

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

POLICE NO. :	KC21052235
PROSECUTOR NO. :	095465773
OCN:	HU004865

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
CHARLES N GREER-JOHNSON	)	
1311 East 89th Street, #A	)	CASE NO. 2116-CR
Kansas City, MO 64131	)	DIVISION
DOB: 08/27/1998	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 August 8, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Fred D Brewster Jr. caused the death of Fred D Brewster Jr. by shooting him, and defendant is further given notice that should the state submit murder in the second degree – felony murder under Section 565.021.1(2), it will be based on the death of Fred D Brewster Jr. as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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 (571.015-001Y20205213.0)

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 August 8, 2021, 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

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 A felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about August 8, 2021, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at another person, Fred. D. Brewster Jr., and as a result of the above described conduct, Fred D. Brewster Jr. suffered injury or death.

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 (571.015-001Y20205213.0)

State vs. Charles N Greer-Johnson

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 August 8, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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.

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/ Lauren Whiston
Lauren Whiston (#66185)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Fl
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State vs. Charles N Greer-Johnson

WITNESSES:

1. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Judith M. Harris, 1125 Locust, Kansas City, MO 64106
4. DET Ian D. Hobbs, 1200 E. Linwood, Kansas City, MO 64106
5. DET Kari E. Mutschler, 1125 Locust, Kansas City, MO 64106
6. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
7. DET Christopher S Smith, 1125 Locust, Kansas City, MO 64106
8. DET Alexis M. Vega, 1125 Locust, Kansas City, MO 64106
9. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08/09/2021

CRN: KC21052235

I, Detective J. Harris, #5824, of the 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 08/08/2021, at 550 East 105th Street, #303 in
(Date) (Address)

Kansas City, Jackson County Missouri Greer-Johnson, Charles
(County) (Name of Offender(s))

B/M 08/27/1998 5'08" 220 lbs committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08-08-2021 at approximately 1244 hours, Officers of the Kansas City, Missouri Police Department were dispatched to **550 E. 105th Street, Kansas City, Jackson County, Missouri 64131, Room number 303** on a reported shooting. Upon arrival, officers discovered a deceased male inside the room with apparent gunshot trauma. Also discovered inside the room, was **Charles Greer-Johnson B/M 08-27-1998. Greer-Johnson** made a spontaneous utterance to officers indicating he shot the victim in self defense and was subsequently taken into custody without incident. A search incident to arrest of **Greer-Johnson** revealed four (4) spent shell casings in his pocket. Officers observed two firearms inside room 303 in plain view. KCFD-EMS responded to the scene and declared the victim deceased. This case is being investigated as a homicide.

On 08-08-2021, detectives executed a search warrant on **550 E. 105th Street, Kansas City, Jackson County, Missouri 64131, Room number 303**. Inside the room, detectives located two firearms on a table located on the north side of the room, against the wall. The first firearm (black Taurus 9MM described by the suspect) was in plain view and was determined to have one live 9MM round in the chamber and nine live 9MM rounds in the 17 capacity magazine seated in the firearm. The second firearm (Taurus silver over black 9MM) was located partially covered by a bag of white bed linens and loose linens. This firearm was observed to have no live round in the chamber, with four live 9MM rounds in a seven capacity magazine, seated in the firearm. Several of the linens had apparent blood on them and the bed associated to the room was void of any sheets or pillows.

The victim was lying supine on the floor near the foot of the bed and a set of drawers along the north wall of the room with a television and a gaming console. His head was facing west and his feet to the east toward the door leading into the room. Two apparent defects were observed in the victim's upper chest area when his sweatshirt was moved by CST and JACO Medical Examiner Investigators while wearing latex gloves. The victim was rolled back to front, where a third defect was observed in his upper back consistent with one defect to his front chest area. A corresponding defect was located on the floor in the carpet beneath the victim. A possible foreign object was observed beneath the victim's skin in his mid-back area. The scene was processed by KCPD Crime Scene Technicians. Family was contacted and confirmed the victim was right handed after the victim was located with an apparent VAPE Pen in his right hand while the scene was processed. Two apparent bullet defects were observed in the corner of the north western wall of the room closest to the closet. One appeared to go through the television and into the wall, and the other appeared to have struck the kitchen area counter top, skimmed the drawers the television was on, and came to rest within the wall. One spent bullet was located in the wall and a second spent bullet was observed and recovered from the floor beneath the carpet where the victim had been located. No

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other apparent defects or bullet damage was observed within the room near the victim nor anywhere near the door leading into the room **Greer-Johnson** had entered through. No spent shell casings were located at the scene, only the ones located during the search of **Greer-Johnson** at his time of arrest. A detachable firearm flashlight was located in the nightstand drawer on the west side of the bed against the south wall.

