

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

POLICE NO. :	18-012326
PROSECUTOR NO. :	095443868

STATE OF MISSOURI,
PLAINTIFF,
vs.
KAMERON L. GINES
2529 Mersington Ave,
Kansas City, MO - 64127
DOB: 06/24/1994
Race/Sex: B/M;
[REDACTED]
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 February 19, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of B.C. 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 February 19, 2018, 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 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.

State vs. Kameron L. Gines

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 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/ Nichole Erickson

Nichole Erickson (#52086)
Assistant Prosecuting Attorney
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WITNESSES:

[REDACTED]

[REDACTED]

SGT Martin A Cobbinah , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

[REDACTED], Kansas City, MO - 64106

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

[REDACTED]

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

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

[REDACTED]

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: 02/21/2018

CRN: 18-012326

I, MDet. Brent Taney #4641

(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 02/19/2018, at 2711 Indiana Avenue in
(Date) (Address)

Kansas City, Jackson County Missouri Kameron L. Gines
(County) (Name of Offender(s))

B/M, 06/24/1994 committed one or more criminal offense(s).
(Description of Identity)

Murder 2nd degree/ ACA

The facts supporting this belief are as follows:

On 02/19/2018 at 1518 hours, Officers of the Kansas City Missouri Police Department were dispatched to 2711 Indiana Avenue, Kansas City Jackson County, Missouri in regard to a shooting. Upon arrival, Officers located the victim lying on the ground in the gas station parking lot suffering from apparent gunshot wounds. The victim was transported to an area hospital where he was pronounced dead due to his injuries.

Witnesses stated the suspect arrived in a black Jeep Cherokee and parked next to a gas pump. A white Jeep Cherokee occupied by a black female and a white male parked behind the suspect vehicle. The suspect, black female and white male all entered the Good Trip and purchased some items from inside the store. The victim was also inside the Good Trip and exited the business after the suspect, black female and white male. Witnesses stated the victim approached the suspect who was standing near the white Cherokee and began yelling at the suspect. The white male exited the white Jeep Cherokee and confronted the victim. The victim and white male engaged in a physical altercation. Witnesses stated after the physical altercation with the white male, the victim walked toward the suspect, shoved him from behind and the suspect turned around and shot the victim.

On 02/20/2018, the black female witness who occupied the white Jeep Cherokee responded Police Headquarters and provided a statement. The witness stated she went with her brother, the suspect, to purchase the black Jeep Cherokee and responded to the gas station, 2711 Indiana to put gas in both vehicles. The witness identified her brother as **Kameron L. Gines, B/M, 06/24/1994**. The witness stated they went inside the Good Trip to purchase the gas and some other items when she observed the victim looking at her. The witness stated the victim kept looking to where she felt uncomfortable. The witness stated she exited the store, walked toward the white Jeep Cherokee and informed the suspect about the victim looking at her. The witness stated the victim approached the suspect and began yelling at him when the suspect told the victim to leave. The witness stated the victim told the suspect to shoot him after the suspect reached for his gun located in his waistband. The witness stated the white male, a family friend and mechanic, exited the white Jeep Cherokee and confronted the victim. The Witness stated the victim began fighting with the mechanic and engaged in a physical altercation. The witness stated during the physical altercation, the suspect, pulled out his gun and yelled toward the people inside the store to come and get the victim because he doesn't want to have to shoot the victim. The witness further stated after the physical altercation with the mechanic, the victim walked towards the suspect and shoved him from

PROBABLE CAUSE STATEMENT FORM

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behind. The witness stated the victim kept saying "shoot me" as he approached the suspect. The witness stated when the victim shoved the suspect from behind, the suspect turned around and shot the victim three times and left the scene in the black Jeep Cherokee.

On 02/20/2018, the mechanic was transported to Police Headquarters and provided a statement. The mechanic stated he was at the gas station with the suspect and the suspect's sister when the victim approached the suspect and would not leave them alone. The mechanic stated he and the victim engaged in a physical altercation. The mechanic further stated after his physical altercation with the victim, the victim approached the suspect and shoved him from behind. The mechanic stated after the victim shoved the suspect, the suspect turned around and shot the victim.

On 02/20/2018, the suspect was taken into custody and transported to Police Headquarters. **Gines** was advised of his Miranda Rights and stated he did not want to make a statement.

Printed Name MDet. Brent Taney #4641

Signature

MOE. / [Signature] #4641

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

Judge

Circuit Court of _____ County, State of Missouri.