


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	22-019884
PROSECUTOR NO. :	095468991
OCN:	qo008199

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
AARON L. SIMMONS JR.)	
4109 Jackson Ave)	CASE NO. 2216-CR
Kansas City, MO 64130)	DIVISION
DOB: 03/15/1993)	
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 March 29, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to David J Rowe caused the death of David J Rowe 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 (571.015-001Y20205213.0)

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 March 29, 2022, in the County of Jackson, State of

State vs. Aaron L. Simmons Jr.

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 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/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

1. PO Bryan Conley, 223 N. Memorial Drive, Independence, MO 64050
2. CST Taryn Dowdy, 223 N. Memorial Drive, Independence, MO 64050
3. CST Jason Myers, 223 N. Memorial Drive, Independence, MO 64050
4. DET Steven Schmidli, 223 N. Memorial Drive, Independence, MO 64050
5. PO Mark Showman, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 4/1/2022

Report: #2022-19884

I, Steven D. Schmidli, a Detective with the Independence, Missouri Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 3-29-2022 at 2301 hrs., Aaron L. Simmon Jr. (Race – B, Sex - M, DOB: 3-15-93, [REDACTED] Last Known Address: 4109 Jackson Ave., Kansas City MO 64130) Committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this believe are as follows:

That on 3-29-2022 at 2301 hrs., the Defendant, Aaron L. Simmon Jr. knowingly shot and killed David J. Rowe (dob: 11-27-89) at the Phillips 66 Minit Mart located at 4208 S. Noland Road in Independence, Jackson County Missouri.

On 3-29-2022 at 2301 hrs., Independence MO Police were dispatched to the Phillips 66 Minit Mart located at 4208 S. Noland Road in reference to a shooting. Upon arrival, officers located a lifeless white male subject laying on the pavement on the east side of the closed business. Ambulance personnel arrived on scene and confirmed the male victim was deceased. A crime scene perimeter was established around the business. Officers located a black Madza CX-9 SUV parked near gas pump #3 on the north side of the business along with four spent 9 mm shell casings. Officers contacted the victim's [REDACTED] who identified the shooting victim as David J. Rowe (dob: 11-27-89). [REDACTED] an told officers that an unidentified black male wearing a tan jacket had shot the victim and fled the scene on foot northbound from the business. The witness was secured in a patrol vehicle for detectives. An area check was conducted for the shooting suspect, but results were negative. The IPD Crime Scene Unit responded and processed the crime scene for evidence purposes. The spent shell casings were recovered and a NIBIN examination was conducted on them.

Det. Steve Schmidli responded to the crime scene as part of the investigation. [REDACTED] was escorted to the IPD Investigations Unit for a formal statement on the offense. She advised that she lives with her sister at [REDACTED] Independence MO. She identified the shooting victim as her boyfriend, David J. Rowe of Olathe KS. She advised that she has been dating Mr. Rowe since [REDACTED]. She identified Mr. Rowe's vehicle as a black Madza SUV.

[REDACTED] advised that about 1900 hours this evening, Mr. Rowe drove out to Independence MO and picked her up from her sister's residence. She advised that Mr. Rowe drove them to get some Chinese food for dinner and eventually they rented a motel room at the Days Inn (13712 E. 42nd Terr.) for the night. [REDACTED] stated that they stayed inside their motel room for about one hour and then left to go buy some cigarettes. [REDACTED] stated that Mr. Rowe

drove them in his SUV and pulled into the Phillips 66 Minit Mart (4208 S. Noland) to get the cigarettes but realized it was closed. She stated that they drove around the east side of the building and observed an unknown black male subject standing by the northeast corner of the business. [REDACTED] stated that she observed the black male subject to be “yelling and cussing” at someone on his cell phone. [REDACTED] that Mr. Rowe felt it necessary to offer the unknown black male a “ride” as it was raining.

[REDACTED] stated that he pulled over near the gas pumps on the northeast corner of the business and was immediately approached by the black male subject. She stated that the black male started screaming at them that they had “almost hit him” with their car. The black male subject then physically struck the rear driver’s side of their vehicle with his hand. She stated that Mr. Rowe cracked his driver’s side window and told the black male that he only wanted to offer him a ride. [REDACTED] stated that the black male subject immediately pulled a “black 9mm” handgun and pointed it at them, stating “I’m gonna shoot you motherfucker!”. [REDACTED] stated that Mr. Rowe opened his driver’s side door and exited the vehicle. She advised that she overheard Mr. Rowe challenge the black male subject to “just shoot me!”. [REDACTED] stated that without warning, the black male suspect fired three rounds at Mr. Rowe, striking him. She stated that Mr. Rowe fell to the ground and the black male suspect fled the area on foot northbound towards I-70. [REDACTED] advised that she noticed the suspect’s “eyes” and claimed that she will “never forget his face”. [REDACTED] stated that she could positively identify the black male suspect. [REDACTED] described the suspect as a black male, 30-35 yoa, short, about 5’5 in height, 160 lbs., very short black hair and was observed wearing a “tan hoody”. [REDACTED] denied that the shooting was related to a drug transaction and does not know the suspect.

The Jackson County Medical Examiner’s Office ruled the death of David Rowe as a homicide. The victim was shot four times to his upper body.

On 3-30-2022, IPD Crime Scene Technician Jason Myers responded to the Phillips 66 Minit Mart and recovered surveillance video of the actual shooting. Still photos of the shooting suspect were released to the local media in an effort to generate investigative leads on the offense. Later that same day, an anonymous tipster called the TIPS Hotline and identified the shooting suspect as Aaron Simmon. The tipster claimed that Mr. Simmon was overheard telling two other individuals about the offense. Law enforcement computer checks on Mr. Simmon showed him to have a similar physical description as that of the shooting suspect. A photo array was developed and shown to [REDACTED] whom positively Simmon as the shooting suspect in this offense. A “Person of Interest” Advisory was issued on Aaron L. Simmon Jr. for murder.

On 3-31-2022, the IPD Street Crimes Unit, the IPD SWAT team along with law enforcement personnel from the Kansas City MO Police Department were briefed on the offense and began active surveillance of a residence located at 4109 Jackson Ave. in Kansas City MO that associated to Aaron Simmon Jr. This law enforcement entity followed and eventually took Mr. Simmon into custody without incident after he was seen leaving the residence.

A search warrant was obtained and executed on the residence of 4109 Jackson Ave. in Kansas City MO. The utilities on the address registered to Aaron Simmon Jr. Detectives with the IPD Criminal Investigations Unit searched the residence and located a Glock 9 mm handgun in a bedroom closet. The handgun was recovered as part of the investigation and NIBIN test firing was conducted on the handgun at IPD Headquarters. Shortly thereafter, NIBIN results were received, and it was determined that the handgun located in Mr. Simmon's residence was in fact the same handgun used in the shooting death of David Rowe.

Det. Schmidli attempted to formally interview Mr. Simmon in regard to the offense. After being advised of his rights, Mr. Simmon refused to sign the Warning of Rights form and immediately invoked his rights by refusing to make any statement on the incident.

Det. Steve Schmidli #842

/s/ Steve Schmidli

Print Name

Signature