

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

<b>POLICE NO. :</b>	16-081570
<b>PROSECUTOR NO. :</b>	095438580

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>JUAN J. BRAVO-LEON</b>	)	
<b>1825 Jackson Avenue,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64127</b>	)	<b>DIVISION</b>
<b>DOB: 07/05/1992</b>	)	
<b>Race/Sex: W/M;</b>	)	
<b>SSN: XXXXX</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**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 on or about October 30, 2016, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Andres Garcia-Jimenez caused the death of Andres Garcia-Jimenez 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 (571.015-001Y19755299.0)**

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 October 30, 2016, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant

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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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

**Count III. 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 October 30, 2016, in the County of Jackson, State of Missouri, the defendant shot at Andres Garcia-Jimenez, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of Andres Garcia-Jimenez, and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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 in [REDACTED] 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 October 30, 2016, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault 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 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

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of three (3) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

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,

*/s/ Bryan O. Covinsky*  
Bryan O. Covinsky (#47132)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

DET Bonita Y. Cannon , 1125 Locust, Kansas City, MO - 64106  
DET Jason C. Findley , 1125 Locust, Kansas City, MO - 64106

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
DET Heather D. Leslie , 1125 Locust, Kansas City, MO - 64106  
DET William R. Martin , 1125 Locust, Kansas City, MO - 64106  
DET Joe A. Nelson , 1125 Locust, Kansas City, MO - 64106  
DET Nicholas A. Sola , 1125 Locust, Kansas City, MO - 64106  
DET Timothy R. Taylor , 1125 Locust, Kansas City, MO - 64106  
DET Nathan S. VanVickle , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 04-11-2017

CRN: 16-081570

I, Detective Bonita Y. Cannon, #4585 (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 10-30-2016, at 6900 Executive Drive in (Date) (Address)

Kansas City, Jackson Missouri Juan Jesus Bravo-Leon (County) (Name of Offender(s))

W/M 07-05-1992 committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows:

On 10-30-2016 at 0312 hours officers of the Kansas City, Jackson County, Missouri Police Department were dispatched to area of 6900 Executive Drive in regard to sounds of shots.

Upon their arrival a male was found on the ground in the parking lot of Palmeras Night Club, 6900 Executive Drive. KCFD responded and confirmed the victim deceased at 0337 hours. The Jackson County Medical Examiner ruled the victim's death as a homicide, as a result of gunshot wounds.

Witness #1 stated he, witness #2-3 and the victim were together at the club. At some point the victim and Bravo-Leon, bumped into each other inside of the bar and argued. After the witnesses and victim left the club, while in the parking lot preparing to leave, Bravo-Leon approached the victim. Bravo-Leon told the victim, "I'm not a toy". The victim told Bravo-Leon to "Chill out". Bravo-Leon fired a shot into the ground with anochrome colored handgun.

Witness #1 stated Bravo-Leon tried to fire it twice more, but the gun malfunctioned. Bravo-Leon then shot the victim in the chest at close range. Witness #1 stated the victim, uttered, "I've been hit", as the victim raised his shirt, holding his injury. Witness #1 stated Bravo-Leon left the scene.

Witness #2 stated while he, the victim, witness #2 and #3, were inside of the bar, the victim told witness #2 that Bravo-Leon intentionally bumped into the victim. The victim told the witnesses it was time to go because Bravo-Leon was starting trouble. Witness #2 stated later while in the parking lot, Bravo-Leon approached with a few other unknown subjects and witness #4. Witness #2 stated Bravo-Leon and the victim argued. At some point the victim uttered, "What's up", to Bravo-Leon, at which time Bravo-Leon and his group, along with witness #4, all started hitting the victim.

Witness #2 stated he tried to help his brother, the victim. Before he could do, so Bravo-Leon pulled out an silver colored handgun and uttered, "You don't get in this" and fired one round in the ground at witness #2's feet.

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Witness #2 stated after the **Bravo-Leon** fired at his feet, the victim, stepped in between witness #2 and **Bravo-Leon**. The victim told **Bravo-Leon**, his problem was with him (victim) and to leave witness #2 alone. **Bravo-Leon** then shot the victim before leaving the scene.

