

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

<b>POLICE NO. :</b>	17-067956
<b>PROSECUTOR NO. :</b>	095440667

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>JOHN A FRAZIER</b>	)	
<b>3705 Woodland Ave,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64127</b>	)	<b>DIVISION</b>
<b>DOB: 09/28/1981</b>	)	
<b>Race/Sex: B/M;</b>	)	
<b>SSN: XXX-XX-████</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2nd Degree (565.021-001Y19840901.0)**

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 August 2, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Tamara Randolph 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 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 August 2, 2017, 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

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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. 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/ Christopher Accurso*  
Christopher Accurso (#66899)  
Assistant Prosecuting Attorney  
415 E. 12th St. 11th Floor  
Kansas City, MO - 64106  
CAccurso@jacksongov.org

**WITNESSES:**

DET Selvir Abidovic, 1125 Locust, Kansas City, MO - 64106  
DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO - 64106  
DET Jason C. Findley, 1125 Locust, Kansas City, MO - 64106  
PO Jonathan A. Hall, 1125 Locust, Kansas City, MO - 64106  
DET Heather D. Leslie, 1125 Locust, Kansas City, MO - 64106

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Sherita McMillon, 14705 Grand Summit Blvd, Grandview, MO - 64030

DET Joe A. Nelson, 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

DET Nathan S. VanVickle , 1125 Locust, Kansas City, MO - 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 08/03/2017

CRN: 17-067956

I, Detective Nathan VanVickle, 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 08/02/2017, at 3705 Woodland Ave. in  
(Date) (Address)

Kansas City, Jackson Missouri Frazier, John A.  
(County) (Name of Offender(s))

B/M, 09/28/1981, SSN: [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

**Homicide**

**Armed Criminal Action**

On 08/02/2017 at approximately 1458 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 3701 Woodland on a reported shooting, where the calling party, **John Frazier** stated a female pulled a gun on him and he shot her.

Upon arrival Officers observed the victim to be lying on the ground face down with a phone and a hand gun lying on the ground around her. They then observed the glass of the north door to the residence to be broken out and gave verbal commands to the suspect **John A. Frazier B/M 09/28/1981**, to come out with his hands up. **Frazier** complied with Officers and was taken into custody without incident. EMS responded to the scene and confirmed the victim to be dead.

Detectives from the 990, Homicide Squad responded to the scene to investigate along with Crime Scene personnel.

While processing the scene Detectives observed the victim to be lying face down in the driveway of 3705 Woodland Ave. and there to be a Cobra .380 hand gun to be by her on the ground near where she was lying along with a cell phone lying on the ground, and keys in her left hand. The Cobra .380 had 6 rounds in the magazine and no round in the chamber. The rounds were marked with the head stamp "RP". Detectives observed what appeared to be 3 gunshot wounds in the victim's back, 2 gunshot wounds in her chest, and 2 gunshot wounds in her right arm. As the scene continued to be processed surveillance cameras were observed on the outside of the residence. The video surveillance system was recovered as evidence. A CCY 9mm was recovered from the kitchen of the residence. One 9mm spent shell casing was recovered from the back porch, and 3 spent 9mm shell casings were recovered from inside the residence in the kitchen. Live .380 rounds head stamped "RP" and live 9mm rounds were recovered from inside the residence in what was identified as **Frazier's** bedroom. Detectives also located a note on the outside of the north door of the residence asking **Frazier** to let her have the kids back so she could get them ready for school and to get their shots.

The victim was transported to the Jackson County Medical Examiner's Office for examination.

Detectives responded to the Kansas City, Missouri Police Departments Crime lab to review the video on the surveillance system that was recovered. On the video it shows the victim arriving at 3705 Woodland Ave. at

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approximately 1433 hours and she parks on 37<sup>th</sup> St. She then walks up to the residence and begins to knock on the north rear door. She then goes around to the front of the house where there are no cameras. The victim again comes back to the north rear door, and again begins to knock on the door. As she is knocking on the door it appears that she is on the phone. She then goes back to the front of the house where there are no cameras, and at approximately 1450 hours **Frazier** arrives at the residence in a silver Dodge Charger and parks in the driveway. **Frazier** gets out of the vehicle and begins to walk along the north side of the residence towards the front of the house where the victim was last seen walking to. As **Frazier** is walking he is holding what appears to be a gun in his right hand. **Frazier** then goes around the corner to the front of the house where there are no cameras. **Frazier** then come back around the corner to the north side of the residence back into camera view and begins to walk back towards the back of the residence. As **Frazier** is approaching the rear of the residence he appears to look up towards the cameras and then the cameras go black and stop recording at approximately 1451 hours. During the investigation Shot spotter information was received for the area of 37th and Woodland for the date of 08/02/2017. Shot Spotter reported to have picked up 7 sounds of shots at 14:54:27. It should be noted that the 911 call came in at 14:57:10 hours on 08/02/2017. Technicians from the Digital Evidence Section advised that the camera system was powered off at the time of recovery and appeared to have been unplugged.

Detectives then contacted the victim's sister, [REDACTED] B/F 01/07/1984, who stated the following: She had received a call from the victim at approximately 1437 hours but she did not answer the phone. She then got a call from her other sister [REDACTED] telling her that the victim said **Frazier** pulled a gun on her. She then called the victim and was on the phone with her. She stated that she could hear **Frazier** trying to get her to come into the house but she was not going into the house. She also heard the victim yell her kids' names that were staying inside the house. She then heard what she could best describe as a struggle and then she could not hear anything. She stayed on the phone trying to get her sister to talk and then heard the sirens and heard who she believed were officers talking. She stated that the victim had gone to **Frazier's** in an attempt to get her kids back that **Frazier** had taken two months ago and not returned them.

Detectives then contacted [REDACTED] B/F 10/20/1985 who stated the following: She received a call from the victim telling her that she was at **Frazier's** house trying to get her kids back. She stated the victim had told her that **Frazier** was not there. While she was on the phone with the victim, the victim told her that **Frazier** had just arrived. She stayed on the phone with the victim and heard the victim say something to the effect of "so you're going to pull a gun on me". She asked the victim if she wanted her to call 911 and she told her no. The victim then hung up the phone and she called her sister [REDACTED] to tell her what she had heard and then called 911.

**Frazier** was transported to Police Headquarters for questioning. Upon being advised of his Miranda Rights, **Frazier** advised that he wanted an attorney.

Printed Name Det. Nathan VanVickle #5169 Signature Det. [Signature] #5169

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

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Judge

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