

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

Police# 16-094360
Prosecutor# 095436817
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Jewell A. Jones Jr.
5077 Glenside Dr.
Kansas City, MO 64129
DOB: 09/22/1999; Race/Sex: B/M;
SS# [REDACTED]
Defendant.

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

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 16, 2016 in the County of Jackson, State of Missouri, Warren Banks was killed by being shot as a result of the perpetration of the **Class B Felony of Attempted Robbery in the First Degree** under Section 569.030, RSMo committed by the defendant on or about December 16, 2016, in the County of Jackson, State of Missouri.

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 16, 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 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. Robbery 1st Degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 569.020 and 564.011, RSMo, committed the **class B felony of Attempted Robbery in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 16, 2016, in the County of Jackson, State of Missouri, the defendant demanded property in the possession of Warren Banks and [REDACTED] while displaying and threatening the use of what appeared to be a deadly weapon.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. 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 16, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree, charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Attempted Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, 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 December 16, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] 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 VI. 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 16, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree, charged in Count V, all allegations of which are incorporated herein by reference, and the defendant 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 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 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.

Jewell A. Jones Jr.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

Katherine Baker Nelson (#62733)
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WITNESSES:

Warren E. Banks, Prosecuting Atty. Office, Kansas City, MO 64106

DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106

DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 12-11-2016

CRN: 16-94360

I, Det. Joe Nelson #4964
(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 12/16/2016, at 7701 E 52nd St in
(Date) (Address)

Kansas City, Jackson Missouri Jewell A. Jones Jr.
(County) (Name of Offender(s))

B/M 09/22/1999; SSN [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 12/16/2016 at approximately 1734 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 7701 E. 52nd St. on a reported outside disturbance with a weapon. While enroute the call was updated that two victims suffering from gunshot wounds had arrived at a local hospital. Victim #1 was declared deceased at the hospital.

The Jackson County Medical Examiner's Office ruled the death a homicide.

On 12/16/2016, detectives processed the crime scene and recovered three spent 9mm Luger shell casings from the street.

Victim #2 stated he had been riding with victim #1, when victim #1 received a text message from the suspect (later identified as **Jewell A. Jones Jr B/M 09/22/1999**) who wanted to buy some marijuana from victim #1. Victim #1 drove to the area of 7701 E. 52nd St. to meet the suspect. Upon arriving he observed the suspect to be sitting on the hood of a car. The suspect then approached the vehicle he was in with victim #1, and got into the back passenger seat. While the suspect was in the back seat he produced a handgun and attempted to rob them, yelling "Give me your shit. Victim #1 reached into the back seat and a struggle ensued. The suspect then fired off approximately three shots into the air. As the struggle continued the suspect began firing more shots, shooting him in the leg and also shooting Victim #1. The suspect then fled the scene on foot. He then climbed over victim #1 and sat on him in the driver's seat and drove to the hospital. Victim #2 stated that while the suspect was in the back seat he introduced himself using the name of something similar to Jewell or Jules. Victim #2 also stated he nor victim #1 had a firearm.

On 12/19/2016 witness #1 stated that on 12/16/2016 at about 1725 she received a phone call from a person she knows as **Jones**. **Jones** told her that he needed her to pick him up and take him home. She then drove to the area of Eastwood Hills Elementary School in the area of 52nd and Palmer (5290 Sycamore) and picked up **Jones**. **Jones** stated to her, "I think I shot somebody". She then drove him to his cousin's house in the area of 47th and Sterling. While driving **Jones** to his cousin's house he informed her there were two people in the front seat of the vehicle. He stated the two people began moving around in the front seat and it made him scared. He

PROBABLE CAUSE STATEMENT FORM

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pulled out his gun and one of the people in the front seat leaned towards him and he began shooting. He did not relay any additional information on the homicide. It should be noted the time of the phone call to her, it was placed close to the same time as the Homicide and the location of where she picked Jones up was close in proximity to where the Homicide occurred.

Witness #2 stated she owns a 9mm semi-automatic handgun. Witness #2 stated she discovered her firearm missing from the residence she shares with her son, Jones. She reported it stolen to KCPD on 12-06-2016.

On 12/17/2016, detectives processed the victim's vehicle. Detectives observed a bullet hole going in a downward direction in the rear seat of the vehicle. Additionally, detectives observed a bullet hole going in a downward direction in the floorboard area of the rear seat of the vehicle. Detectives recovered and spent 9mm shell casing from inside the vehicle. There were no firearms or ammunition recovered from the vehicle.

On 12/19/2016, detectives received the call detail records from Jones's cell phone number. In the call detail records, detectives observed a phone call from victim #1 to Jones on 12/16/2016 at 1715 hours. Jones then called victim #1 at 1718 hours.

On 12/21/2016, Jones was arrested and transported to police headquarters for questioning. Jones was advised of his Miranda Rights via the Miranda Waiver Form. Jones signed the Miranda Waiver form and indicated he was willing to talk to the police. Jones initially denied any knowledge in regard to the homicide. He stated he was not in the area when it happened. Jones eventually admitted he was involved in the homicide. He stated he arranged to buy marijuana from the victim. The victim and an unknown black male pull up to the arranged location (crime scene). Jones got into the back passenger side seat. Jones began asking for 40.00 dollars' worth of marijuana. As he was getting the money out of his sock he heard the two people in front talking. He did not hear what they were saying. He looked up and saw the driver turning towards him with a gun. He said he then drew his gun and shot first. He stated he exited the vehicle then threw his gun back in the vehicle. Jones stated he brought a handgun with him.

Printed Name Det. Joe Nelson #4964 Signature *Det Nelson 4964*

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

Judge

Circuit Court of _____ County, State of Missouri.