

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

POLICE NO. :	KC22012167
PROSECUTOR NO. :	095468630
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
TERRANCE J ROBINSON)	
8407 East 91st Ter)	CASE NO. 2216-CR
Kansas City, MO 64118)	DIVISION
DOB: 02/05/2003)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted
Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y20200999.0)**

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 February 22, 2022, in the County of Jackson, State of Missouri, Davonte Robinson was killed by being shot as a result of the perpetration of the class A felony of Unlawful Use of a Weapon: subsection 9 under Section 571.030, RSMo committed by the defendant on or about February 22, 2022, 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 (571.015-001Y20205213.0)

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 February 22, 2022, 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 firearm.

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 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.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205299.0)

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 February 22, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a habitable structure, a house located at 6304 E 101st St, and as a result of the above described conduct, Davonte Robinson suffered injury or death.

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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 (571.015-001Y20205299.0)

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 22, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count II, 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 firearm.

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 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.

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.

State vs. Terrance J Robinson

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

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

WITNESSES:

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. [REDACTED] Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106
4. [REDACTED] 64106
5. [REDACTED] MO 64106
8. Davonte Robinson, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
9. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
10. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
11. PO Evan A. Tarwater, KCPD, 7601 Prospect, Kansas City, MO 64132
12. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
13. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03-23-2022

CRN: 22-012167

I, Detective Bonita Cannon, #4585, 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 02-22-2022, at 6304 E. 101st Street in
(Date) (Address)

Kansas City, Jackson Missouri Terrance J. Robinson
(County) (Name of Offender(s))

DOB 02-05-2003 / [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 02-22-2022 at 1704 hours, Kansas City Police were dispatched to 101st St and Fremont Ave, Kansas City, Jackson County Missouri in regard to an armed event, party armed with a weapon. The Officers were updated that a shooting occurred at 6304 E. 101st Street, Kansas City, Missouri.

Upon their arrival, the victim was located on the kitchen floor of the address. He was suffering from an apparent head injury. He was transported to Research Medical Center with life threatening injuries.

Trauma nurses at Research Medical Center informed detectives there was nothing that could be done for the victim. A few days later after the victim was transferred to Truman Medical Center, his assigned Trauma Nurse, informed the reporting detective, the victim was non-responsive and his head injury was non-survivable. He is currently on life support at the request of his mother and if removed he would not survive on his own. As of 03-18-2022 the victim's condition has not changed per his assigned nurse and he continues to need artificial assistance to breath. Pursuant to RSMo 194.005 the victim is considered deceased.

While processing the scene at 6304 E. 101st Street a rifle shell casing stamped LC21 was recovered from along the curb near the address.

Detectives recovered video from a Ring doorbell camera at a nearby residence. Upon viewing the video footage, it showed a maroon Nissan Altima at 6304 E. 101st Street at the time of the shooting along with a brown colored Subaru Outback. Also observed was what appeared to be a

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subject in a blue hooded jacket and pants walking back towards the Subaru Outback, as the female parties get into the maroon Nissan Altima.

Officers located the maroon Nissan Altima near the scene and attempted to pull it over. The driver of the Nissan [REDACTED] was taken into custody after colliding with a motorist in the area of Swope and Prospect, while attempting to elude the pursuing officers. [REDACTED] was advised of her Miranda Rights. She initially declined to speak with detectives but she later contacted detectives and provided a statement.

[REDACTED] stated she was contacted by juveniles [REDACTED] via messenger. They wanted a ride to fight juveniles [REDACTED] stated she agreed to pick them up and take them to 6304 E. 101st Street to fight. Upon their arrival juvenile [REDACTED] told them to wait in the vehicle until her brother arrived. [REDACTED] stated a "tan goldish brown" SUV, later determined to be a Subaru Outback, arrived and a male she positively identified as Terrance Robinson (B/M 02-05-2003) wearing a blue hooded jumpsuit exited the SUV. She stated she and Terrence Robinson had attended school together. She further stated the vehicle he was a passenger in, was driven by an unknown white female.

[REDACTED] stated juveniles [REDACTED] went into the yard of 6304 E. 101st Street, she and juvenile [REDACTED] remained on the street. [REDACTED] stated when the adult female at the address pointed a firearm at juvenile [REDACTED] told them it was time to leave. She stated the female juveniles got into her vehicle and they left northbound. She further stated they left ahead of Robinson and the SUV. [REDACTED] stated when they (her and the female juveniles) got to Bannister and Hillcrest; the SUV sped past her, turning eastbound onto Bannister Road. [REDACTED] stated she did not see anyone with a firearm, nor did she hear any sounds of shots. When shown a screenshot from the Ring doorbell video surveillance [REDACTED] identified all of the subjects pictured and the vehicles. She further stated juvenile [REDACTED] only has one brother.

[REDACTED] was contacted and stated the following: She and her c [REDACTED] were arguing back and forth with [REDACTED] At some point those three went up to Ruskin High School to fight [REDACTED], [REDACTED] had already left the school. [REDACTED] stated the same three females arrived with an unknown male to her [REDACTED] address on 02/22/22. [REDACTED] stated she and juvenile [REDACTED] exchanged calls with the [REDACTED], [REDACTED]. The calls were exchanged while the female juveniles were headed to her house and while they were there at her house. The female juveniles had been to her house and left a couple times that day and the final time they returned with [REDACTED] stated she was going to fight with the females and her cousin.

