


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

POLICE NO. :	19-038051
PROSECUTOR NO. :	095453072
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ANTHONY BLACKMON)	
1518 Oakley Ave.)	CASE NO. 1916-CR
Kansas City, MO 64127)	DIVISION
DOB: 09/22/1997)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

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 23, 2019, in the County of Jackson, State of Missouri, Joshua L. Jackson was killed by being shot as a result of the attempted perpetration of the class A felony of robbery in the first degree under Sections 562.012 and 570.023, RSMo, committed by the defendant on or about May 23, 2019, in the County of Jackson, State of Missouri.

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.

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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 23, 2019, 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.

Count III. Attempted Robbery - 1st Degree (570.023-001Y20171208.1)

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 Sections 562.012, 570.023, and 558.011, RSMo, in that on or about May 23, 2019, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, pointed what appeared to be a firearm at [REDACTED] and demanded his property, and such conduct was a substantial step toward the commission of the offense of robbery in the first degree of [REDACTED], and was done for the purpose of committing such robbery in the first degree.

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 IV. 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 23, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of attempted 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 attempted 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 V. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y19841304.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about May 23, 2019, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, knowingly caused serious physical injury to [REDACTED] [REDACTED] by shooting [REDACTED] [REDACTED].

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. The range of punishment for a class A

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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 VI. 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 23, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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 VII. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y20175006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100 RSMo, committed the **class D felony of tampering with physical evidence**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 23, 2019, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, concealed a handgun with the purpose to impair its availability in the Kansas City, Missouri Police Department investigation of the homicide of Joshua Jackson on May 23, 2019, an official investigation, and thereby impaired and obstructed the prosecution of Anthony Blackmon and Dae'Shafaun Jackson-Bey for the crime of murder in the second degree, a felony.

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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.

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/ Jordan Leigh Logan
Jordan Leigh Logan (#63975)
Assistant Prosecuting Attorney
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WITNESSES:

1. PO James L Coleman,
2. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. Joshua L. Jackson, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
6. [REDACTED] 11, Kansas City, MO 64106
7. [REDACTED] City, MO 64106
8. [REDACTED] City, MO 64106
9. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
10. [REDACTED] City, MO 64106
11. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106

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12. PO Jerry R. Richardson, 1125 Locust, Kansas City, MO 64106
13. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 05/31/2019

CRN: KC19038051

I, Detective Hobart Price #5254
(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 05/23/2019, at 1518 Oakley Ave in
(Date) (Address)

Kansas City, Jackson Missouri Anthony Blackmon
(County) (Name of Offender(s))

black, male 09/22/1997 committed one or more criminal offense(s).
(Description of Identity)

- Murder
- ACA
- Tampering
- Attempt Robbery

The facts supporting this belief are as follows:

On 5-23-2019 at 1123 hours, Officers of the Kansas City Missouri Police Department were dispatched to 5501 E. Truman Rd and 1518 Oakley on reported shootings. Located deceased inside of 1518 Oakley was a black male identified as Joshua Jackson, B/M, 1/29/1989. Jackson suffered from gunshot wounds and was declared deceased at the scene.

Upon arrival at 5501 E. Truman Rd, Officers observed a black Toyota Camry, with heavily tinted windows, parked in the first parking spot closest to the front door of Dollar General. In the driver's seat of the Toyota Camry Officers contacted [REDACTED] who appeared to have been shot. Officers observed a black semiautomatic handgun lying on the front passenger floor with the slide on the weapon locked to the rear.

[REDACTED] was transported to an area hospital with gunshot wounds to his abdomen, hip, and wrist which required surgeries prior to his being released from immediate medical care. During an interview of [REDACTED] at Truman Medical Center he stated he met a female online. [REDACTED] he agreed to pay her 50 dollars for sex. [REDACTED] viewed a photo lineup and positively identified the female as Daeshafaun Jackson. [REDACTED] responded to Daeshafaun's house and was texting her at the phone number she provided online of 816-307-[REDACTED]. [REDACTED] stated he saw her on the front porch and he stood outside talking with her for 5-7 minutes on the porch because he was worried about going into the house. She asked him if he had the money. [REDACTED] stated he wanted to exchange money inside. [REDACTED] stated he gave her 50 dollars. [REDACTED] said he heard movement inside the house and Daeshafaun told him it was her dog. They walked inside and she locked the door behind him [REDACTED] stated when he walked inside, one bedroom door was open and one was closed. [REDACTED] was standing in the living room and she went into the kitchen. [REDACTED] stated he didn't feel right and stated he was ready to leave when he saw a door open and saw a guy with a gun in his hand. A skinny guy with a gun came out of one bedroom and a heavy guy with a gun came out of a second bedroom. One of the guys said to [REDACTED], "Give us everything" [REDACTED] stated the guy close to the front door was skinny. The guy in the opposite bedroom was heavy. The skinny guy blocked the front door so [REDACTED] couldn't leave. [REDACTED] stated he has his CCW permit. [REDACTED] stated they started shooting at him and he pulled out his gun and started shooting at both the skinny guy and the heavy guy. [REDACTED] stated the skinny guy was right next to him and the heavy guy was across the room from him. [REDACTED]

