


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

POLICE NO. :	18003708
PROSECUTOR NO. :	095447269
OCN:	

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
 GREGORY E. SMITH)
 8023 E. 130th St.) **CASE NO. 1816-CR**
 Grandview, MO 64030) **DIVISION**
 DOB: 10/06/1993)
 Race/Sex: B/M)
 )
 DEFENDANT.)

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 August 6, 2018, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, with the purpose of causing serious physical injury to Dennis M Gordon caused the death of Dennis M Gordon 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 (571.015-001Y19755212.0)

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 August 6, 2018, in the County of Jackson, State of

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Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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.

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/ Bryan O. Covinsky

Bryan O. Covinsky (#47132)
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WITNESSES:

1. DET Beau D. Bailey, 1200 Main Street, Grandview, MO 64030

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2. [REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

■ [REDACTED] O

64106

6. Dennis M Gordon, 14027 Dornoch, Grandview, MO 64030

7. DET Brian Poynter, 1200 Main Street, Grandview, MO 64030

8. SGT Dean Van Winkle, 1200 Main Street, Grandview, MO 64030

REPORT NUMBER 18003708
GRANDVIEW STATEMENT OF PROBABLE CAUSE

I, Detective Brian Poynter, 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 08/06/18 at 1249 hours, at White Ave and High Grove Road, Grandview, Jackson County, Missouri, Gregory Eugene Smith B/M 10/06/1993 [REDACTED] committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 08/06/2018 at approximately 1249 hours, Grandview Officers responded to the intersection of White Ave and High Grove Road in regard to a reported shooting with a party down. Officer located an unconscious male (Dennis Maurice Gordon Jr. B/M 07/10/77) with an apparent gunshot wound to the chest. Another male [REDACTED] B/M 01/25/77 was holding Gordon as Officers arrived and advised that a male in a dark green 4 door sedan shot Gordon. Gordon was declared deceased on scene from an apparent gunshot wound. Grandview Detectives Responded to and processed the scene and the Jackson County Medical Examiner responded to take custody of the body.

[REDACTED] was transported to the Grandview Police Station to have a formal interview. During the interview, [REDACTED] said that he and Gordon were going to the gas station when "Dude" pulled up and shot Gordon. [REDACTED] was asked who "Dude" was and for a description said a tall Mexican Italian male that Gordon had been in a fight with at 7-Eleven a couple weeks ago and was the driver of the vehicle. Detectives located GVPD report #18003535 in which officers responded to 7-Eleven regarding a fight in progress (on 07/29/18). The report indicated that both Gordon and [REDACTED] were present along with [REDACTED] B/M 09/26/74 and Gregory E Smith B/M 10/06/93. [REDACTED] was asked if he could identify the male if he saw him again and he said that he could. A photo lineup was created that included Gregory and [REDACTED] selected the photo of Gregory as the driver of the green sedan. [REDACTED] described the passenger as a black male with short braids.


Security Video was recovered from 13100 Spring Street (Discount Smokes and Liquor) that showed a dark 4 door vehicle pull into the parking lot at 1244 hours on 08/06/2018. The driver of the vehicle goes into the store and is recorded on camera wearing a gray t-shirt with a blue "15" written on the front. The dark shoes worn by the male in the gray shirt have a very pronounced line across the heel wrapping around the laces. The driver is similar in appearance to Gregory and when compared to the dash cam footage of Officers at 7-Eleven on 07/29/18 when Gregory was contacted for the fight. The driver buys something with change and then gets back into the 4 door sedan and pulls out of the parking lot and north onto White Ave at approximately 1247 hours.

More security video footage was recovered from 1805 High Grove Road. It should be noted that the time on the cameras is incorrect and is one hour behind the actual time. The footage showed a dark in color sedan driving north on White Ave at 11:47:25 hours (video time). The video shows [REDACTED] and Gordon walk into the frame south on White Ave at 11:47:53 hours (video time). The two walk just out of frame and the dark sedan is observed driving south back down White Ave at 11:48:10 hours (video time). The dark sedan drives out of frame and then is seen traveling east on High Grove Rd at 11:48:28.

A DOR check showed Gregory's address as 6404 E 129th Street, Grandview MO. Detectives drove by the residence on 08/07/18 at approximately 1000 hours and located a dark green KIA (MO YK8N8D). The vehicle appeared to be the vehicle observed in the surveillance video from Discount Smokes and 1805 High Grove.

A search warrant was obtained for 6404 E 129th Street and for the green KIA. Grandview Police executed the search warrant and located Gregory inside. Gregory exited the residence and was taken into custody. Also inside the residence was Gregory's [REDACTED] said that she was the owner of the green KIA and that Gregory and [REDACTED] B/M 10/14/88 left in her KIA on 08/06/2018 just after noon. [REDACTED] said the two were gone for about an hour and returned home.

During the search warrant, a gray t-shirt with "15" written on the front was recovered. A SCCY CPX2 9mm (589822) with a magazine containing three 9mm rounds was recovered from the coat closet near the front door and a Taurus PT11 G2 9mm handgun was surrendered to Detectives by the home owner following the search warrant. The Taurus was located in an uninvolved vehicle. When Gregory was taken into custody he was wearing black shoes with multi colored Nike symbols and straps that when combined appear to be the line wrapping around the shoe.



DETECTIVE

THE COURT FINDS PROBABLE CAUSE.

JUDGE

DATE

(ATTACH ADDITIONAL SHEET(S) IF NEEDED)