

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

Police# 16-050918
Prosecutor# 095433655
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Justin G Harrison
1414 E. 97th St., Apt. D
Kansas City, MO 64131
DOB: 07/26/1989; Race/Sex: B/M;
SS# [REDACTED]
Defendant.

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **Class A Felony of Murder in the First Degree** punishable upon conviction under Section 565.020, RSMo, in that on or about July 14, 2016, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Javon Looney by shooting him.

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 July 14, 2016, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder 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 Murder 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 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.

Count III. Assault 1st Degree - Serious Physical Injury (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 July 14, 2016, in the County of Jackson, State of Missouri, the defendant shot at [REDACTED] and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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 IV. 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 14, 2016, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count III, 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 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.

THE STATE OF MISSOURI

vs.

Justin G Harrison

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Trisha Lacey (#55710)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, Missouri 64106
TLacey@jacksongov.org

WITNESSES:

PO David A. Adair, 1125 Locust, Kansas City, MO 64106

██
DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106

DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106

DET Ray H. Lenoir, 1125 Locust, Kansas City, MO 64106

Javon A Looney, Prosecuting Atty. Office, Kansas City, MO 64106

██
DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106

██
PO Devon B. Stewart, 1125 Locust, Kansas City, MO 64106

DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

DET Dawn N. Wilson, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 8/4/16

CRN: 16-050918

I, Det. Ray Lenoir of the Kansas City Missouri Police Department
(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 07/14/16, at 5704 E. 39th St. in
(Date) (Address)

Kansas City, Jackson Missouri Justin L. Harrison
(County) (Name of Offender(s))

B/M, 07/26/1989 SSN [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 7/14/2016 at 10:29 p.m. Kansas City Missouri officers were investigating a disturbance at 5353 E. 39th. St., Kansas City, Jackson, Missouri. The disturbance was involving [REDACTED], her estranged husband, Javon Looney, b/m, 07/13/79 and [REDACTED]. During the disturbance, Javon Looney and [REDACTED] became involved in a physical altercation with [REDACTED] but left that location prior to the officer's arrival. Upon arrival, the officers contacted [REDACTED] who advised that she had been assaulted by [REDACTED] and that [REDACTED] and Javon Looney had left and responded to 5704 E. 39th St., Kansas City, Jackson, Missouri. The officers then responded to that location where they made contact with Javon Looney and [REDACTED]. After speaking with Looney and [REDACTED], the officers returned to 5353 E. 39th St. to review video at that location. While at 5353 E. 39th St., they heard the sound of multiple gunshots being fired from the area of 5704 E. 39th. At approximately 2251 pm, Officers were advised that a shooting call had just come into the 911 call center for the address of 5704 E. 39th.

Upon responding to 5704 E. 39th officers discovered Javon Looney and [REDACTED] to both have been shot multiple times. Both were transported to area hospitals where Javon Looney died from his injuries.

Witnesses at the scene advised that just after the officers left from that address, a green Pontiac Firebird pulled up and a male exited the vehicle carrying a handgun in his hand. The male walked up to the victims and after words were exchanged, the male shot the victims several times. The male then got back into the Firebird and started to leave. The Firebird then stopped and the male got back out of the car. He approached the victims again and began shooting at them again. He then got back into the green Pontiac Firebird and drove west. A witness at the scene described the shooter as a black male with dreads in his hair and wearing eye glasses. A second witness added that the shooter was wearing a striped shirt.

Detectives interviewed [REDACTED]. During her interview, [REDACTED] was asked if she had contacted anyone after the confrontation with the victims. She indicated that she had and gave detectives permission to look at her cell phone.

PROBABLE CAUSE STATEMENT FORM

CRN 16-050918

Detectives downloaded [REDACTED]'s cell phone at which time they found that she had placed the 9-1-1 call at 2227 hours and after that call she had made two more phone calls. One call was to a [REDACTED] who is the victim, Javon's, mother. The second phone call was to the number 816-876-1461. Detectives further noted that prior to calling 9-1-1, 8 more calls to that same 816-876-1461 number were made from [REDACTED]'s phone. One call made to that number prior to the 9-1-1 call was made at 2210 p.m. and lasted for 7 minutes.

Detectives ran several search engines attempting to identify the owner of the number 816-876-1461. When running this number in Facebook, it was found to belong to a person by the name of **Justin Harrison**, b/m. Photos of Harrison from April 2016 show him to have his hair in dreads and to wear eyeglasses. A court order was obtained for the cell phone subscriber information on this number. The information obtained from the cell phone company showed that the subscriber was **Justin Harrison**.

Detectives reviewed the video at 5353 E. 39th St. and observed [REDACTED] and several parties at the business. One of the parties associating with the group was a black male with his hair in dreads, eyeglasses and he was wearing a dark T-shirt with a photo on the front of a male in a striped shirt. This male was observed to be inside and outside 5353 E. 39th St. during the time of the listed assault and shortly thereafter.

Detectives contacted two of the females who were in the video and were associates of [REDACTED]. Both witnesses advised that they responded to 5353 E. 39th St. where they contacted [REDACTED]. [REDACTED] had contacted one of the witnesses and advised that she needed assistance because her and her husband, Javon Looney, was involved in a disturbance. While there, they witnessed [REDACTED] and [REDACTED] become involved in a fight. The witnesses further advised that at the time, [REDACTED] was in the company of some friends. The witnesses identified the black male with the dreads and eyeglasses as one of [REDACTED]'s friends. The witness stated that she heard this male say to [REDACTED] "Why did you call the police, we are going to take care of this ourselves."

While reviewing the aforementioned video, detectives observed a green Firebird arrive and pull into the parking lot at 5353 E. 39th St several minutes after the fight. The green Firebird was driven by an unknown black wearing a white T-shirt and he is seen to exit the vehicle and walk out of camera view. Moments later, the unknown black male returns to the Firebird and gets back into the driver's seat. The black male with dreads and eyeglasses walks up to the Firebird and gets into the front passenger seat and the vehicle is observed driving off the lot and turning east on 39th St. at approximately 2243 pm..

On 07/23/2016, detectives contacted [REDACTED] at an area hospital where she was being treated for the multiple gunshot wounds she sustained in this assault. [REDACTED] had gone through several surgeries and had just had the intubation tube removed in order to talk. The detectives presented [REDACTED] with a photo-lineup that included a photograph of **Justin Harrison, bm, 07/26/1989**. [REDACTED] identified **Harrison** as the person that shot her and Javon Looney. [REDACTED] stated that she knew **Harrison** by the name of "Bones" and that he was an associate of Looney's. Prior to the shooting she had seen him at the business 5353 E. 39th prior to her and [REDACTED]'s fight. [REDACTED] stated that in the moments before the shooting, Harrison approached her and Javon and he and Javon began arguing. Harrison suddenly took out an unknown handgun began shooting at both of them.

PROBABLE CAUSE STATEMENT FORM

CRN 16-050918 _____

Printed Name Ray H. Lenoir Sr. Signature  # 3625

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

Judge

Circuit Court of _____ County, State of Missouri.