

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

POLICE NO. :	17-093599
PROSECUTOR NO. :	095442355

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JEROME T. ROBERSON)	
1305 Highland Dr.,)	CASE NO. 1716-CR
Kansas City, MO - 64127)	DIVISION
DOB: 09/17/1986)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840911.0)

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 November 2, 2017, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Michael W. Cantwell caused the death of Michael W. Cantwell 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 November 2, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count Three, 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 deadly weapon.

PROBABLE CAUSE STATEMENT FORM

Date: 11/13/17

CRN: 17-093599

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 11/02/17, at 2512 Quincy Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Jerome T. Roberson
(County) (Name of Offender(s))

B/M, 09/17/86 committed one or more criminal offense(s).
(Description of Identity)

Murder
Armed Criminal Action

The facts supporting this belief are as follows:

On 11/02/17 at approximately 0328 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 2512 Quincy Avenue on a reported shooting.

Upon arrival they discovered the victim seated in the driver seat of a red Ford Explorer Sport Trac with his seatbelt on. The victim was suffering from an apparent gunshot wound to the head. He was transported to a local hospital for treatment of his injuries and later died. The victim's death was subsequently ruled a homicide.

Witness #1 was contacted and stated she was asleep inside 2512 Quincy when she heard gunshots and came outside. She stated the suspect, whom she referred to as, "Rome" told her to go to the victim's truck and take his gun. She stated she ran over to check on the victim, not to take his gun, and the suspect said, "We should take his truck". Witness #1 told the suspect, "You just pretty much killed him, you're not about to take his truck". The suspect subsequently ran off. Witness #1 stated she never saw a gun in the victim's truck nor did anyone take a gun from his vehicle. She further stated witness #2 was outside when the shooting occurred. Witness #1 showed detectives a news article she pulled up on her cellphone from Fox4kc.com. The article depicted a photograph of Jerome T. Roberson who was wanted in connection with a murder in Independence, Missouri. She stated she's known Jerome for about 8 months. She was subsequently shown a photographic lineup of six black males similar in appearance with Jerome T. Roberson, black male, 09/17/86 in the #6 position. Witness #1 positively identified Roberson as the individual who shot the victim.

Witness #2 was contacted and interviewed. During the interview she stated the victim was supposed to pick her up at the address (2512 Quincy Avenue) around 9:00 pm, however he didn't show up until hours later. Upon his arrival the victim parked in the driveway and witness #2 went inside the residence to pick up her stuff and see if witness #1 would come with her and the victim. She stated as she was exiting the residence the suspect, whom she knows as Rome, was standing there on the porch with his pistol out, and blocking her way. She stated he had the pistol in his right hand but switched it to his left hand. She stated he fired numerous shots at the victim's vehicle after which he looked at her and said, "You didn't think I'd do some shit like that, did


PROBABLE CAUSE STATEMENT FORM

CRN 17-093599

you?" Witness #2 realized the bullets struck the victim's vehicle so she ran to check on him. When she got to the vehicle she saw the victim had been shot in the head. She stated Rome grabbed something off the front porch and fled the scene northbound on Quincy. She subsequently got the victim's cellphone and dialed 911.

Witness #2 was shown a photographic lineup consisting of six black males similar in appearance with Jerome T. Roberson, black male, 09/17/1986 in the #6 position. She positively identified Roberson as the individual she referred to as Rome and the suspect who shot the victim.

On 11/11/17 Jerome T. Roberson was arrested. On 11/13/17 he was questioned and immediately requested an attorney.

Printed Name Detective Danny Thomas #4933 Signature  #4933

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

Judge

Circuit Court of _____ County, State of Missouri.

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-078324
PROSECUTOR NO. :	095442354

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JEROME T. ROBERSON)	
1305 Highland Dr.,)	CASE NO. 1716-CR
Kansas City, MO - 64127)	DIVISION
DOB: 09/17/1986)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
)	DEFENDANT.

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 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Brandon R. Brown 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 October 28, 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

State vs. Jerome T. Roberson

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/ Traci A. Stansell
Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050
(816) 881-4591
trupp-stansell@jacksongov.org

WITNESSES:

PO Christopher Brayer , 223 N. Memorial Drive, Independence, MO - 64050
Brandon R. Brown , Prosecuting Atty. Office, Kansas City, MO - 64106



State vs. Jerome T. Roberson

DET Christopher Burris , 223 N. Memorial Drive, Independence, MO - 64050

DET Loran Freeman , 223 N. Memorial Drive, Independence, MO - 64050

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

DET Scott Mckee , 223 N. Memorial Drive, Independence, MO - 64050

[REDACTED]

[REDACTED]

[REDACTED]

PROBABLE CAUSE STATEMENT

Date: 11/13/2017

Report #: 2017-78324

I, Christopher Burris, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 10/28/2017, at 1404 hours, Jerome T. Roberson, (Race- Black, Sex- Male, DOB- 09/17/1986, Address-5909 E. 12th Street, Kansas City, Missouri 64126, SSN- [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 10/28/2017, at approximately 1404 hours, Police Officers with the Independence, Missouri Police Department were dispatched to 12817 E. 47th Street South, Lot #96, Independence, Jackson County, Missouri, reference an aggravated assault. Responding officers were advised by communications officials that the victim had been shot in the face, and was laying on the ground near the residence identified above. Officers were also advised that the subject who shot the victim was a black male subject, fleeing the area in a red Chevrolet Camaro with yellow racing stripes.

