

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	18-002739
PROSECUTOR NO. :	095445219
OCN:	ca011092

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
BILLY J. STANDLEY)	
18872 Wigwam Drive)	CASE NO. 1816-CR
Independence, MO 64050)	DIVISION
DOB: 02/07/1997)	
Race/Sex: W/M)	
████████████████████)	
)	
)	DEFENDANT.

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 2, 2018, in the County of Jackson, State of Missouri, the defendant forcibly stole US currency in the possession of ██████████ ██████████, and in the course thereof defendant or another participant in the offense was armed with a deadly weapon.

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 (571.015-001Y19755299.0)

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 April 2, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference,

State vs. Billy J. Standley

and the defendant committed the foregoing felony of Robbery 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.

Count III. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 14, 2018, in the County of Jackson, State of Missouri, the defendant forcibly stole US Currency in the possession of [REDACTED], and in the course thereof defendant or another participant in the offense was armed with a deadly weapon.

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 IV. Armed Criminal Action (571.015-001Y19755299.0)

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 April 14, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 3, all allegations of which are incorporated herein by reference,

and the defendant committed the foregoing felony of Robbery 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.

State vs. Billy J. Standley

Count V. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 14, 2018, in the County of Jackson, State of Missouri, the defendant forcibly stole US Currency in the possession of [REDACTED] and in the course thereof defendant or another participant in the offense was armed with a deadly weapon.

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and the defendant committed the foregoing felony of Robbery 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 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/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney

State vs. Billy J. Standley

321 W. Lexington
Independence, MO 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

1. 7-11, 909 SW Oldham Parkway, Lee'S Summit, MO
2. DET Chad Albin, 10 NE Tudor, Lee's Summit, MO 64086
3. DET Erika Albin, 10 NE Tudor, Lees Summit, MO 64086
4. PO Mike Ball, 10 NE Tudor, Lee's Summit, MO 64086
5. [REDACTED]
64106
6. PO James Brock, 10 NE Tudor, Lee's Summit, MO 64086
7. [REDACTED]
64106
8. [REDACTED]
64106
9. SGT Aaron Evans, 10 NE Tudor, Lee's Summit, MO 64086
10. PO Eric Faler, 10 NE Tudor, Lee's Summit, MO 64086
11. DET Aaron Ide, 10 NE Tudor, Lee's Summit, MO 64086
12. PO Jennifer Kudzinski, 10 NE Tudor, Lee's Summit, MO 64086
13. DET John Kudzinski, 10 NE Tudor, Lee's Summit, MO 64086
14. [REDACTED] MO
64106
15. PO Scott McMilian, 10 NE Tudor, Lee's Summit, MO 64086
16. PO Jessica Morse, 10 NE Tudor, Lee's Summit, MO 64086
17. PO Stephen Owings, 10 NE Tudor, Lee's Summit, MO 64086
18. Quick Trip, 120 SW M 150 Highway, Lees Summit, MO 64082
19. DET Michael Reese, 10 NE Tudor, Lee's Summit, MO 64086
20. PO Ryan Small, 10 NE Tudor, Lee's Summit, MO 64086
21. PO Mike Votypka, 10 NE Tudor, Lee's Summit, MO 64086
22. PO Tim Warner, 10 NE Tudor, Lee's Summit, MO 64086

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State vs. William C. Crawford

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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/ Michael J. Hunt
Michael J. Hunt (#34818)
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STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 2018-3818, 3755, 3302, 2739

Date: 04-27-2018

I, Detective Aaron Ide, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 04-02-2018 and 04-14-2018, at 7-Eleven, 909 SW Oldham Parkway, Lee's Summit, Jackson County, Missouri, and 04-25-2018 at Quik Trip 120 SW M-150 Highway, Lee's Summit, Jackson County, Missouri, William C. Crawford, W/M,03/16/1985 committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 4/02/2018, Officers were dispatched to 7-11 (909 SW Oldham Pkwy.) in regard to an armed robbery. Lee's Summit Police Dispatch advised two white males, with handguns robbed the business, and then ran eastbound.

PO Faler contacted the employee, [REDACTED], who stated two white males entered the business. The first suspect was wearing a Carhartt style brown jacket, with the hood up and a red and white bandana covering his face. The second suspect was wearing a black jacket, with hood up and a red and white bandana covering his face. The first suspect approached the counter and produced a black handgun and pointed it at [REDACTED], demanding money from the register. The second suspect produced a black handgun, pointed it at [REDACTED], and told him to hurry up. [REDACTED] opened the case register and the first suspect reached over the counter and grabbed a handful of cash from the register.

Under \$200.00 in US currency was stolen from the business.

Video surveillance was later reviewed with the following observations. The first suspect was wearing a tan hoodie with an Under Armour logo on the hood, dark pants, dark hat, black and white shoes, red bandana and black gloves with white markings on the top. The second suspect was wearing a black Nike hoodie with the logo on the chest, dark pants, red hat, gray shoes and a red bandana. The first suspect grabs the cash, while the second suspect stands, just inside the door, holding it open with his body. At 0541 hours, the two suspects run out of the business.

On 4/14/2018, Officers were dispatched to 7-11 (909 SW Oldham Pkwy.) in regard to an armed robbery.

PO Faler made contacted the employee [REDACTED], who stated two males entered the business and he immediately recognized them as the males from the robbery on 4/02/2018. The first suspect ran up to the counter and pointed a handgun at him and then pointed the gun at a customer, who was inside the business. The second suspect followed the first suspect into the business and pointed a handgun at him. The cash register was already open due to checking out the customer and the first suspect reached over the counter and grabbed the entire cash drawer. Both suspects then ran out of the business.

