


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

<b>POLICE NO. :</b>	18-095293
<b>PROSECUTOR NO. :</b>	095449741
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>JUNIUS R MORROW</b>	)	
<b>3601 Fremont Ave.</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64127</b>	)	<b>DIVISION</b>
<b>DOB: 11/08/1988</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	<b>DEFENDANT.</b>	)

**COMPLAINT**

**Count I. Unlawful Use of Weapon - Subsection 4 - Exhibiting  
(571.030-010Y20175299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **Class E Felony of Unlawful Use of a Weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 10, 2018, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a firearm, to wit a Smith and Wesson, Model SD40, .40 caliber handgun, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

**State vs. Junius R Morrow****Count II. Murder 2<sup>nd</sup> Degree (565.021-001Y19840905.0)**

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 December 10, 2018, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Anthony Page caused the death of Anthony Page 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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

**Count III. 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 December 10, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second 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 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.

**State vs. Junius R Morrow****Count IV. Unlawful Use of Weapon - Subsection 4 - Exhibiting  
(571.030-010Y20175299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **Class E Felony of Unlawful Use of a Weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 11, 2018, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons, a firearm, to wit a Smith and Wesson, Model SD40, .40 caliber handgun, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

**Count V. Domestic Assault - 3<sup>rd</sup> Degree (565.074-003Y20171399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.074, RSMo, committed the **Class E Felony of Domestic Assault in the Third Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 11, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused physical pain to [REDACTED] by striking her with a closet hanger, and [REDACTED] and defendant were family or household members in that [REDACTED] and the defendant were persons who had been in a continuing social relationship of a romantic or intimate nature.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

**State vs. Junius R Morrow****Count VI. Kidnapping - Facilitating a Felony - Inflicting Injury - Terrorizing - 1<sup>st</sup> Degree (565.110-002Y19501099.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the **Class B Felony of Kidnapping in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 11, 2018, in the County of Jackson, State of Missouri, defendant unlawfully confined [REDACTED] for a substantial period, without [REDACTED] consent as a result of forcible compulsion for the purpose of facilitating flight after the commission of the felony of Unlawful Use of a Weapon.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

**Count VII. 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 December 11, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Kidnapping in the First Degree charged in Count VI, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Kidnapping 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.

**State vs. Junius R Morrow****Count VIII. Unlawful Possession of a Firearm (571.070-001Y20175212.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **Class D Felony of Unlawful Possession of a Firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or between December 10 and December 12, 2018, in the County of Jackson, State of Missouri, the defendant knowingly possessed a firearm, to wit a Smith and Wesson, Model SD40, .40 caliber handgun, and on October 20, 2008, the defendant was convicted of the felony of Tampering in the First Degree in the Circuit Court of Jackson County, Missouri, in case number 0716-CR05758-01.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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/ Sarah A. Castle*  
Sarah A. Castle (#64770)  
Assistant Prosecuting Attorney  
415 East 12th Street, 11th Floor  
Kansas City, MO 64106  
(816) 881-3517  
scastle@jacksongov.org

**WITNESSES:**

1. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
2. SGT Thomas T. Dearing, 1125 Locust, Kansas City, MO 64106
3. SGT William F. Dillingham, 1125 Locust, Kansas City, MO 64106
4. DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127

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5. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
6. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
7. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
8. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
9. DET Mark A. Slater, 1125 Locust, Kansas City, MO 64106
10. DET Christopher S. Smith, 1125 Locust, Kansas City, MO 64106
11. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106
12. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 12-13-2018

CRN: 18-95101, 95293

I, Detective Mark A. Slater #5206 Kansas City Missouri Police Department Homicide Unit  
(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 12-10-2018, at 4608 Chelsea Ave in  
(Date) (Address)

Kansas City, Jackson Missouri Junius Morrow  
(County) (Name of Offender(s))

B/M, 11-08-1988 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 12-10-2018 at approximately 2031 hours, officers of the Kansas City Missouri Police Department responded to [REDACTED] on a reported, "Sounds of Shots" call for service which was updated to a, "Shooting" call for service. Upon arrival officers discovered the victim deceased inside the aforementioned address. While on scene officers made contact with several witnesses who stated they were inside the residence when the homicide occurred and an additional witness who stated he was standing on his front porch as the suspect fired several rounds into the victim's residence and then fled the scene. The death is being investigated as a homicide.

