

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

<b>POLICE NO. :</b>	17-091339
<b>PROSECUTOR NO. :</b>	095442212

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>JOSEPH M. PARKER</b>	)	
<b>3435 Walround Ave.,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64108</b>	)	<b>DIVISION</b>
<b>DOB: 06/24/1981</b>	)	
<b>Race/Sex: B/M;</b>	)	
<b>SSN: XXX-XX-XXXX</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2nd Degree (565.021-001Y19840904.0)**

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 23, 2017, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Lovell J. Smith caused the death of Lovell J. Smith by repeatedly striking 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 (571.015-001Y19755212.0)**

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 23, 2017, 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 committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

**State vs. Joseph M. Parker**

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/ Bryan O. Covinsky  
Bryan O. Covinsky (#47132)  
Assistant Prosecuting Attorney  
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Kansas City, MO - 64106  
(816) 881-3368  
BCovinsky@jacksongov.org

**WITNESSES:**

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

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

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

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

Lovell J. Smith, Prosecuting Atty. Office, Kansas City, MO - 64106

**State vs. Joseph M. Parker**

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

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

**PROBABLE CAUSE STATEMENT FORM**

Date: 11/01/2017

CRN: 17-91339

I, Detective Hobart Price #5254  
(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 10/23/2017, at 3610 Roberts St in  
(Date) (Address)

Kansas City, Jackson Missouri Joseph M. Parker, black, male, 06/24/1981  
(County) (Name of Offender(s))

6'00", 250, Black, Brown, SSN: [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 10/24/17 at approximately 1436 hours, Officers of the Kansas City, Missouri Police Department were dispatched to Roberts and Askew in Kansas City, Jackson County, Missouri in regard to a medical nature unknown. The call was later updated to a deceased party in the alleyway.

Upon arrival the officers located the victim in the alley. The victim was deceased from apparent severe head trauma, consistent with multiple impacts. The victim's death was ruled a homicide.

During the course of the investigation, detectives collected surveillance video from the alley. A portion of the video depicts a silver colored vehicle entering a driveway in the rear of 3618 Roberts. Moments later the victim is seen walking westbound in the alley towards the area he was eventually found dead. Another portion of the video depicts the suspect walking westbound from the rear of 3618 Roberts carrying a pry bar. Another male (witness) is seen walking behind the suspect a short distance behind. The witness stops for a short time, then turns quickly and walks eastbound back towards 3618 Roberts, where he disappears behind the residence. A short time later the suspect walks eastbound in the alley away from where the victim was discovered. The suspect is still carrying the pry bar and he bends over and wipes the prybar off in the grass. The silver colored vehicle is then observed leaving the scene. The prybar is believed to be the instrument used to strike the victim.

The owner of the property at 3618 Roberts was contacted. He advised he had several individuals who were doing renovations on the property; however he only knew the name of one of them. He provided the first name of the individual (witness). Detectives were able to determine the witness's full name from previous calls to the address. The witness was contacted and interviewed. During the interview the witness stated he was at the address (3618 Roberts) when an individual he knows as, "Black Joe" (suspect) entered. The suspect asked the witness for a stick. Both parties responded to the witness's vehicle where the suspect retrieved a pry bar. The suspect walked westbound in the alley with the witness following at a distance. The witness reported seeing the suspect raise the bar above his head and bring it down rapidly as though he was striking someone. He then heard someone yell loudly. The witness quickly turned and walked back to the residence at 3618 Roberts and went inside, fearing the suspect may come after him next. He stayed in the residence until he saw the suspect leave the scene walking eastbound in the alleyway and then northbound on Monroe.

The witness was able to provide a phone number to the suspect's girlfriend. In addition he led detectives to a local hotel he had given the suspect a ride to on a previous date. Detectives were able to use the information

**PROBABLE CAUSE STATEMENT FORM**

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above to acquire the name, Joseph M. Parker, black male, 06/24/1981 as a possible suspect. A photographic lineup was generated with Parker and viewed by the witness. The witness positively identified Parker as the suspect.

While generating the photographic lineup, detectives discovered Parker had been arrested for some outstanding warrants approximately one hour and fifteen minutes after the murder occurred and is in-custody at the Jackson County Jail. When Parker was arrested he asked the Arresting Officer, "This is over and argument aint it?"

On 10/31/2017 Parker was transported to Police Headquarters from the Jackson County Detention Center for the purpose of providing a statement. Parker was read the Miranda Warning and Waiver. Parker refused to listen while the Miranda Warning was being read and placed his fingers in his ears even after being asked to stop and listen several times. Parker advised he did not want to talk with detectives. Parker was transported back to the Jackson County Detention Center.

Printed Name Hobart Price #5254 Signature *Hobart Price #5254*

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

\_\_\_\_\_  
Judge

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