prosecutor# 095431423
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Brandon M. Johnson
LKA: 11215 Marsh Ave
Kansas City, MO 64134
DOB: 08/17/1987; 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 December 6, 2015, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Marlon Hill caused the death of Marlon Hill 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 December 6, 2015, in the county of Jackson, State of Missouri, the defendant 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.

PROBABLE CAUSE STATEMENT FORM

Date: 3/18/2016

CRN: 15-087860

I, Det. Wayne Fitzner 3685
(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 12-6-2015, at 2212 E. 85th Street in
(Date) (Address)

Kansas City, Jackson Missouri Brandon Maurice Johnson, BM, 8-17-1987
(County) (Name of Offender(s))

SSN# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 12-6-2015 at 0530 hours, Kansas City, Missouri Police Officers were dispatched to 2212 E. 85th street on a shooting. Upon arrival they found Marlon Hill, BM, 8-15-1986 on the ground lying on his stomach with apparent bullet wounds. Hill was transported to Research Hospital where he later died from his wounds. The Jackson County Medical Examiner declared Hill's death a murder due to a gunshot wound. The investigation revealed that a few hours prior to the shooting Hill had been inside his girlfriend's residence (2212 E. 85th street) accompanied by his girlfriend, the girlfriend's children and a roommate. At one point during the evening the roommate called Brandon Johnson to come over to the house and sometime later he arrived. A witness stated she observed Johnson sitting in the living room along with Hill, Hill's girlfriend and the person who called him to come over. The witness also said that Johnson was holding a big gun with a curved magazine in it on his lap. At one point during the evening Hill and his girlfriend got into an argument and the girlfriend told Hill to leave. Witnesses stated that Hill and his girlfriend walked outside together still having a verbal argument. Hill started his white Charger that was parked in the drive way then continued to argue with his girlfriend. At this point witnesses state Johnson came out of the house with a gun and started to argue with Hill. During the argument Johnson pointed the gun at Hill at least 2 times then shot him and fled the scene in a light colored Jeep Renegade driven by a female. No witnesses place a gun in Hill's possession at any time and no firearm was found near Hill. A 7.62x39 caliber Micro Draco Assault pistol loaded with a long curved magazine was found on the shoulder of the road directly across the street from where Hill was shot. Witnesses say a cousin of Hills started shooting at Johnson and possibly the vehicle he was fleeing in and may have wounded somebody who was running from the scene. A blood trail was found leading away from the scene.

On 12-7-2015 at about 0200 hours, Kansas City Police were dispatched to meet fire department personnel on a burning vehicle located at 150 Highway and Prospect. The vehicle was identified as a Jeep Renegade rented from Budget Rentals. The person who rented it reported it stolen on 12-7-2015 at about 1800 hours. When interviewed she admitted that she had rented the Jeep November 30th, 2015 for Brandon Johnson to use. She said that Johnson had arrived at her residence on 12-6-2015 at about 0600 hours having been dropped off at the house by someone she didn't know in a white unknown type Mitsubishi car. When he arrived he received a 3-way phone call from a person she knew as "Shadi" and another person she didn't know. They were talking about a shootout on 85th street. They talked about having to take care of the Jeep because it had blood all over it and was

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all shot up. Johnson wanted to try and fix it but the others talked him out of it. Later that evening around mid-night Johnson received a call from the unknown person who had been in the earlier 3-way conversation saying that the Jeep was taken care of. She asked Johnson what she should do and he told her to report the Jeep stolen.

Printed Name Wayne Fitzner Signature Wayne Fitzner 3485

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

Judge

Circuit Court of _____ County, State of Missouri.