


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

POLICE NO. :	19-020298
PROSECUTOR NO. :	095451642
OCN:	hs008369

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
JAMES JONES)	
3427 Askew Avenue)	CASE NO. 1916-CR
Kansas City, MO 64128)	DIVISION
DOB: 06/25/1987)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 15, 2018, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of Family Dollar, and in the course thereof the defendant was armed with a deadly weapon.

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 December 15, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery 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 Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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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. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about January 24, 2019, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of Family Dollar, and in the course thereof defendant, was armed with a deadly weapon.

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 (571.015-001Y19755212.0)

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 January 24, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery 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 Robbery 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,

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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 V. Attempted Robbery - 1st Degree (570.023-001Y20171299.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about February 2, 2019, in the County of Jackson, State of Missouri, the defendant tried to forcibly steal U.S. currency in the possession of Family Dollar, and in the course thereof defendant threatened the use of what appeared to be a deadly weapon and such conduct was a substantial step toward the commission of the offense of robbery in the first degree.

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.

Count VI. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about February 2, 2019, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. Currency in the possession of Family Dollar, and in the course thereof defendant was armed with a deadly weapon.

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.

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Count VII. 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 February 2, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery 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 Robbery 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 VIII. Robbery - 1st Degree (570.023-001Y20171299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 1, 2019, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of Family Dollar, and in the course thereof defendant threatened the use of what appeared to be a deadly weapon.

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.

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Count IX. Attempted Robbery - 1st Degree (570.023-001Y20171299.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 20, 2019, in the County of Jackson, State of Missouri, defendant tried to forcibly steal U.S. currency in the possession of Family Dollar, and in the course thereof defendant threatened the use of what appeared to be a deadly weapon and such conduct was a substantial step toward the commission of the offense of robbery in the first degree.

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.

Count X. 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 about February 2, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a handgun, a firearm, and on 07/07/2006 the defendant was convicted of the felony of Robbery in the Second Degree in the Jackson County.

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/ Nichole Erickson

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Nichole Erickson (#52086)
Assistant Prosecuting Attorney
415 E. 12th Street, 11th Fl
Kansas City, MO 64106
(816) 881-3345
NErickson@jacksongov.org

WITNESSES:

1. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. Family Dollar, 3017 Prospect, Kansas City, MO 64128
3. DET Thomas P. Komoroski, 2256 Locust, Kansas City, MO 64106
4. PO Larryn M. Lewis, 1125 Locust, Kansas City, MO 64106
5. [REDACTED] E 12th St, Floor 11, Kansas City, MO 64106
6. DET James Manley, 1125 Locust, Kansas City, MO 64106
7. Family Dollar, 4601 E. Truman, Kansas City, MO 64128

PROBABLE CAUSE STATEMENT FORM

Date: 3/20/2019

CRN: 19-20298, 18-96520,

I, Detective Thomas Komoroski #5579, 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 3/20/2019, at 3017 Prospect Ave in
(Date) (Address)

Kansas City, Jackson Missouri Jones, James A
(County) (Name of Offender(s))

BM 6/25/2987 committed one or more criminal offense(s).
(Description of Identity)

**Robbery
Armed Criminal Action
Felon in Possession of a Firearm**

The facts supporting this belief are as follows:

(18-96520) On 12-15-2018 at 2007 hours, the Family Dollar located at 3017 Prospect Ave was robbed at gunpoint by a tall, heavy set black male wearing a black hooded sweatshirt with a small white logo in the upper left chest, white t-shirt, black sweatpants, black shoes, gloves, and a white surgical mask covering this face. The suspect was also wearing a gray/pink/black/white backpack. The suspect brandished a silver handgun and demanded the employee empty the cash register. The suspect approached and fled on foot from the northeast.

(19-6204) On 1-24-2019 at 0846 hours, the Family Dollar located at 3017 Prospect Ave was robbed at gunpoint by a tall, heavy set black male wearing a black hooded sweatshirt with a small white logo in the upper left chest, dark sweatpants, black shoes, white gloves, with a black mask covering his face. The suspect was armed with a silver handgun. He arrived and fled on foot from the area of 30 St and Prospect Ave.