On 08-08-2021, detectives contacted Witness #1 who identified herself as the former romantic partner of **Greer-Johnson**. She also stated she has been in an intimate relationship with the victim and had invited him to the hotel with her to stay for a few days. Witness #2 (juvenile) , dropped off Witness #1's children at the hotel on 08-08-2021. Approximately 30 minutes after the children were dropped off, Witness #2 returned to the hotel and knocked on the room door. When she started to open the door she observed **Greer-Johnson** outside the room and attempted to close the door again based on previous domestic violence history (one report was located in our report writing system from 2018). **Greer-Johnson** pushed the door and forced his way into the room. When Witness #1 looked back into the room, she observed the victim on the other side of the room and advised he was pointing a handgun with a "laser" toward **Greer-Johnson**, who was standing in the doorway associated to the east side of the room. Witness #1 heard an exchange of gunfire and only realized **Greer-Johnson** was armed after the shooting had stopped. After the gun fire had stopped, she realized the victim had been shot. She advised she and **Greer-Johnson** attempted to perform CPR on the victim until police arrived. She stated she did not touch or manipulate anything inside the room prior to police and KCFD-EMS arrival.

On 08-08-2021, detectives contacted Witness #2 who identified herself as **Greer-Johnson's** younger sibling. Witness #2 stated on 08-08-2021 she went with **Greer-Johnson** to drop his children off at the hotel with Witness #1. After dropping the children off, **Greer-Johnson** asked if Witness #1 was at the hotel. She replied "no" and when asked, she stated the victim was at the hotel. A short time later, **Greer-Johnson** and Witness #2 returned to the hotel to get the children, because **Greer-Johnson** does not like the victim. When they returned to the hotel, Witness #2 tried to get **Greer-Johnson** to wait in the car because she knew **Greer-Johnson** had a gun and he can't control his anger. **Greer-Johnson** told her he wasn't going to do anything, he just wanted to see if the victim was there and went up to the room with her. Witness #2 told **Greer-Johnson** to stay two doors back because she didn't want him to try and do anything, and she knows he had a gun. When they got to the room, Witness #1 partially opened the door and observed **Greer-Johnson**. **Greer-Johnson** started trying to get in the room, so Witness #1 tried to shut the door. **Greer-Johnson** was able to get his arm in the door and shot at the victim three times. He then went inside and shot the victim one more time while a toddler (B.B. B/F, 04-02-2020) was standing right next to the victim. Witness #2 then went to the lobby to get assistance.

08-08-2021, **Greer-Johnson** was transported to police headquarters. **Greer-Johnson** was advised of his rights as detectives read them to him aloud and he agreed to provide a statement. **Greer-Johnson** stated he and Witness #2 had dropped his children at the hotel room with Witness #1. Shortly after leaving the hotel, he received a call from a family member indicating the children were unsupervised at the hotel and he needed to go pick them up. Witness #2 and **Greer-Johnson** returned to the hotel in a blue Nissan Altima and parked in the east lot associated to the hotel. When they reached the room and Witness #1 opened the door, **Greer-Johnson** observed the victim pull a handgun from his right front pocket and point the handgun at him from inside the room. **Greer-Johnson** produced his own handgun and fired several shots at the victim striking him an unknown number of times. After he shot the victim, he observed Witness #1 remove the victim's handgun from the victim's hand and place it on the table. He stated he and Witness #1 then attempted to render first aid until the police arrived. He stated he had left his Taurus 9MM handgun in the hotel room and advised he had shot back at the victim in self-defense.

Printed Name Detective J. Harris Signature /s/Detective J. Harris, #5824

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

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Judge

Circuit Court of _____ County, State of Missouri.