On arrival, officers discovered Brandan R. Brown, white male, 01/14/1988, on the ground, being held by who was later identified as his mother [REDACTED]. Medical care provided at the scene was unsuccessful, and Brown was ultimately pronounced deceased at the scene by EMS Officials. Another subject, [REDACTED] was also found to be suffering from a minor injury to his right hand. A subsequent ruling by the Jackson County Medical Examiner's Office ruled Brown's death a homicide with the manner being due to multiple gunshot wounds.

Investigators were called to the scene. During the investigation, officers and Investigators were provided information which indicated a disturbance had ensued at the residence regarding the presence of a subject named "Rome," who was an "unwelcome" visitor. Investigators learned that Brown was in possession of a handgun at the time of the disturbance, however, according to witness statements, never produced or threatened use of the weapon during the disturbance. This firearm was later identified as possibly being a Springfield XD .40 caliber semi-automatic handgun, missing from the open carry holster worn on Brown's hip prior to the disturbance and his subsequent death.

Detective Robert Brady contacted [REDACTED] for a witness interview. During the interview, [REDACTED] described a previous association between Roberson and her grand-daughter, [REDACTED], and that Roberson had played a role in a previous assault against [REDACTED] in Blue Springs, Missouri. Ina stated, as a result of his previous interactions with [REDACTED], and the presence of [REDACTED] at the residence at the time of the disturbance, [REDACTED] and Brown both ordered Roberson to "leave" and advised him he was not welcome there. [REDACTED] stated that soon after observing Roberson walking away from the residence, she observed him (Roberson) "run up" and shoot Brown. [REDACTED] stated, after Brown fell to the ground, Roberson stood over Brown and fired several more shots, striking Brown as he was incapacitated. [REDACTED] stated Roberson then fled the area driving the red Chevrolet Camaro referred to above. Detective Brady presented a digital color photo array, or "photo lineup" to [REDACTED] [REDACTED] selected the digital color image of Roberson, identifying him as the person who shot Brown as described above.

Detective Brice Minter contacted [REDACTED]. [REDACTED] was subsequently formally interviewed at Police Headquarters. [REDACTED] advised that she did not observe the incident and/or fleeing vehicle, but was advised by [REDACTED] that the suspect who shot Brandan Brown was an African American male believed to be an acquaintance of [REDACTED]'s identified with the moniker name of "Rome". [REDACTED] advised that she has known "Rome" for approximately (5) years and admitted that she has received methamphetamine from him in the past, but denied him being her current drug supplier. During the interview, [REDACTED] signed consent to search her phone. [REDACTED] had Facebook messages from the Je'Romero Smith profile with the most recent being on 10/28/2017 at 1312 hours. [REDACTED] sent Je'Romero Smith (Roberson) a message at that time stating "My grandma is here don't come over."

Detective Scott McKee conducted a formal interview with [REDACTED]. [REDACTED] advised he observed Roberson arrive at the residence [REDACTED] told Detective McKee if [REDACTED] saw Roberson it would not be a good situation. According to [REDACTED], Roberson arrived in a red Chevrolet Camaro with two unknown females. [REDACTED] said he told Roberson that now was not a good time to see [REDACTED] because she was inside asleep and her family and friends were there helping to clean up the residence. According to Summitt, Roberson then got out of the car and said he did not "give a fuck" and was going to talk to [REDACTED]. [REDACTED] advised Roberson walked up to the porch where Brandon and [REDACTED] were, reaching for the screen door to walk inside. Ina then grabbed Roberson's arm and said, "excuse me, who are you?" That was when Roberson said, "I am Rome." [REDACTED] then stated, "You're Rome," "you're not going in there and you need to leave now". [REDACTED] said, "You're the one that stole [REDACTED]'s phones." Roberson said, "I paid her back for that." [REDACTED] said at that time Rome saw that Brandon had a handgun in a holster on his right hip and his hand on the gun. Roberson then told Brandon to get his hand off his gun and then Roberson put his hand in his right pocket. [REDACTED] then said to Roberson, "What do you have a gun?" and started to pat his right side. Roberson told [REDACTED] not to touch him and he pulled his hand out of his pocket and was holding a handgun and was pointing it in the direction of [REDACTED] and Brown. Roberson told Brown not to unholster his gun, and Brown said, "I won't, you just put your gun back in your pocket." [REDACTED] said that Brown may have unsnapped the holster, but he did not have his hand on his gun.