(19-8650) On 2-2-2019 at 1848 hours, an attempted robbery occurred at the Family Dollar located at 4601 E Truman Rd. The suspect approached an employee outside and instructed him to give him the money in the cash register. The employee observed what appeared to be a handgun in the suspect's pocket. The employee refused to re-enter the business. The suspect was a tall, heavy set black male wearing a black hooded sweatshirt with a small white logo in the upper left chest, white t-shirt, black sweatpants, black shoes, white gloves, with a black mask covering his face.

(19-8654) On 2-2-2019 at 1912 hours, an armed robbery occurred at the Family Dollar at 3017 Prospect Ave. A tall, heavy set black male wearing a black hooded sweatshirt with a small white logo in the upper left chest, white t-shirt, black sweatpants, black shoes, white gloves, with a black mask covering his face entered the business, brandished a black handgun and demanded the employee empty the cash register into a purple bag or backpack he was carrying. The suspect arrived and fled on foot towards the northeast.

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(19-8650) Video surveillance from the first incident on 2-2-2019 at Family Dollar on Truman Rd captured the suspect arriving in a black sedan with tinted windows. The vehicle had a brake light on the bottom of the rear windshield and an illuminated license plate on the lower part of the rear bumper. The vehicle drove north on Elmwood, east on Truman Rd, and then southbound on Lawn Ave. The vehicle parked approximately 50 yards south of the Family Dollar. The suspect exited the passenger side of the vehicle (a black sedan with tinted windows) at 1835 hours, walked west on Truman Rd past the Family Dollar. After pacing around the neighboring business for several minutes, the suspect approached the employee in front of the business at 1848 hours. He immediately returned to suspect vehicle, enters the passenger side and fled southbound at 1850 hours.

(19-08654) Upon further investigation of the robbery on 2-2-2019 at the Family Dollar on Prospect Ave the License Plate reader at 31 St and Prospect was reviewed. The License Plate reader captured 240 license plates on 2-2-2019 between 1850 hours and 1915 hours, which was the time of the attempted robbery. One vehicle matched the description of the black sedan from the other robbery on 2-2-2019. The vehicle was a black 2006 Chrysler 300 with Kansas license plate 332-KLN. Video cameras in the area captured the Chrysler traveling westbound on Linwood towards Prospect Ave at 1859 hours. The vehicle turns northbound onto Prospect and continues north across 31 St and past the Family Dollar at 3017 Prospect Ave. As the vehicle approaches 30 St, its brake lights appear to activate as if it may be slowing to make a turn onto 30 St. Due to the distance from the camera and the darkness, the Chrysler is not captured turning onto 30 St. Video surveillance at 27 St and Prospect confirmed the Chrysler 300 does not continue northbound to 27 St.

(18-96520) A check of the License Plate Reader from 12-15-2018, near the time of the robbery at Family Dollar on Prospect, also captured the Black Chrysler 300 with Kansas License 332KLN driving in the direction of 3017 Prospect (north on Indiana at 31 St) at 1938 hours on 12-15-2018. The License Plate Reader did not capture that plate again that evening.

A computer check of the license plate 332-KLN (Kansas) responded back as registered to James Anthony Jones black male 6-25-1987. Missouri DOR lists Jones as 6-00 and 260 lbs.

A search of Jones revealed he was arrested and charged with 6 business robberies from 2014 (14-51678, 14-57186, 14-57196, 14-57196, 14-63078, 14-65215, 14-67049) and suspected in several other robberies. During several of the robberies in 2014 Jones wore the same green hooded sweatshirt with a white surgical mask or other mask covering his face. Jones was eventually identified by tattoos that were observed on his hands. During several of the robberies Jones was observed pacing outside the business for several minutes prior to the robbery.