Witness #3 stated he, witness #1-2, and the victim were at the club. He was not aware there were any issues. As they were approaching their vehicle to leave, a group of four to six subjects approached them saying, "What's up", in an aggressive type tone. The victim and witness #1 were inside of their vehicle. Witness #2 and 3 were getting into the vehicle. **Bravo-Leon** and those with him were arguing with witness #2 and #3. The victim and witness #1 exited the vehicle. The victim got in between **Bravo-Leon** and witness #2. Witness #3 stated the victim grabbed witness #2 to prevent witness #2 from fighting with the **Bravo-Leon**. **Bravo-Leon** then shot the victim.

While at the scene a red sleeveless jacket with an "Ohio State" emblem on the front with a cell phone in one of the pockets was recovered. A court order for the cell phone was obtained, at which time social media outlets, were conducted of the cell phone number. Searching Facebook revealed a username of "JuanJesus BravoLeon". While looking at the same Facebook page, a photograph of a male wearing a red Ohio State sleeveless jacket was observed.

On 01-20-2017 detectives were able to determine **Bravo-Leon** identifiers. On 01-23-2017 witness #1 and #2 positively identified **Bravo-Leon** from a photographic lineup as the person who shot and killed the victim.

On 02-14-2017 victim #2 was contacted and escorted to Police Headquarters. Victim #2 stated he allows his wife, witness #4, to have an intimate relationship with **Bravo-Leon**. Victim #2 stated on 10-30-2016, late in the evening, he was at home while witness #4 and **Bravo-Leon** were at Palmeras. Victim #2 stated he arrived at Palmeras at approximately 0200 hours. As victim #2, witness #4 and **Bravo-Leon** were leaving Palmeras, he heard gunshots. He left the scene in his vehicle with **Bravo-Leon**. Witness #4 followed in her vehicle.

Victim #2 stated while driving, he realized he had been shot, and stopped the vehicle. Victim #2 stated witness #4 allowed **Bravo-Leon** to drive her vehicle. Victim #2 stated he and witness #4 then drove Truman Medical Center. Victim #2 stated they later sold witness #4's vehicle.

Victim #2 positively identified **Bravo-Leon** from a photographic lineup, as being at Palmeras the night the victim was shot and killed.

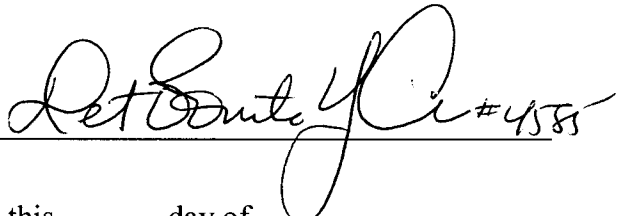
On the night the victim was killed, witness #4 was initially contacted at TMC. Witness #4 stated to detectives she was not aware of any issues at Palmeras and did not know who shot her husband, victim #2. At that time detectives were unable to obtain a statement from victim #2 due to his injuries. On 02-14-2017 witness #4 was contacted and immediately requested and attorney. Witness #4 did not provide a statement.

On 04-11-2017 at 0930 hours detectives responded to 11125 N. Ambassador Drive to contact **Bravo-Leon** in regard to this investigation. At 1015 hours **Bravo-Leon** was advised of his Miranda Rights via the Miranda Waiver. **Bravo-Leon** waived his right to counsel and agreed to speak with detectives. He signed the Miranda Waiver at 1018 hours.

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**Bravo-Leon** stated he was at Palmeras with witness #4, victim #2 and two other males. Bravo-Leon stated he was given a handgun by victim #2 and Cocaine to sell at Palmeras. Bravo-Leon stated later as they were approaching their vehicle to leave, he observed a group of three or four males approaching them. Bravo-Leon stated he did not know why, but they engaged in a physical altercation. At some point during the fight, his jacket was pulled off of him. **Bravo-Leon** stated he pulled out a silver colored semi-automatic handgun, fired one round into the ground to get everyone away from him. **Bravo-Leon** stated the victim approached him, at which time he accidentally shot the victim once. **Bravo-Leon** further stated he then fired four shots into the air, before leaving the scene. **Bravo-Leon** stated he gave the handgun back to the owner, victim #2. **Bravo-Leon** also stated the red "Ohio State" jacket found at the scene, the cell phone recovered from the jacket, and the off white rock like substance located inside of the jacket belonged to him.

Printed Name Det. Bonita Y. Cannon, #4585 Signature 

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

\_\_\_\_\_

Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.