

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

<b>POLICE NO. :</b>	KC19090470
<b>PROSECUTOR NO. :</b>	095456349
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JONATHAN D CAMPBELL</b>	)	
<b>3110 Agnes Ave.</b>	)	<b>CASE NO. 1916-CR</b>
<b>Kansas City, MO 64128</b>	)	<b>DIVISION</b>
<b>DOB: 02/25/1991</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y19840903.0)**

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 November 26, 2019, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Evelyn M. Frazier by shooting her.

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 (571.015-001Y19755213.0)**

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 November 26, 2019, in the County of Jackson, State

## **State vs. Jonathan D Campbell**

of Missouri, the defendant committed the felony of murder in the second degree charged in Count One, 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. 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 November 26, 2019, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] by shooting [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 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 (571.015-001Y19755213.0)**

## State vs. Jonathan D Campbell

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 November 26, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count Three, 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 V. Burglary 1st Degree (569.160-001Y20172202.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the **class B felony of burglary in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 26, 2019, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in an inhabitable structure, located at 3033 Cypress Ave., Kansas City, Missouri, and owned by [REDACTED]. [REDACTED], for the purpose of committing robbery therein, and while in such an inhabitable structure the defendant was armed with a deadly 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.

### **Count VI. Robbery - 1st Degree (570.023-001Y20171207.0)**

## **State vs. Jonathan D Campbell**

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 November 26, 2019, in the County of Jackson, State of Missouri, the defendant forcibly stole two cell phones and a necklace in the possession of [REDACTED], 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 VII. 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 November 26, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count Six, 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.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

**State vs. Jonathan D Campbell**

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/ Jeannette L. Wolpink*  
Jeannette L. Wolpink, #54970  
ASSISTANT PROSECUTING ATTORNEY  
415 East 12<sup>th</sup> Street, Floor 7M  
Kansas City, MO 64106  
Phone: (816) 881-1776  
Email: jwolpink@jacksongov.org

**WITNESSES:**

1. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
2. DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127
3. E [REDACTED]  
[REDACTED]  
[REDACTED], MO  
64106
5. PO Andrew B. Gordon, 1125 Locust, Kansas City, MO 64106
6. [REDACTED], MO  
64106
7. DET Robert D. Guffey, 1125 Locust, Kansas City, MO 64106
8. DET Rodney E. Haney, 1125 Locust, Kansas City, MO 64106
9. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
10. C. Stewart,
11. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 12-04-2019

CRN: KC19-090470

I, Detective Jeremy D. Wells #5015 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 11-26-2019, at 3033 Cypress Ave in  
(Date) (Address)

Kansas City, Jackson Missouri Jonathan D. Campbell  
(County) (Name of Offender(s))

B/M, 02-25-1991 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 11-26-2019 at approximately 1912 Hours, uniformed Officers of the Kansas City, Missouri Police Department were dispatched to 3033 Cypress Avenue, Kansas City, Jackson County, MO 64128 in regard to a shooting. Upon arrival officers discovered one male victim suffering from apparent gunshot trauma to his face. Prior to the victim being transported by medical personnel for his injuries he stated "mom was dead". The responding officers asked who did this and he replied "Johnny did it" The male victim was subsequently transported to an area hospital for his injuries. Responding officers then conducted a protective sweep of the residence and check for further victims. Officers located a female inside the residence on the living room couch suffering from apparent gunshot trauma. KCFD EMS responded and declared the female victim deceased at the scene. The Jackson County Medical Examiner's Office ruled the female victim's death a homicide.

A search warrant was applied for and granted to process the crime scene. Detectives located several spent 9mm shell casings and live rounds all bearing the same head stamp of "Hornady 9MM Luger". Several DNA swabs and fingerprint cards were collected from the scene to assist in developing physical evidence leads for this investigation. There was apparent splintering damage to the front wooden door and door frame into the residence.

A female witness advised prior to the male victim arriving at the residence the suspect knocked on the door asking for the male victim. The witness stated she had never seen the suspect prior to this meeting and the suspect left the front porch after being told the male victim was not home. The witness further stated she had a female friend at the residence at the time the suspect initially arrived. The suspect attempted to talk to her friend and assisted her friend with a tire for her vehicle.

The witness advised the male victim arrived at the residence approximately 20 minutes after the suspect had initially been there asking for him. The witness stated she was in the kitchen when the suspect entered the residence. She heard one gunshot and then heard the suspect asking "where is the shit". She advised she then heard two more gunshots causing her to run from her location in the kitchen into the basement to hide. She

## PROBABLE CAUSE STATEMENT FORM

CRN KC19-090470

stated she was unsure how long she was in the basement prior to climbing out of a basement window and running on foot to call 911.

