

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

POLICE NO. :	18-031399
PROSECUTOR NO. :	095445248
OCN:	HS002256

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
THEODIST A. LEWIS	)	
3338 Brooklyn Ave.	)	CASE NO. 1816-CR
Kansas City, MO 64109	)	DIVISION
DOB: 09/24/1986	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 April 27, 2018, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Norez R. Brock caused the death of Norez R. Brock 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 April 27, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count One, 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. Theodist A. Lewis

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/ Jordan R. Bergus

Jordan R. Bergus (#64729)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3319
jbergus@jacksongov.org

WITNESSES:

1. Norez R. Brock, 7337 Norton Ave., Kansas City, MO 64132
2. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
3. PO Jeffrey M. Epstein, 1125 Locust, Badge #5092, Kansas City, MO 64106
4. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106

5. [REDACTED]

6. [REDACTED]

64106

7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
9. DET Brent R. Taney, 1125 Locust, Kansas City, MO 64106
10. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/29/2018

CRN: 18-31399

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 04/27/2018, at 10615 Blue Ridge Bl in
(Date) (Address)

Kansas City, Jackson Missouri Theodist A. Lewis
(County) (Name of Offender(s))

B/M 09/24/1986, 6'00", 180, Blk, Bro committed one or more criminal offense(s).
(Description of Identity)

Murder , Armed Criminal Action

The facts supporting this belief are as follows:

On 04/27/18 at approximately 2317 hours, Officers of the Kansas City, Missouri Police Department were dispatched to the 7-11 Store located at 10615 Blue Ridge Boulevard in regard to a shooting.

Upon arrival they discovered a black male victim suffering from an apparent gunshot wound. The victim was transported to an area hospital where he died from his injuries. The case was subsequently ruled a homicide.

During the course of the investigation, surveillance video was obtained from the 7-11. The video depicts the suspect confronting the victim and an argument ensues. The suspect subsequently leaves the store and walks to a tan colored vehicle which is parked at the gas pumps. He enters the vehicle briefly and then walks back towards the entryway where he waits for the victim to exit. The suspect confronts the victim again as he exits the store. The victim and suspect are a few feet apart when the suspect shoots the victim. The victim reacts by falling to the ground and grabbing his side. The suspect enters the tan vehicle and flees the scene.

A still photograph from inside the 7-11 was released to local media outlets which resulted in a tip. The information was forwarded to PIC (Perpetrator Information Center) who developed Theodist A. Lewis, black male, 09/24/1986 as a possible suspect. A photograph of Lewis was compared to surveillance video of the suspect from the shooting and they appear to match.

Based on the above information a photographic lineup was created with six black males similar in appearance with Lewis in the #2 position. The lineup was viewed by a witness who positively identified Lewis as the suspect.

PROBABLE CAUSE STATEMENT FORM

CRN 18-31399

On 04/28/18 at approximately 2121 hours, Officers of the Kansas City, Missouri Police Department were dispatched to [REDACTED] in regard to a caller who stated their niece's son told him that people thought he killed someone the night before. The caller further advised his wife saw a photograph of the suspect on the news from the murder at 7-11. She advised the caller that the suspect looked just like him. Officers arrived at the scene and were able to locate the party hiding in a closet in the residence. They identified the individual as Theodist Lewis, black male, 09/24/1986. After contacting detectives the officers were able to determine Lewis had been identified as the suspect. He was subsequently arrested and transported to Police Headquarters for questioning. He was advised of his Miranda Rights and stated he didn't want to speak with detectives and would like to speak with an attorney.

At the time of his arrest, Lewis was found hiding in a closet. Lewis was observed wearing yellow boots, jeans, and a green shirt. A black zip up hooded sweatshirt was located behind the residence where Lewis was arrested. The clothing Lewis was wearing and the sweatshirt located behind the residence appeared to match the clothing seen in surveillance video at the time of the murder. Upon examination of Lewis's clothing, apparent blood was observed on the green shirt, and jeans. The apparent blood was tested with a hemistix, which is a presumptive test for blood, and tested positive for blood.

Printed Name Hobart Price #5254 Signature /S/ Hobart Price

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

Judge

Circuit Court of _____ County, State of Missouri.