A phone order for Jones phone number was obtained and the historical data was compared the dates and times of the listed robberies. The phone number was not used in close proximity to time of the robberies and phone could not eliminate Jones as being at the location of the robberies. A comparison of the data to several license plate reads of the black Chrysler (KS 332-KLN) on 2-2-2019 indicated there was a high likelihood that the phone was inside the vehicle on the day of the robberies on 2-2-2019.

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On 3-1-2019 at 0808 hours, the family dollar at 3017 was robbed again. The suspect fit the description of the previous robberies. During this robbery the suspect wore a black hooded sweatshirt with a white Nike "swoosh" on the left arm, and what appeared to be the same black sweatpants, a black mask and gloves. The suspect again had what appeared to be a handgun in his pocket and had the employee empty the cash register into a blue/purple bag. The suspect fled on foot to the northeast towards 30 St and Montgall Ave. A check of the License Plate Reader again on 3-1-2019 captured the Black Chrysler (332-KLN) at 31 St and Prospect Ave at Prospect Ave at 0800 hours (several minutes before the robbery). Cameras at the 31 St and Prospect Ave captured the vehicle driving northbound past the Family Dollar and turn eastbound onto 30 St.

Jones used the address of 3427 Askew Ave in several reports from 2018. His vehicle (black Chrysler 300) was observed parked outside the residence on several occasions, including an hour after the robbery on 3-1-2019. Surveillance was conducted on the residence and Jones was observed arriving and leaving several times in a black Nike jacket with a white swoosh on the left arm which matches the jacket worn in the robbery on 3-1-2019. Jones was also observed wearing black sweat pants with a white logo on the left leg. The pants matched the pants the suspect wore during several of the robberies.

A GPS warrant for the Chrysler was obtained on 3-1-2019.

(19-020298) On 3/20/2019 at 0908 hours, an individual walked into the Family Dollar at 3017 Prospect Ave and waved two employees towards the front register. The employees immediately recognized the individual as the same person who had robbed the store previously and refused to comply. The suspect left without any property. The suspect wore a black hooded sweatshirt with a small white logo in the upper left chest, white t-shirt, black sweatpants with a white emblem on his left leg, black shoes, white gloves, with a black mask covering his face which matched the description of the suspect and suspect clothing from previous robberies.

On 3/20/2019 surveillance cameras at 34th and Askew captured Jones leaving 3427 Askew Ave on at 0830 hours and returning to the address at 0913 hours in his black Chrysler 300. Jones was wearing the same clothes as the individual that entered the Family Dollar at 0908 hours. After returning at 0913 hours, Jones left the residence a short time later wearing different clothes. The GPS on the Chrysler showed the vehicle parked at 30 St and Montgall (a block to away from 3017 Prospect Ave) during the robbery

Jones was arrested on 3/20/2019 at 1715 Main. Jones was wearing black tennis shoes with white on the bottom and red soles that matched robbery suspect from 3/1/2019 (19-15393) and earlier in the day on 3/20/2019 (19-20298).

A search warrant was executed on 3427 Askew and two handguns matching the description of the suspect guns were located inside the residence. One handgun is silver with a black grip and the second handgun is black with a silver slide.

Jones vehicle was towed from 1715 Main to the city tow lot. A search warrant was executed on the black Chrysler. A black face mask, light colored latex gloves and a gray/pink/black/white backpack were located inside the vehicle.

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Jones was transported to Police Headquarters where he was interviewed by detectives. Jones denied leaving his house on 3/20/2019 prior to driving to work at approximately 1000 hours. Jones denied any knowledge of the handguns inside the residence.

Jones is a convicted felon in the State of Missouri and prohibited from possessing firearms. Jones was found guilty of Robbery in the 2nd degree on 7/7/2006 and received a sentence of 8 years confinement (0516CR0846201).

Printed Name Det Thomas Komoroski #5579 Signature /s/ Det Thomas Komoroski

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

Judge

Circuit Court of _____ County, State of Missouri.