Detectives made contact with the living victim on 12-01-2019 to complete an audio interview after being advised he was able to talk and had been extubated. The male victim could not originally give a statement due to his medical condition when detectives responded to the hospital on the morning of 11-27-2019. The male victim provided a statement in regard to this investigation. He stated he arrived at the residence where his girlfriend (witness) and her mother (deceased female victim) reside. He stated he entered the residence and locked the door behind him. He stated the deceased female victim was seated on the couch and the female witness was walking toward the kitchen when the suspect forced his way into the front door and shot him in the face. He stated he fell to the ground in the dining room and "played dead" so the suspect wouldn't shoot him again and kill him. He advised he heard the suspect asking "where is the shit" and heard the deceased female advise the suspect "there is nothing in the house". He stated he heard two more shots and the suspect walked toward where he was and took his phones and ripped his necklace off that he was wearing. He advised the suspect ransacked the residence and described the handgun the suspect was using "kept jamming". He stated the suspect left the residence. Shortly after the male victim exited the residence and observed the suspect drive from the scene in a black or dark SUV south on Cypress Ave turning right to travel west on 31<sup>st</sup> Street. The male victim stated he had located a Facebook Page for the suspect while at the hospital. The victim identified the suspect as "**Jonathan Campbell**" from this Facebook page which was provided to detectives after several family members received friend requests from "**Jonathan Campbell**". The male victim also advised he knows **Jonathan Campbell** because he had served jail time with him, while incarcerated in Cameron and that he had further contact with **Campbell** after being released from jail via Facebook messenger. Based on the information provided by the living victim, detectives conducted a computer search and were able to identify the individual on the Facebook Page as **Jonathan Campbell B/M, 02-25-1991**. Detectives in an unrelated investigation had associated **Campbell** to a black Ford Escape registered to his girlfriend which is consistent with the victim's description of the suspect vehicle. Detectives were provided a presumptive NIBIN hit in regard to the shell casings collected from the homicide scene and a shell casing collected from a robbery scene on 11-25-2019 as being from the same firearm.

Detectives compiled a six person line up consisting of six black males all similar in appearance and showed it to the living victim who positively identified (without hesitation) the subject in the #5 (**Campbell**) position as the suspect who had shot him and killed the female victim inside the residence. A witness inside the residence at the time of the shooting was shown a six person line up consisting of six black males all similar in appearance and picked out the subject in the #5 position (**Campbell**) stating "I'm 80% positive it's him" referring to the male who showed up approximately 20 minutes prior asking for the male victim. Based on this information a pick-up was issued for **Campbell** to be arrested and placed on an investigative hold in regard to this investigation.

**Campbell** was located and taken into custody for the homicide pick-up and an unrelated warrant. **Campbell** was subsequently transported to police headquarters where he was interviewed by detectives. **Campbell** was read his Miranda Warnings aloud and stated he understood his rights. Upon questioning **Campbell** advised he was not in the aforementioned residence on the day of the homicide and had no idea why anyone would put his name in this investigation. **Campbell** advised he was not in the area of the homicide on the date in question.

PROBABLE CAUSE STATEMENT FORM

CRN KC19-090470

**Campbell** stated he only communicates with the living victim via Facebook Messenger. **Campbell** confirmed his girlfriend does own a black Ford Escape; however claimed he never drives it unless she is with him. **Campbell** additionally told detectives he sells “weed” on the side and had attempted to get away from officers when he was taken into custody due to the fact he believed he had sold to an “undercover”. Later in the interview **Campbell** advised he had in fact been at the residence in the last week to visit the male victim; however still attempted to distance himself from any knowledge of this investigation, further he stated he had heard the male victim was dead and it was a robbery. A search warrant was applied for and granted to collect a sample of **Campbell’s** DNA for comparison to all samples collected from the aforementioned crime scene. **Campbell** was transported to SCPD for completion of his booking. He was arrested with a cellular device which is in police custody. A search warrant will be applied for in an attempt to get any information in regard to communications between **Campbell** and the living victim.

Given the facts of this investigation detectives are requesting **Campbell** be held and charged for the violent and armed actions against the deceased female victim committed at 3033 Cypress Ave Kansas City, Jackson County, MO 64128. As well the facts as described by the living male and witness show **Campbell** to have committed the crime of burglary and robbery as well as aggravated assault against the male victim while at the residence.

Printed Name Det. Jeremy D. Wells Signature /s/ Det. Jeremy D. Wells #5015

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

\_\_\_\_\_



**PROBABLE CAUSE STATEMENT FORM**

CRN KC19-090470

Judge

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