

**IN THE CIRCUIT COURT
OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

Police# 16-056510
Prosecutor# 095433463
1616-CR
OCN# an014030

COMPLAINT

STATE OF MISSOURI

vs.

**Joseph R. Bonhomme
3211 Independence Ave. Apt. #3
Kansas City, MO 64124
DOB: 05/31/1994; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841305.0)

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 July 25, 2016, in the County of Jackson, State of Missouri, the defendant shot Robert Davis, and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to Robert Davis, and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on Robert Davis.

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 July 25, 2016, in the county of Jackson, State of Missouri, the defendant

committed the felony of Assault 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 Assault 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.

THE STATE OF MISSOURI

vs.

Joseph R. Bonhomme

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,



Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

[REDACTED]
DET Christopher Burris , 223 N. Memorial Drive, Independence, MO 64050
[REDACTED]
[REDACTED]

PROBABLE CAUSE STATEMENT

Date: 7/27/2016

Report #: 2016-56510

I, Detective Christopher Burris, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 07/25/2016, at about 2232 hours, Joseph R. Bonhomme, (Race- White, Sex- Male, DOB- 05/31/1994, Address-3211 Independence Avenue, Kansas City, Missouri 64125, SSN- [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 07/25/2016 at approximately 2232 hours, Independence Police Officers were dispatched to 1110 N. Noland Road, Apartment A, Independence, Jackson County, Missouri in reference to a shooting.

Upon the arrival of officers, they located a white male victim laying just inside the doorway bleeding from the head and / or neck. Also inside the apartment was the victim's roommate [REDACTED]. The victim was transported to Centerpoint Medical Center with life threatening injuries. Officer Brian Weiter obtained an initial statement from [REDACTED] in reference to this investigation. [REDACTED] told Officer Weiter that prior to his arrival, two Hispanic males knocked on the door. The males were coming over to purportedly repay five dollars to [REDACTED] and the victim regarding a marijuana transaction a day or two ago. [REDACTED] advised that upon opening the door, the Hispanic male suspects attempted to force their way in. [REDACTED] advised at some point at least one of the suspects fired a shot which hit the victim. [REDACTED] advised the suspects fled the scene. [REDACTED] advised he did not know the name of either suspect. [REDACTED] was subsequently interviewed at Police Headquarters and identified [REDACTED] as possibly having information about this case. [REDACTED] advised [REDACTED] had set up a drug transaction between him and his roommate with two Hispanic males he did not know, recently.

Two witnesses were identified at the scene. One witness spoke with Officer Baker. Witness 1 was identified as living in the building of 1100 N. Noland Road and having heard the gunshot. Witness 1 looked outside the window and saw a white mini-van leaving the area northbound. Witness 2 was identified by Detective Brian Draveling. Witness 2 told Detective Draveling he heard a sound like a firework and observed a white mini-van leave the parking lot. A 9mm spent shell casing was recovered on the steps leading down to the apartment.

[REDACTED] was contacted at her residence in Kansas City, Kansas. [REDACTED] agreed to come to Police Headquarters and provide a statement. During her statement [REDACTED] admitted to conducting a drug transaction with [REDACTED] and the victim on Friday. [REDACTED] denied bringing the two males to address and instead advised "Debbie" was with her. [REDACTED] would later identify "Debbie" as [REDACTED] via her Facebook profile page. Detectives with the Independence and Kansas City Police Department's Career Criminal Unit set up surveillance at one of [REDACTED] last known addresses. Detectives made contact with [REDACTED] brother [REDACTED] in Kansas City, Missouri. Detective Loren Freeman spoke with [REDACTED] who advised [REDACTED] had been staying at an apartment located at 4419 N. Wheeling Avenue in Kansas City, Missouri. As Detective Freeman was speaking with [REDACTED], a subject identified as Joseph R. Bonhomme called [REDACTED] cell phone. Detective Freeman was present while [REDACTED] spoke with Bonhomme. After the conversation, [REDACTED] told Detective Freeman that Bonhomme just told him that something went bad last night and he needed a place to stay. [REDACTED] and Bonhomme were subsequently located 4419 N. Wheeling Avenue, Kansas City, Missouri and taken into custody.

[REDACTED] was interviewed by Detective Steve Schmidli on 07/26/2016. Upon questioning [REDACTED] initially denied she knew the reason for being interviewed. [REDACTED] subsequently admitted to going to the victim and [REDACTED]'s residence with [REDACTED] on Sunday in reference to a drug transaction. [REDACTED] advised there was a large quantity of drugs at the residence and after the transaction she and [REDACTED] left. [REDACTED] advised that on the day of this incident, 07/25/2016, Bonhomme spoke with [REDACTED] on the phone at about 1930 hours. [REDACTED] advised she did not know the substance of the conversation. [REDACTED] advised [REDACTED] was with Bonhomme and the two ended up leaving in [REDACTED] mother's white Chrysler newer model mini-van at about 2100 hours. [REDACTED] advised Bonhomme returned home at about 2300 and [REDACTED] was not with him. [REDACTED] advised Bonhomme woke her up and told her he was home. [REDACTED] advised that on 07/26/2016, she noticed Bonhomme was acting "funny all day." [REDACTED] advised she confronted Bonhomme. [REDACTED] advised that Bonhomme told her that "I fucked up." [REDACTED] advised Bonhomme told her that he and [REDACTED]

went to the victim's residence the night before. [REDACTED] advised Bonhomme told her he knocked on the door and the residents opened the door a crack. [REDACTED] advised Bonhomme told her that [REDACTED] tried to push open the door. During the struggle, [REDACTED] advised Bonhomme told her that he fell back and fired the gun into the door. Bonhomme advised he and [REDACTED] got scared and left.

On 07/27/2016, [REDACTED] was contacted and arrested at his residence. [REDACTED] was brought to Police Headquarters and interviewed by Detective Burris and Schmidli. After being read his Miranda rights, [REDACTED] admitted his and Bonhomme's involvement in this incident. [REDACTED] advised Bonhomme asked him to take him to purchase an ounce of marijuana from some "lames" [REDACTED] advised he drove his mother's white Chrysler Town & Country mini-van to Independence with Bonhomme. While en-route to Independence, [REDACTED] advised Bonhomme wanted to stop at his sister Jessica's house to pick-up a gun [REDACTED] advised Bonhomme stole a gun from his sister's house and they proceeded to the apartment. [REDACTED] advised Bonhomme knocked on the door and there was a verbal disagreement about Bonhomme owing the two males money. The disagreement escalated when Bonhomme removed the gun from his waistband and the two males shut the door. Bonhomme reportedly tried to push the door open with one hand while armed with a gun in the other hand. Bonhomme "punched" the door with the gun at which point, [REDACTED] stated he began to walk up the stairs leading to the apartment. [REDACTED] advised he heard a gunshot. [REDACTED] advised he and Bonhomme left the scene and turned northbound on Noland Road. [REDACTED] advised Bonhomme apparently threatened the safety of his family if he told anyone. [REDACTED] advised he took Bonhomme back to his sister's house because she had found out about the gun. Bonhomme apparently returned the gun to his sister and he told her what happened [REDACTED] advised he then drove himself and Bonhomme back to his apartment. Detectives escorted [REDACTED] to Bonhomme's sister's residence (8717 E. Independence Ave, Kansas City Mo 64125). He advised that he was positive that this was the residence that Bonhomme acquired the handgun and then later returned the handgun.

On 07/27/16 Detective Burris interviewed Bonhomme. Bonhomme advised that he understood his rights but would not speak about the incident in question.

Detective Christopher Burris # 1401

Print Name

#1401
Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge