

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

<b>POLICE NO. :</b>	17-102893
<b>PROSECUTOR NO. :</b>	095442800

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
<b>REGINALD E. JONES JR.</b>	)	
<b>12512 Cambridge Ave,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64030</b>	)	<b>DIVISION</b>
<b>DOB: 01/27/1999</b>	)	
<b>Race/Sex: B/M;</b>	)	
<b>SSN: XXX-XX-XXXX</b>	)	
	<b>DEFENDANT.</b>	)

**COMPLAINT**

**Count I. Murder 1<sup>st</sup> Degree (565.020-001Y19840901.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **Class A Felony of Murder in the First Degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about December 7, 2017, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Reginald E. Jones by shooting him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years 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 December 7, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder 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 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. Murder 1<sup>st</sup> Degree (565.020-001Y19840903.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **Class A Felony of Murder in the First Degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about December 7, 2017, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Darryl A. Singleton by shooting him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

#### **Count IV. 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 December 7, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder 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 Murder 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 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/ Sarah A. Castle  
Sarah A. Castle (#64770)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

DET Leland W. Blank, 1125 Locust, Kansas City, MO - 64106

DET Chason C. Crowell, 1125 Locust, Kansas City, MO - 64106

DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO - 64106

DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO - 64106

DET Daniel W. Frazier, 1125 Locust, Kansas City, MO - 64106

PO Andrew Gordon, 1125 Locust, Kansas City, MO - 64106

Reginald E. Jones, Prosecuting Atty. Office, Kansas City, MO - 64106

DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO - 64106

Darryl A Singleton, Prosecuting Atty. Office, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 12-08-2017

CRN: 17-102893

I, Detective K. Oldham # 5166 (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 12-07-2017, at 4502 E. 24th St in Kansas City, Jackson Missouri Reginald E. Jones Jr

(County) (Name of Offender(s))

B/M, 01-27-99 committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows:

On 12-07-2017, at approximately 1939 hours, Officers were dispatched to 4502 E. 24th St, (LP's Grocery and Liquor) on a reported shooting. Upon their arrival, two black male victims were located lying on the sidewalk just outside the store suffering from apparent gunshot wounds.

EMS responded and pronounced the victims deceased at the scene. Twelve spent shell casings were located on the street and sidewalk in front of the store. The victims were positively identified as Darryl Singleton B/M, 11-16-60 and Reginald E. Jones Sr., B/M, 05-31-1981

A relative of the victim, Jones, responded to the scene and advised investigating detectives that she received information that Reginald Jones Jr had shot his father and someone else. She also advised that she heard that Reginald Jones Jr. and Reginald Jones Sr. had been involved in an argument.

A witness was located who works at the store. He advised he was present during the shooting and agreed to accompany detectives to Police Headquarters to provide a statement in regard. The witness stated that he heard one of the victims (Jones) arguing with his son on the phone. A short while later the suspect showed up at the store and the victim, Jones, went outside to talk with him. The witness noted that the suspect was holding a gun in his hand at this time. While they were outside, the victim Singleton, who is a store employee, was also outside smoking a cigarette. The witness heard several shots and when he went outside he observed both victims to be lying on the ground shot. The witness was shown a photo array of five black males and positively identified Reginald Jones Jr. BM, 1-27-1999 as the person he witnessed shooting both victims.

A search warrant was obtained through the Jackson County Courts for 4502 E. 24th St. A video surveillance system was located and video was extracted. In external video, six black male individuals can be seen standing on the sidewalk just outside the front door of the store. Victim Singleton is seen to be leaning against an ice cooler and victim Jones is having a conversation with a black male wearing a black Nike baseball hat, a black hoodie with a grey Nike symbol, black Nike shorts over black tights and white socks that are pulled up to the calf. The three other black males are standing to the side and appear to not be involved in the confrontation.

The black male wearing the black Nike clothing pulls a hand gun from his waist area and holds it to his side as he and victim Jones continue to talk. Victim Jones turns away from the male and grabs the door handle as if he is going back into the store. The black male wearing the black Nike clothing raises the gun and shoots Jones who falls to the ground. The black male wearing the Nike clothing then points the gun at victim Singleton,

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shooting him. The three males who were standing to the side flee the scene on foot; eastbound on E. 24<sup>th</sup> St. The black male wearing the black Nike clothing enters orange Mitsubishi Eclipse and flees west bound on E. 24<sup>th</sup> St.

In interior video, prior to the shooting, the black male wearing the black Nike clothing enters the store and buys a sandwich. The black male appears to match the description of **Reginald Jones Jr. BM, 1-27-1999** to include a distinguishing white birth mark on the right side of his face.

On 12-11-2017, Reginald Jones Jr voluntarily turned himself in to police. On 12-12-17 he was transported to 1125 Locust for questioning. He was advised of his Miranda Rights. Jones advised he understood his rights and agreed to speak to detectives. Jones stated that on the night of the homicide he was called to LP's market by the victim. Upon further questioning, Jones advised he did not wish to answer any further questions without a lawyer present.

Printed Name K. Oldham # 5166 Signature *Det. K. Oldham #5166*

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

\_\_\_\_\_  
Judge

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