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██████████ stated she also observed the only male with the females, dressed in blue, pointing a long gun at their residence. ██████████ stated at some point her ██████████ pulled her away from the living room window. She then heard sounds of shots; then saw her brother lying on the steps covering the younger kids. ██████████ had videos of the females in her yard.

██████████ She further stated after her aunt waved a gun at the females in her yard, the girls left. The only male with the females was wearing blue; he got into a different vehicle that she believed to be a burgundy SUV. Juvenile ██████████ stated the male in blue fired shots into their residence from the passenger side of the SUV as the vehicle passed their residence. Juvenile ██████████ stated prior to the juvenile females arriving, she received calls from juvenile ██████████ about what her “brother” later identified as Robinson was going to do. She stated the only male present was standing a couple houses down and on the opposite side of the street.

██████████ was contacted and stated the following: She was with juveniles ██████████ in the 80's (unknown address). They got a ride from ██████████ to fight juveniles ██████████. She further stated they went to the address on four different occasions to fight. ██████████ stated the first two times juveniles ██████████ didn't come outside. The third time they came outside and stood on their porch. At some point ██████████ mother “pulled a gun.” She stated they ██████████ left with ██████████ stated they returned the fourth time to egg the residence, however the police were there.

██████████ signed a Consent to Search of her cell phone. Upon reviewing her cell phone data, a photograph of the victim's residence (including his mother, and ██████████) was observed along with videos of them at the address. During one of the videos it appears to show a black male, Robinson, standing across the street from the victim's residence. Robinson is wearing a blue hooded jacket and blue pants. The video also pans to the “SUV,” later determined to be a Subaru Outback.

Detectives located LPR readings of the ██████████ was driving and a tan Subaru Outback from the date of the shooting, near the scene just prior to when the shooting was reported. An image of the Subaru was viewed by members of Gang Intelligence. They conducted surveillance of Robinson. On 03-02-2022 Robinson was observed in the Subaru Outback along with ██████████, a white female. Officers attempted to conduct a car check of the Subaru when ██████████ attempted to elude the officers. Both Robinson and ██████████ were eventually taken into custody. Robinson

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was the passenger in the brown 2011 Subaru bearing an expired temporary Missouri license plate of 05V0X4. Both were transported to Police Headquarters, 1125 Locust.

██████████ was advised of her Miranda Rights at 1605 hours. She stated she understood her rights. ██████████ denied being in her vehicle the day of the shooting. She stated her roommate Lotus (a white female who's actual name is ██████████) had her vehicle (Door Dashing) and her cell phone the day of the shooting from approximately 1pm to 8pm. ██████████ stated she was at home and that Robinson was present when she fell asleep and was there when she woke up at approximately 6pm.

██████████ were contacted. Both denied ██████████ ever driving ██████████ vehicle or using ██████████'s cell phone.

Robinson was advised of his Miranda Rights at 1709 hours. During his interview he did not appear to be interested in speaking with detectives. When informed we wanted to talk to him about an incident in south Kansas City last Tuesday, the 22nd (02-22-2022), Robinson seemed to get agitated and at some point uttered he wanted his telephone call.

On 03-03-2022 a search warrant was granted and executed on the 2011 Subaru. During the execution of the search warrant 3 rifle shell casing stamped with LC were recovered from the vehicle (two from under front passenger seat and one from under the trunk liner).

The three rifle shell casings recovered from the Subaru had the same head stamp as the rifle shell casing recovered from the scene.

On 03-08-2022 the reporting detective received notification that the three recovered rifle shell casings from the Subaru and the one rifle shell casing from the scene were all fired from the same firearm.

The reporting detective monitored jail calls of both Robinson, who at times spoke freely about his rifle, and ██████████. Those Robinson spoke to on the jail calls spoke freely and at times used common slang for the rifle. As a result of the jail calls the reporting detective obtained a search warrant for the known location (██████████) of the rifle. Upon executing the search warrant a Del-Ton Inc 5.56mm rifle was recovered from underneath a bed at the residence.

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When asked about the rifle- [REDACTED] stated a “friend of her only brother Terrance brought the rifle to her house and put it in her bedroom.” She went on to state she doesn't know the male, whom she believes name is “Sav” or Save” and she doesn't know why he brought the rifle to her. She stated she believes it was to sell and to help get her brother, Terrance get an attorney.

On 03-23-2022 the reporting detective received a report from the Kansas City Police Crime laboratory that the four spent rifle casings recovered from the scene and the Subaru were fired from rifle recovered on 03-17-2022.

The case Detective is requesting an arrest warrant in lieu of a summons for the listed offender as the circumstances of the crime was violent in nature. “Robinson” has had prior contacts with law enforcement Officers and is currently in custody for a Robbery.

In light of the recent incident and his recent conduct the case Detective believes the offender is a danger to himself and the public.

Printed Name Det. Bonita Cannon, #4585 Signature /s/Det. Bonita Cannon, #4585

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

Judge

Circuit Court of _____ County, State of Missouri.