

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

POLICE NO. :	17-019986
PROSECUTOR NO. :	095438611

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
ROBERT J. TOWNSEND)	
8017 E 88th Street,)	CASE NO. 1716-CR
Kansas City, MO - 64138)	DIVISION
DOB: 04/11/1986)	
Race/Sex: B/M;)	
SSN: ██████████)	
)	DEFENDANT.

COMPLAINT

Count I. 565.020 - 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 on or about March 20, 2017, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Marquis A Clark caused the death of Marquis A Clark 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 March 20, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the 2nd degree as charged in Count I, all allegations of which are incorporated here by reference, and the defendant

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committed the foregoing felony of Murder in the 2nd 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. 565.020 - 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 on or about March 20, 2017, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Shakeisha D. Urassa caused the death of Shakeisha D. Urassa by shooting her.

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 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 March 20, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the 2nd degree as charged in Count III, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Murder in the 2nd 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.

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**Count V. Assault 1st Degree Or Attempt –
Serious Physical Injury Or Special Victim (565.050-001Y19841304.0)**

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 March 20, 2017, 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 March 20, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the 1st degree as charged in Count V, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Assault in the 1st 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.

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JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ P. Benjamin Cox

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[REDACTED]
[REDACTED]
DET Scott M. Emery , 1125 Locust, Kansas City, MO - 64106

DET Thomas M. Hammond , 1125 Locust, Kansas City, MO - 64106

[REDACTED]
DET Scott P. Mullen , 1125 Locust, Kansas City, MO - 64106

PO James R. Oakes , 1125 Locust, Kansas City, MO - 64106

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

[REDACTED]
DET Brent R. Taney , 1125 Locust, Kansas City, MO - 64106

DET Daniel G. Thomas , 1125 Locust, Kansas City, MO - 64106
[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 03/21/2017

CRN: 17-019986

I, Detective Danny Thomas #4933
(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 03/20/17, at Blue Parkway and Bennington in
(Date) (Address)

Kansas City, Jackson Missouri Robert J. Townsend
(County) (Name of Offender(s))

black male, 04/11/1986 committed one or more criminal offense(s).
(Description of Identity)

Two counts of Murder
Aggravated Assault
FIP
ACA

The facts supporting this belief are as follows:

On 03/20/2017 at approximately 2225 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 6710 Blue Parkway in regard to an injury accident. While enroute the Officers were advised by dispatchers of a shooting at the Relax Inn located at 6300 Blue Parkway which was possibly related to the call.

Officers discovered victim #1 in the lobby of the Relax Inn. Victim #1 was suffering from an apparent gunshot wound. He advised officers he had been shot in a car down the street and everyone was dead. He was transported to an area hospital with non-life threatening injuries.

Other Officers arrived to the area of Blue Parkway and Bennington Avenue where they observed EMS Personnel on scene treating a female (witness). They further observed the brake lights of a vehicle approximately 100 yards down a hill in a heavily wooded embankment. The Officers responded to the vehicle (1998 Tan Ford Windstar minivan) and discovered victim #2 and victim #3 inside, deceased from apparent gunshot wounds.

Another group of Officers responded to the area of Blue Parkway and Bennington Avenue to assist in securing the crime scene when they encountered a nude black male, wearing only a pair of socks. The Officers believed the party to be under the influence of PCP because he was nude, balling up his fists and flexing his muscles. The party was eventually taken into custody and identified as **Robert J. Townsend**, black male, 04/11/1986.

During her interview the witness stated an individual she knows as Jerell (Townsend's middle name) was inside the minivan. She stated she was seated in the front passenger seat. Jerell and victim #3 were free-style rapping when an argument ensued between the two. Victim #3 slapped Jerell's hand and the witness subsequently heard gunshots from behind her, inside the vehicle. The minivan then drove off the roadway into a field. The witness exited the vehicle walked around the driver side and observed victim #2 and victim #3 unresponsive. She ran towards the street and eventually was contacted by EMS Personnel. The witness thought Jerell or victim #3 must have been shooting.

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During an interview of victim #1 he stated he was seated in the back of the minivan when the shooting occurred. He stated victim #3 and Jerell were arguing over rap music when Jerell started shooting. Victim #1 was struck in the abdomen and the vehicle crashed. Victim #1 stated he took the gun away from Jerell, threw it in the bushes near the minivan and ran to a nearby hotel for help.

During the course of the investigation a person claiming to be the mother of Townsend called the Homicide Unit and asked if her son was one of the deceased individuals inside the minivan. The woman stated her son's middle name was Jerell and he was last seen inside a blue van. She also described Townsend as having tattoos all over and wearing a blue sweat shirt and blue jeans.

During a death notification, family members of victim #2 informed detectives they last saw her in her minivan on 03/20/2017 between the hours of 2000 and 2200 hours. They stated she was with an individual they know as "Relo". They described him as having several tattoos on his body to include tears on his face. The family members were transported to Police Headquarters where they viewed a photo lineup consisting of six black males similar in appearance with Robert Townsend in the #4 position. One of the family members identified Townsend as the individual they saw leaving with victim #2. They also reported seeing Relo with a handgun earlier in the day.

During his interrogation Townsend confessed to being in the minivan with four other individuals. He further admitted he was in possession of a gun and stated he shot because he heard shots. He also admitted to being nude when contacted by Police Officers.

It should be noted there was no evidence to support Townsend's assertion of shots being fired at the minivan nor did anyone else state there were shots fired at them from outside the vehicle.

Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

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

Judge

Circuit Court of _____ County, State of Missouri.