## IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

**POLICE NO.:** 18-049700

PROSECUTOR NO.:	095446446
OCN:	HS003433
STATE OF MISSOURI, PLAI	) NTIFF, )
vs.	)
SABRIAH U BREWSTER 6810 E 138th Terrace, Grandview	) ) ) CASE NO. 1816-CR02982
Grandview, MO 64030	DIVISION
DOB: 07/19/1986	)
Race/Sex: B/F	)
DEFEN	) IDANT. )

## AMENDED COMPLAINT

# Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 30, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Sean Tomlin by shooting Sean Tomlin.

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. 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.

#### State vs. Sabriah U Brewster

#### **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 June 30, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault 1st Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 1st 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/ Christine Willis
Christine Willis (#48475)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4488

### State vs. Sabriah U Brewster

## cwillis@jacksongov.org

## **WITNESSES:**

- 1. PO Seco Guhdija, 1125 Locust, Kansas City, MO 64106
- 2. DET Dawn M. Minor, 1125 Locust, Kansas City, MO 64106
- 3. PO Venasa L. Ray, 1125 Locust, Kansas City, MO 64106
- 4. DET Angelina M. Sanchez,
- 5. Sean J Tomlin, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 6.

816-cr02982		Flid C 5:10pm
PROBA	BLE CAUSE STATEME	DEFORM +//// SYMS
Date: 07/01/2018	E RECEIV	CRN: 18-49700
I, Detective Angelina Sanchez #5708	EPA	
(Name and identify law enforcement officer	, or person having information as	s probable cause.)
knowing that false statements on this for	m are punishable by law, st	ate that the facts contained herein are true
I have probable cause to believe that on	06/30/2018 , at	3402 Troost is
	(Date)	(Address)

Missouri Sabriah U. Brewster

(Name of Offender(s))

committed one or more criminal offense(s).

The facts supporting this belief are as follows:

(County)

(Description of Identity)

Kansas City, Jackson

B/F, 07/19/1996

On 06/30/2018 at 1905 hours, officers responded to Diamond Cuts Barber Shop (3402 Troost) on a reported shooting. Upon arrival, they observed the shop to be empty with items scattered on the ground, it appeared as though the establishment had been quickly evacuated. TAC crews arrived on scene and cleared the building for safety purposes. No victims were located inside; however blood was observed inside the location. At1930 hours, VIC1 reportedly responded to Research Hospital and advised he had been shot at Diamond Cuts Barber Shop by a female hair stylist, **BREWSTER**, **SABRIAH U. B/F 07/19/1996**, who was working at the time of the shooting.

VIC1 stated the following: He had set up a hair appointment earlier in the day with **BREWSTER** via telephone call for himself and WIT1. When **BREWSTER** arrived to the salon, she began cutting WIT1's hair in a salon chair and VIC1 was sitting directly across from WIT1 on the bench. While **BREWSTER** was standing behind WIT1 cutting his hair, VIC1 suddenly observed **BREWSTER** pointing a gun towards him and she began shooting. VIC1 quickly got up and exited the building. VIC1 drew a handgun from his pocket after he had been shot but stated he never returned fire. Once outside, he gave WIT1 his car keys and the two responded to Research Medical Center. VIC1 advised that at no time while in the barber shop did he have his weapon in view; that he kept it in his pocket until he felt a need to protect himself and WIT1. VIC1 stated he has no relationship with **BREWSTER** other than one prior time she did his hair, and that no altercation or argument ever took place between anybody took place before the shooting. VIC1 was shown a photo lineup and positively identified **BREWSTER** as the person who shot him.

WIT1 stated the following: He and VIC1 arrived to Diamond Cuts around 1600 or 1700 hours in order to have their hair done by **BREWSTER**. The two waited for **BREWSTER** at the salon for one to two hours. When **BREWSTER** arrived, WIT1 sat in the second salon chair from the door and VIC1 sat directly across from him on a bench. WIT1 stated as **BREWSTER** was behind him cutting his hair, he suddenly observed a gun close to the right side of his head pointing towards VIC1. WIT1 looked at VIC1who had his arms out as if signaling to stop something and **BREWSTER** began to shoot. WIT1 immediately got out of the chair and ran to the exit. When he made it outside, WIT1 realized VIC1 had been shot. VIC1 gave his keys to him and told him to get the

#### PROBABLE CAUSE STATEMENT FORM

CKN 18-49700	CRN	18-49700	
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car. WIT1 complied with this request and drove VIC1 to Research Medical Center. WIT1 was shown a photo lineup and positively identified **BREWSTER** as the one who shot VIC1.

While Detectives were on scene at Diamond Cuts, they found that 3406 Troost, which was attached and directly next door, was owned by the same individuals who owned the salon. Hairstylists were seen exiting from this building and detectives on scene instructed patrol officers to get names and numbers of individuals exiting. When **BREWSTER** exited at approximately 2100 hours, she was wearing a baggy sweatshirt and baggy pants. She provided officers with the name "Stacy" but was unable to spell it. **BREWSTER** also provided a false date of birth and social security number. **BREWSTER** then advised police her name was "Brittany" but again, was unable to spell it. Upon further investigation, **BREWSTER** advised her first name was Sabriah. Officers at the scene had been notified prior to this encounter that family members at the hospital believed the suspect's name may be Sabriah. With this information, **BREWSTER** was taken into custody.

Detectives at the barber shop observed three shell casings near the second barber chair on the south side of the building, two near the third chair, and one near the fourth chair. All six shell casings were 9mm.

**BREWSTER** stated the following: She is an employee at Diamond Cuts; however, she was only working on 06/30/2018 from 1000 hours to around 1300 to 1600 hours. **BREWSTER** denied knowing that a shooting occurred at the barber shop; that she has never been in a shooting, seen a shooting, and has never shot anybody. **BREWSTER** stated she was at 3406 Troost preparing for a hair show.

VIC1 sustained five total gunshot wounds. I observed four of the five wounds to be in following locations: One gunshot wound to his right upper arm, a gunshot wound to his left leg and a possible exit wound to the inner left leg. A gunshot wound to the mid-lower abdomen and a possible exit wound to the right lower abdomen, and gunshot wound to his inner left arm. VIC1 also sustained a possible fracture to his left arm.

Printed Name	Angelina Sanchez	Signature /s/ Det. Sanchez 5708		
The Court finds probable cause and directs the issuance of a warrant this $\frac{1}{2}$ day of $\frac{1}{2}$ .				
Sanger Brutt				
	Circuit Court of	County, State of Missouri.		

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Form 50 P.D. (Rev. 9-2008)