

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

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| POLICE NO. : | 17-063920 |
| PROSECUTOR NO. : | 095444344 |
| OCN: | |

| | | |
|------------------------------|-------------------|-------------------------|
| STATE OF MISSOURI, |) | |
| | PLAINTIFF, |) |
| vs. |) | |
| |) | |
| FELIPE REYNA JR. |) | |
| 2040 Lawn Ave. |) | CASE NO. 1816-CR |
| Kansas City, MO 64127 |) | DIVISION |
| DOB: 10/14/1989 |) | |
| Race/Sex: W/M |) | |
| [REDACTED] |) | |
| | 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 July 21, 2017, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Charles Williams, caused the death of Charles Williams 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.

State vs. Felipe Reyna Jr.

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 21, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, as charged in Count I, all allegations of which are incorporated here 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.

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/ P. Benjamin Cox
P. Benjamin Cox (#60757)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, MO 64106
(816) 881-3975
BCox@jacksongov.org

State vs. Felipe Reyna Jr.

WITNESSES:

1. CST Allison Bennett, 1125 Locust, Kansas City, MO 64106
2. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
3. PO Justin Boydston, 1125 Locust, Kansas City, MO 64106
4. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
City, MO 64106
6. [REDACTED]
[REDACTED]
[REDACTED]
9. [REDACTED] Michael B. Luster, 1125 Locust, Kansas City, MO 64106
9. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
10. DET Mark A. Slater, 1125 Locust, Kansas City, MO 64106
11. DET Christopher S. Smith,
12. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106
13. [REDACTED]
14. Charles Williams, 2534 Van Brunt Blvd, Kansas City, MO 64127
15. [REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 02/13/2018

CRN: 17-63920

I, Det. Darin Penrod #4288
(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 07/21/2017, at 2534 Van Brunt Boulevard in
(Date) (Address)

Kansas City, Jackson Missouri Felipe Reyna Jr.
(County) (Name of Offender(s))

WM, DOB 10/14/89, [REDACTED] 5'09", 200 lbs, committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 07/21/2017, officers of the Kansas City, Missouri Police Department were dispatched to 2534 Van Brunt Boulevard, Kansas City, Jackson County, Missouri in regard to a shooting. Upon arrival, the victim, a 31 year old male, was discovered deceased on the kitchen floor of the residence suffering from apparent gunshot wounds. One of the wounds on the victim was consistent with damage that would be caused by a shotgun. The victim also had wounds consistent with damaged caused by bullets. Two spent bullets were recovered from the victim's body. Spent 9mm shell casings were recovered at the scene. The Jackson County Medical Examiner's office ruled his death a homicide.

A witness was contacted at the scene of this offense and transported to Police Headquarters where they provided a formal statement to detectives. The witness stated just prior to the shooting, she was standing outside 2534 Van Brunt and observed five individuals walking up to the front door of the residence. The witness positively identified three of the individuals. One of the individuals she identified was Felipe Reyna Jr., WM, 10/14/1989. The witness stated Reyna was carrying what she described as a "sawed off shotgun". The witness walked north of the address on the sidewalk but could hear the victim's voice from the front porch as he was arguing with these individuals. The witness then heard several gunshots after which the individuals ran back to their vehicles which had been parked in front of the address and sped off north on Van Brunt. The witness also identified [REDACTED] WM, 08/15/90 as one of the individuals she had observed walking up to the residence. She described [REDACTED] carrying an unknown weapon.

On 07/27/2017, a search warrant was served at 4804 E. 7th St., a residence Reyna and [REDACTED] are known to frequent. Two occupants of that residence provided formal statements to detectives. Both occupants stated in a face to face conversation with Felipe Reyna he admitted to them he had shot the victim with a shotgun. One of the occupants stated Reyna told them the other shooter was a white male Reyna called [REDACTED]. [REDACTED] was identified through a search of police databases [REDACTED], WM, 08/26/93.

On 08/09/2017, [REDACTED] was questioned at Police Headquarters after being advised of his rights per *Miranda*. [REDACTED] admitted to being present when this offense was committed. On the day of the homicide, he arrived at the victim's residence reportedly to smoke methamphetamines. [REDACTED] advised Felipe Reyna, [REDACTED] and a female, [REDACTED], were already there. [REDACTED] stated Reyna was sitting on the railing of the front porch and [REDACTED] was standing on the steps in front of the front entrance door. [REDACTED] said he

PROBABLE CAUSE STATEMENT FORM

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and [redacted] were speaking in the front yard [redacted] told him the victim had a pair of shoes which belonged to her he would not return. [redacted] advised the victim was standing outside the front door and was animated, but not threatening towards anyone. He then observed Reyna suddenly produce a sawed off double barreled shotgun and shoot the victim one time. [redacted] stated [redacted] then produced a handgun and fired several rounds at the victim. [redacted] described the handgun as black in color with "a little bit of silver" [redacted] stated the victim had no weapons in his hands and had not made any threatening movements towards Reyna or [redacted]. [redacted] advised he ran to his car and fled the scene. Reyna responded to his residence later that night and told him to never speak of what happened. [redacted] stated he knows [redacted] to own and carry a 9mm handgun.

Felipe Reyna was arrested on unrelated charges by the Saline County Sheriff's Department. On 08/02/2017, he was questioned by detectives after being advised of his rights per Miranda. Reyna denied any involvement in this offense but when pressed stated he would talk if his lawyer were present. When asked if he were looking to make a deal, Reyna replied "Yeah".

On 08/10/2017 [redacted] was arrested on a stop order and transported to Police Headquarters. He declined to make a statement regarding this investigation.

Printed Name /S/ Det. Darin Penrod #4288

Signature

[Handwritten Signature] 4288

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

Judge

Circuit Court of _____ County, State of Missouri.