Summitt stated he then saw [REDACTED] get on her phone and was either calling the police or acting like it. He said he heard her say there is a guy here named "Rome." Rome then turned and walked down the steps still holding his gun and appeared to be leaving. He said as Rome exited the gate area he started walking between the two vehicles, [REDACTED]'s car and Brown's truck, and towards the red Camaro as if he was leaving. [REDACTED] said at the same time he observed Brown walking down the steps of the porch and beside the side of the trailer towards the street with his gun drawn and pointed down in a safe direction and not in a "ready" position. [REDACTED] said he believed Brown was just making sure that Rome was leaving and if he returned he would be ready for him. [REDACTED] said Brown was still beside the side of the trailer just standing there in case Roberson returned. He said he then saw Roberson turn around and he started shooting in Brown's direction. [REDACTED] did not believe Roberson could see Brown because of where he was standing beside the trailer. [REDACTED] said when he first heard the gun shots he believed Roberson was just shooting in their direction to scare them because he believed Ina had called the police. [REDACTED] said he then saw Brown move from the side of the trailer and into the street just in front of his truck believing he was going at Roberson because he was shooting. He continued to hear more shots being fired and at this time the three of them were pretty much in a line. He said Brown was in between Roberson and himself and when Roberson continued shooting, probably at Brown, he got shot. Detective McKee presented a digital color photo array, or "photo lineup" to [REDACTED] selected the digital color image of Roberson, identifying him as the person who shot Brown.

Follow-up was conducted regarding the suspect vehicle. A witness caught cell phone video of the suspect vehicle leaving the area. Review of the video revealed that the first three digits on the license plate were CN5. The Communications Unit was able to come up with a possible plate of CN5K5N. A computer check of the license revealed it was registered to [REDACTED] [REDACTED] at 415 W. Farmer Avenue, Independence, Missouri. Contact with [REDACTED] was made who advised his vehicle (which fit the description of the suspect vehicle) had been stolen. [REDACTED] had apparently been incarcerated and released from jail on 10/27/2017. [REDACTED]'s roommate [REDACTED] advised he was familiar with a subject named "Rome" and he had been over at their residence around 10/21 or 10/22. [REDACTED] identified Roberson as "Rome" via photo lineup.

On 10/29/2017, Police Officers with the Sugar Creek Missouri Police Department were dispatched to a report of a Stolen Auto. SCPD Officer Holman contacted [REDACTED] [REDACTED], who stated she wished to report her vehicle, a 2002 Plymouth PT Cruiser, as stolen. [REDACTED] stated her daughter, [REDACTED] [REDACTED], had made statements on October 29, 2017 that she intended to travel to the State of Texas with Roberson.

Investigators have learned that three active felony arrest warrants have been issued for Roberson, which appear to be unrelated to the investigation into the death of Brown. An arrest warrant has been issued by the Jackson County, Missouri Circuit Court for the offense Rape and Armed Criminal Action, bond \$50,000 cash only, with nationwide extradition

limits. An arrest warrant has been issued by the Jackson County, Missouri Circuit Court for Failure to Appear, Robbery 1st Degree, bond \$25,000.00, with nationwide extradition limits. An arrest warrant has been issued by the Clay County, Missouri Circuit Court for the offense of Failure to Appear, Tampering 1st Degree and Felony Property Damage, bond \$25,000.00, with nationwide extradition limits. A "Person of Interest" investigative stop order has also been issued for Roberson by Investigators with the Independence, Missouri Police Department regarding the investigation into the death of Brown.

Based on information gathered by Investigators, Roberson was believed to be in the company of [REDACTED]. Investigators were actively seeking Roberson and [REDACTED] to interview them regarding their reported association to this investigation. No other reliable leads or witness information has been provided to investigators to aid them in locating and contacting Roberson. Roberson has made no known effort to contact investigators since this incident occurred.

On 11/02/2017, Roberson was identified as a suspect in the shooting death of a male in Kansas City, Missouri which occurred in the early morning hours.

[REDACTED] was arrested on 11/02/2017 on an unrelated felony warrant. [REDACTED] was advised of her Miranda rights. [REDACTED] was interviewed after waiving her rights. [REDACTED] provided a statement about her association with Roberson. [REDACTED] reported that she had not seen Roberson since before the shooting and did not know his whereabouts. [REDACTED] admitted to stealing Kinsler's vehicle, but advised she was using it to go use illegal narcotics.

On 11/11/2017, Roberson was taken in-custody after an anonymous tip was received about his whereabouts.

On 11/13/2017, KCPD Detective Danny Thomas and Independence Detective Christopher Burriss attempted to interview Roberson. Upon being advised of his Miranda rights, Roberson declined to make a statement without an attorney.

Detective Christopher Burriss # 1401

/S/ Christopher Burriss

Print Name

Signature