On 12-10-2018 at approximately 2130 hours, detectives arrived on scene and made contact with the aforementioned witnesses who provided formal statements to detectives about the events surrounding the homicide. The witnesses inside the victim's residence at the time of the homicide stated they were standing just inside the front door when the suspect knocked on the door, the victim asked who it was but, did not receive a response. The victim opened the door and the suspect pointed a handgun at the victim. Based on statements provided detectives believe the victim attempted to deflect the barrel of the handgun. The suspect however, fired the weapon several times killing the victim and then fled the area.

An additional witness was contacted who stated he was inside his residence when he heard approximately 4 gunshots. The witness looked outside and observed a heavy set, black male wearing a black hooded sweatshirt and blue jeans firing a semi-automatic handgun with an extended magazine into to the victim's residence. The witness estimated the suspect fired approximately 6-7 rounds total and then fled the area south bound on foot to a dark in color Chevrolet Avalanche truck which was waiting for him a few houses to the south. The witness stated the aforementioned truck backed up a short distance and the suspect entered the vehicle on the left rear passenger side. The vehicle then fled southbound on Chelsea Ave. The witness described the suspect as being a heavy set black male similar in appearance to the victim. The witness additionally stated the suspect was wearing a black hoodie and blue jeans.

**PROBABLE CAUSE STATEMENT FORM**

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During the course of the interview with witnesses and friends of the victim, the reporting detective learned the victim had been having problems with an individual using the moniker, "Fat Boy." Associates of the victim stated Fat Boy stole the victim's vehicle several weeks prior at the Blue Valley Market located at 43<sup>rd</sup> and Cleveland Ave and in the process stole one of the victim's firearms. The victim filed a police report with the Kansas City, Missouri Police department and listed "Fat Boy" as the suspect in the auto theft. The victim's live in girlfriend stated two days before the homicide, "Fat Boy" came over to the victim's house and spoke with her daughter and attempted to talk his way into the residence but, was not allowed access. "Fat Boy" was subsequently formally identified through police reports and interviews as Junius Morrow B/M 11-08-88.

On 12-11-2018 detectives learned that Morrow was identified as the suspect in an Aggravated Domestic Assault and Kidnapping. During the course of the commission of the domestic assault and kidnapping the victim's stated Morrow produced a handgun similar in appearance to the one described in the commission of the homicide. Morrow physically assaulted his girlfriend and her daughter, threatened them with the aforementioned handgun and then forced the neighbor at gunpoint to drive him away from the scene of the assault in an effort to avoid the police. Detectives interviewed the victims of the aforementioned offenses. The victims provided formal statements to detectives. The victims positively identified Junius Morrow as the individual that pointed a semiautomatic handgun with and extended magazine at them and threatened them and forced one victim to drive him away from the scene of a crime.

On 12-12-2018 detectives learned that Morrow was at his mother's residence located at [REDACTED]. Officers and detectives responded to that location and took Morrow into custody after a brief struggle. Morrow was in possession of a semiautomatic handgun with and extended magazine at the time of his arrest and dropped a cellular telephone just prior to being taken into police custody. Family members at the scene stated that both the handgun and the cell phone belonged to Morrow and further stated that on 12-10-2018 Morrow was at his mother's address and brandished the aforementioned handgun at his brother and threatened to "Pistol Whip" him with the handgun. Additionally, the handgun was loaded with ammunition that was the same type and head stamp as the casings discovered at the homicide scene and at the scene of the domestic violence assault.

On 12-12-2018 at approximately 1824 hours, detectives made contact with Morrow at the East Patrol Station. Morrow was advised of his Miranda Rights which he waived stating he would speak with detectives. Morrow admitted to being at the victim's residence at the time of the domestic violence assault but, denied ever assaulting anyone, brandishing a handgun or forcing anyone to drive him away from the scene at gunpoint. Additionally, Morrow denied ever being in possession of a firearm including at the time of his arrest. Morrow admitted that he was a felon during the course of the interview with detectives. Morrow denied being in the area of the homicide and stated on the evening of the homicide he was at his girlfriend's residence all night which is located at [REDACTED]. When asked, Morrow stated he does not own a vehicle and has to get rides from others.



**PROBABLE CAUSE STATEMENT FORM**

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A comparison of the handgun in Morrow's possession at the time of his arrest was made against the casings recovered at the scene of the homicide. Firearm technicians from the Kansas City, Missouri Regional Crime Lab confirmed that the casings from the homicide scene matched the weapon taken from Morrow at the time of his arrest.

Printed Name Detective Mark A.Slater #5206 Signature /s/ Det. Mark A. Slater

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.