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stated they did not expect him to have a gun. ██████ stated he opened the door and saw he was bleeding ██████ took his phone out of his pocket and called 911 and then went back to his car. ██████ stated he started praying and drove to the Dollar General. ██████ stated the Police arrived and he tried to show the Police the address of where everything just happened on his phone but they told him to get on the ground. ██████ advised the .45 caliber handgun located in the floor of his Toyota Camry was the gun he shot inside 1518 Oakley Ave.

██████ allowed detectives to search his phone. Detectives located a text conversation between ██████ and phone number 816-307-8█████. In the conversation ██████ makes an arrangement to respond to 1515 Oakley Ave and pay 50 dollars for sex. On 05/23/2019 at 1108 hours he receives the following message from 816-307-8█████ - "My house is white" Officers were dispatched on the shooting on 05/23/2019 at 1123 hours.

When Officers arrived at 1518 Oakley Ave they contacted a male and female who identified themselves as Daeshafaun Jackson and Anthony Williams. Anthony was later identified as Anthony Blackmon. Anthony stated he lives at 1518 Oakley with his girlfriend Daeshafaun Jackson along with Daeshafaun's mother Jessica Boyd-Bey and the deceased victim Joshua Jackson who is Daeshafaun's stepfather. Anthony stated they had been in north Kansas City at Uncle Dennis's house. They returned to 1518 Oakley Ave so Jessica could go to work. As soon as Jessica went to work Joshua, Daeshafaun and Anthony were in the living room. Daeshafaun went into the kitchen and Joshua got a cigarette. Joshua went outside on the porch to smoke a cigarette and Daeshafaun and Anthony went into the bedroom. While Anthony was in the front bedroom he had a conversation with Joshua through the bedroom window. Anthony asked Joshua if he could smoke his cigarette when he was done. Anthony stated approximately a minute after he asked for the cigarette from Joshua he heard approximately 4-5 gunshots. Anthony stated nobody else was outside with Joshua. Anthony stated he was in the bedroom with Daeshafaun when the shooting occurred. Anthony stated the bedroom door was closed when the shooting occurred. Anthony stated they have a Victoria's secret cover over the window so he could not see outside until he pulled back the cover. Anthony stated when he looked out the window he saw a black car leaving northbound. Anthony described the car as being all black with tinted windows and black rims with red accents on the rims. Anthony stated it appeared the vehicle had just pulled away. Anthony stated he could not think of anyone who would want to harm Joshua.

Daeshafaun stated she, her mother Jessica Bey and the victim, Joshua Jackson, live in the residence (1518 Oakley Avenue). Daeshafaun stated Jessica left for work around 1110 hours. She and Anthony were in her room which is in the front of the residence. She stated she simultaneously heard the front door push open and some gunshots ring out. She stated Anthony got up first and she followed. She stated she observed a black vehicle, which she believed to be a Toyota Camry drive off northbound on Oakley. She stated she exited the room and didn't see Joshua immediately. Daeshafaun stated she looked in his room and saw him lying on the bed.

A search warrant was obtained for 1518 Oakley. On the porch a single brass shell casings head stamped S&B 45 Auto was located. Inside the residence .45 caliber spent shell casings and 9mm spent shell casings were located. Numerous impacts were observed inside 1518 Oakley indicating the shooting had occurred inside 1518 Oakley Ave. The firearms evidence was submitted to the Kansas City Missouri Crime Lab. The results of the test verified all .45 caliber shell casings were fired in the Ruger firearm found in ██████ vehicle. The 9mm shell casings were all fired in the same firearm however the 9mm firearm had not been located. Daeshafaun and Anthony advised they were the only people inside 1518 Oakley Ave at the time of the shooting and did not remove evidence from the scene.

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At the time the scene was processed and the victim Joshua Jackson was moved, there was no firearm located in the residence. During the course of the investigation a witness reported receiving a firearm from Blackmon which Blackmon claims was the firearm used during the homicide.

On 06/03/2019 Officers conducted a car check while searching for Anthony Blackmon and Daeshafaun Jackson. Several occupants were in the car including Anthony Blackmon and Daeshafaun Jackson. One of the occupants in the vehicle was seen on Police Coban video handing Daeshafaun Jackson a bag. Inside the bag Officers located a 9mm handgun. Daeshafaun and Anthony were both taken to the South Patrol Detention Unit for booking. Detectives contacted Anthony Blackmon and read him the Miranda Warning and Waiver. Anthony advised he did not want to speak with Police.

Printed Name Hobart Price Signature /S/ Hobart Price #5254

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

Judge

Circuit Court of _____ County, State of Missouri.