

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

<b>POLICE NO. :</b>	19-036262
<b>PROSECUTOR NO. :</b>	095452743
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JOSHUA REESE</b>	)	
<b>305 Darrel Court, #6</b>	)	<b>CASE NO. 1916-CR</b>
<b>Liberty, MO 64068</b>	)	<b>DIVISION</b>
<b>DOB: 06/19/2001</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**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 May 17, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Charles Cecil caused the death of Charles Cecil 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 (571.015-001Y19755299.0)**

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 May 17, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in

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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.

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/ Katherine Baker Nelson  
Katherine Baker Nelson (#62733)  
Assistant Prosecuting Attorney  
415 E. 12th Street, 11th Floor  
Kansas City, MO 64106  
(816) 881-3560  
kj baker@jacksongov.org

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**WITNESSES:**

1. Charles S. Cecil, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 05-18-2019

CRN: KC19036262

I, Det K. Oldham # 5166

(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 05-17-2019, at 3509 Anderson Av in  
(Date) (Address)

Kansas City, Jackson Missouri Joshua Reese  
(County) (Name of Offender(s))

B/M, 06-19-2001 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 05-17-2019 at approximately 3:07 a.m., Officers were dispatched to 3509 Anderson Ave, Kansas City, Jackson County, Missouri on a reported shooting. Upon their arrival, they located a male and a female victim who appeared to suffer from apparent gun-shot wounds. Ten spent rifle shell casings were located at the scene. Paramedics responded to the scene and pronounced the male victim deceased. The female victim was transported to an area hospital for treatment of her injuries.

Detectives met with the victim who advised she was married to the deceased victim. She stated they had just been evicted from their residence and were homeless. They moved their belongings to a staircase located at 3509 Anderson Ave which is the address of an abandoned elementary school. The female advised she was lying under a tarp which was stretched across a wall of trash bags which contained their belongings. No firearms were located in the victim's belongings. It should be noted, that upon arrival officers located a kitchen knife in the hand of the deceased victim.

While under the tarp, she heard a male voice who she knew to be an African male by the name of Joseph which she and her husband had met earlier in the day. She advised she could tell Joseph was accompanied by several other individuals. She heard her husband say, "What are you going to do, shoot me?" She immediately heard multiple gun shots. The female victim was shot in the arm and had a piece of shrapnel in her face. The suspects fled the scene on foot. The female victim told initial responding officers that the suspects took her identification.

On 05-17-2019, [REDACTED] B/M, 01-01-98 contacted school resource officers at Northeast High School and advised he was present at the time of the homicide. It should be noted that [REDACTED] lives at 218 Askew Av which is less than a block from the scene of the homicide. [REDACTED] was transported to Police Headquarters at his request. On 05-17-2019, at approximately 1242 hrs, [REDACTED] signed the Miranda Waiver form and agreed to speak to detectives. [REDACTED] positively identified DOR photos of Joshua Reese B/M, 06-19-01 and [REDACTED] B/M, 9-22-99 as being present during the shooting. He also advised a black male by the name of [REDACTED] and an unknown white male were also present. [REDACTED] stated that there was an argument between [REDACTED] and the male victim regarding the price of a small amount of marijuana that the victim was going to sell to [REDACTED].

[REDACTED] and [REDACTED] returned to [REDACTED]'s residence at which time [REDACTED] advised he thought he could get the victim to come down on his price from \$15.00 to \$10.00. [REDACTED], [REDACTED]", Reese, [REDACTED] and the unknown white male returned to the stair case to talk to the victim. [REDACTED] advised Reese was armed with an AR-15 style rifle. He stated that when they arrived the victim reached for a knife that was in a bag. He stated [REDACTED] yelled that the victim was going for a "Strap." [REDACTED] advised Reese fired several rounds at the victim. All of the parties ran

PROBABLE CAUSE STATEMENT FORM

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from the scene to Reese’s vehicle which he described as a black or grey Ford Escape. Reese entered the driver’s seat and they fled the scene in the vehicle with the AR-15 style rifle.

██████████ was shown a photo of ██████████ W/M 6-20-2001 and identified the party as the white male he was talking about. He also stated ██████████ stated he would take the gun to his house.

On 05-17-2019, at approximately 1645 hrs., Reese and ██████████ B/M, 02-02-2000 were apprehended at 305 Darrell Ct, Liberty, Clay County, MO. At the time of their arrest members of the Career Criminal Unit observed he vehicle arrive being driven by Reese with ██████████ seated in the front passenger seat. Photos of the vehicle were shown to ██████████ and he confirmed this was the vehicle in which they fled the scene of the homicide and the vehicle in which he last saw the AR-15 style rifle.

On 05-17-2019, at approximately 2057 hrs. ██████████ was advised of his Miranda Rights and agreed to speak to detectives. ██████████ confessed that he was present during the homicide along with Reese, ██████████, ██████████ and a white male who he identified as ██████████ W/M, 06-20-2001. He advised that there was an argument over the price of marijuana that was being sold by the victim. When he could see they weren’t getting anywhere regarding the price he turned to walk away from the group. He then heard multiple gun shots. He advised he did not see who shot the victim but claimed that after shots were fired he observed the white male with a firearm. It should also be noted that according to Reese’s mother, ██████████ and Reese are close friends.

On 05-17-2019, at approximately 1811 hrs, Reese was advised of his Miranda Rights and agreed to speak to detectives. Reese denied being in the area of the homicide and specifically denied shooting anyone. Reese further denied knowing anyone by the name of Joseph.

Printed Name Det K. Oldham # 5166 Signature /S/ Det K. Oldham # 5166

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

\_\_\_\_\_  
Judge

**PROBABLE CAUSE STATEMENT FORM**

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