

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

POLICE NO. :	17-029539
PROSECUTOR NO. :	095439135

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
SIRJOHN T. WHITE)	
4341 Monroe Ave.,)	CASE NO. 1716-CR
Kansas City, MO - 64128)	DIVISION
DOB: 11/11/1996)	
Race/Sex: B/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about April 25, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, forcibly stole a cell phone and money in the possession of [REDACTED], and in the course thereof defendant was armed with a deadly weapon.

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 April 25, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, committed the felony of robbery in the first degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of robbery in the first degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

State vs. Sirjohn T. White

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) 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. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about April 25, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, forcibly stole a cell phone and money in the possession of [REDACTED], and in the course thereof defendant was armed with a deadly weapon.

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 April 25, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, committed the felony of robbery in the first degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of robbery in the first degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

State vs. Sirjohn T. White

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) 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/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St. Floor 7M
Kansas City, MO - 64106
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KNBryant@jacksongov.org

WITNESSES:

██
██

DET Michael R. Buente , 1125 Locust, Kansas City, MO - 64106
DET Anthony L. Castelletto , 1125 Locust, Kansas City, MO - 64106
DET Todd A. Dolato , , , -
DET Robert A. Maser , 1125 Locust, Kansas City, MO - 64106

State vs. Sirjohn T. White

PO Quentin Neal , 1125 Locust, Kansas City, MO - 64106

Shell Gas Station , 2200 E. Truman Road, Kansas City, MO - 64127

DET Dawn N. Wilson , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/25/2017

CRN: 17-29539

I, Detective, Michael Buente 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 04/25/2017, at 2200 E Truman Road in
(Date) (Address)

Kansas City, Jackson Missouri SirJohn T. White
(County) (Name of Offender(s))

R:B S:M DOB:11/11/1996 SS# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Armed Robbery
Unlawful Use of a Weapon
Aggravated Assault

The facts supporting this belief are as follows:

On 04/25/2017 at 0029 hours Officers of the Kansas City, Missouri Police Department were patrolling in the area of Truman Rd and Brooklyn Ave when they observed several individuals running away from the Shell Gas Station located 2200 E Truman Road, Jackson County, Kansas City, Missouri. The victims then came out of the store and waived down the officers. The victims informed the officers that they had been robbed.

The suspects then entered a gold SUV and were fled the scene at high rate of speed. When the vehicle was leaving, the suspect, later identified as SirJohn T. White B/M 11/11/1996, fell out of the rear hatch. Officers pursued White to a post office, located at 2201 E Truman Road. White then climbed a brick wall and officers lost sight of him. Officers set up a perimeter and where waited for additional officers to respond. During the search for White, officers were informed by the victims that the suspects had taken their cellular phones and they were tracking the phones to the back parking lot of 2201 E Truman Road. Officers instructed the victims to sound the alarms on their phones. Once the alarms were activated, officers heard the alarms coming from a trash dumpster that was located in the back parking lot. Officers located the cell phones near the trash dumpster. Officers then looked inside the trash dumpster where they located White hiding behind some boxes. As White was removed from the dumpster and a black handgun fell from his waistband and money fell from his pockets. A total of \$268.00 dollars was recovered from White.

Officers then responded back and contacted the victims. Victim #3 stated White and another suspect both armed with handguns entered the store and approached the counter. The suspects told him and Victim #2 to handover their cellphones and to get on the ground. Victim #3 then opened the cash register and as he was opening the register, White struck him in the face with his handgun. White then kicked Victim #3 and demanded for more money. Three more suspects then entered the store and came to the counter with one being armed with an AK-47 hidden under his jacket. White took the money from the register and then all the suspects exited the store. Victim #3 and Victim #2 walked outside after the suspects left and observed police officers chasing White. Victim #3 confirmed to the officers the suspect that they were chasing was the same one that assaulted him.

PROBABLE CAUSE STATEMENT FORM

CRN 17-29539

White was arrested and transported to Jackson County Detention for questioning. **White** was read his Miranda Rights from the Miranda Form. **White** signed the Miranda Form and agreed to speak with detectives. **White** admitted walking into the gas station with a handgun and taking money from the cash register. When **White** was questioned about the other suspects, **White** stated he no longer wanted to speak with the detectives.

Printed Name Detective Michael Buente Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.