\$212.60 in US currency was stolen from the business.

Video surveillance was later reviewed with the following observations. The first suspect wearing a green hoodie with the hood up, red bandana, light colored gloves, dark pants and dark shoes. He was carrying a black handgun. The second suspect was wearing a red jacket with the hood up, black and white shirt, red bandana, light colored gloves, dark pants and light colored shoes. The second suspect was carrying a black handgun. At 0540 hours the suspects exit the business.

On 4/25/2018, at 0236 hours, Officers with the Lee's Summit Police Department were dispatched to Quik Trip (120 SW 150 Hwy.) in regard to an armed robbery. LSPD dispatch advised Quik Trip's security team was observing the robbery on live video, due to the clerk pushing the panic button.

Upon arrival, PO Morse contacted the clerk, [REDACTED] who stated two unknown, younger (18-20) white males, wearing bandanas over their faces. One suspect pointed a black handgun at [REDACTED] and told him to open the cash drawers. While [REDACTED] and the suspect with the gun were at the cash register, the second suspect was digging behind the counter area for cigarettes. [REDACTED] opened a second cash drawer and the suspect with the gun took the money out of the drawer. The suspect with the gun then ordered [REDACTED] to open the third cash drawer, while pointing the gun

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 2018-3818, 3755, 3302, 2739

directly at him. No money was located in the third cash drawer and the suspect with the gun asked [REDACTED] for his cell phone, to which [REDACTED] showed the suspect he did not have his phone. The suspect continued to point the gun at [REDACTED] and said, "If you call the police, I'll kill you mother fucker." Both suspects ran out of the business through the east doors. [REDACTED] observed a black pickup truck drive past the east doors, through the parking lot.

PO Morse observed video surveillance and at 0231 hours, a dark blue, two door, Chevrolet pickup truck entered the Quik Trip parking lot from the west and drives behind the building. The pickup had a plastic front license plate holder and no front license plate. It was an older model pickup, with square shaped headlights and rectangle amber lights underneath the headlights. The pickup truck was missing paint on the roof above the driver's seat and appeared to have tinted windows. The truck had no tailgate and appeared to have a rear license plate. Both suspects exit the truck and use the north door of the east side doors to enter the business.

PO Morse described suspect #1 as a white male, tall/slim build, wearing a black and white baseball hat with orange logo on the front. He has brown hair and is wearing a light colored bandana over his face. The suspect is wearing a black coat, white belt, torn blue jeans and brown cowboy boots. He had a black and silver semi-automatic handgun in his right hand.

PO Morse described suspect #2 as a white male, tall/slim build, wearing a green or gray Kansas City Chiefs hoodie with the hood up. He is wearing a blue baseball cap, a light colored bandana over his face, dark pants and white/black tennis shoes. Suspect #2 appears to have a baton strapped to his left hip and is carrying a black backpack.

Suspect #1 stole \$101.49 in US currency from the business.

Suspect #2 stole one carton of Virginia Slim cigarettes, one carton of Pall Mall cigarettes and 2 cartons of Marlboro cigarettes.

Detective Reese arrived on scene and also reviewed the video surveillance. He witnessed suspect #1 wearing a black front, with white back, trucker style baseball cap. The baseball cap had a "Zoom" logo written on the front. He witnessed suspect #2 wearing a white bandana around his face and described his shoes as dark colored with white soles. Suspect #2 was wearing flashlight holder and a flashlight on the left side of his belt.

Detective Ide responded to Quik Trip, later in the morning, to review more video surveillance prior to the robbery. Detective Ide witnessed the suspect pickup truck arrive at Quik Trip at 0208 hours. The pickup truck parks in a parking space on the west side of the business. The driver exits the vehicle and walks to the rear of the vehicle. Once at the rear of the vehicle, the suspect switches out the license plate with another unknown license. The driver re-enters the vehicle and drives to the front of business, parking at the fuel pumps. The driver (suspect #1) exits the vehicle and enters the business, without anything covering his face. He has on the same clothes he wore during the robbery. Suspect #1 walks around the business, appearing to look around the business to see how many employees were working at their locations. Suspect #1 exits the business and the vehicle leaves the parking lot, returning a short time later.

A still video surveillance image was disseminated Metro Police agencies.

On 4/26/2018, Lee's Summit Police Crime Analyst Phillips received information from the Kansas City Police Department regarding a report of shots fired, near 5430 Oakley Ave on 4/25/2018 at approximately 0505 hours. Kansas City Police Officer Cassell contacted [REDACTED], who stated his [REDACTED]; "Billy" drove by his house and stopped by his car. [REDACTED] stated he was at his front door and looked at Billy and said, "What?" [REDACTED] stated Billy was with an unknown white male and were occupying a dark blue Chevrolet Silverado. [REDACTED] explained he heard one occupant of the vehicle state, "light it up!" One of the occupants then fired several shots into [REDACTED] white Cadillac.

Crime Analyst Phillips began to search [REDACTED] Facebook page and located a friend [REDACTED] named Billy Jo. Analyst Phillips was able to identify Bill Jo as Billy J. Standley, 6/04/1997. Billy Standley is currently on State Probation.

Detective Reese sent an image of suspect #1 to Billy Standley's Probation Officer and requested more information about his residence. The Probation Officer explained Billy was residing at a hotel on 291 Highway, near Quik Trip. Detective Reese and Detective E. Albin checked Great Western Motel (15912 E. US 24 Hwy.), Independence, Missouri for the suspect vehicle. As they pulled into the parking lot, Detectives witnessed a vehicle matching the suspect vehicle, parked in the lot. A white male was standing in the doorway of the truck. The white male entered the vehicle and began

