

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

POLICE NO. :	KC21070174
PROSECUTOR NO. :	095466831
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
CRAIG D. MOSS JR.)	
3035 Harrison St, #203)	CASE NO. 2216-CR
Kansas City, MO 64109)	DIVISION
DOB: 05/08/1991)	
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 October 16, 2021, in the County of Jackson, State of Missouri, the defendant knowingly, or with the purpose of causing serious physical injury to Andre Green, caused the death of Andre Green by shooting him.

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 on or about October 16, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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.

State vs. Craig D. Moss Jr.

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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jamie K. Hunt
Jamie K. Hunt (#50401)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
jhunt@jacksongov.org

State vs. Craig D. Moss Jr.

WITNESSES:

1. [REDACTED]
2. [REDACTED]
3. DET Judith M. Harris, 1125 Locust, Kansas City, MO 64106
4. PO Hennigh, 1125 Locust, Kansas City, MO 64106
5. DET Ian D. Hobbs, 1200 E. Linwood, Kansas City, MO 64106
6. [REDACTED]
64106
7. DET Kari E. Mutschler, 1125 Locust, Kansas City, MO 64106
8. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
9. DET Christopher S Smith,
10. DET Alexis M. Vega, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09/01/2022

CRN: KC21070174

I, Detective Nicole Anderson #5715, Kansas City, Missouri Police Department, Homicide Unit
(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 10/16/2021, at 4519 Chestnut Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Moss, Craig D
(County) (Name of Offender(s))

B/M 05/08/1991 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 10/16/2021 at approximately 1501 hours, Officers of the Kansas City Missouri Police Department were dispatched to 4519 Chestnut Avenue Kansas City, Jackson County, Missouri 64130 on a reported a shooting. Upon arrival, Officers located the victim in the living room on a couch suffering from apparent gunshot trauma (CRN: KC21070174). KCFD medics responded to the scene and declared the male deceased. Spent shell casings were observed in the driveway of the residence.

Witness #1 was contacted at the scene who stated he was inside 4519 Chestnut Avenue with the victim and **Moss, Craig D. B/M 5/8/91**. He stated he was in the back bedroom when he heard arguing and when he looked out to the living room, he observed the victim picking up a television off the floor. He stated he went back into his bedroom and continued playing video games and then heard gunshots. When he came out to the living room, he observed the victim suffering from apparent gun shot trauma on the couch and **MOSS** was gone.

Detectives contacted Witness #2 who stated she got home, opened the front door, and observed the victim who she knows as her mother's boyfriend slumped over the couch. She immediately closed the front door, called her mother, and then called the police.

Detectives contacted Witness #3 who is the father of Witness #2's son. Witness #3 stated he was at home when his son approached him and stated **MOSS** was calling his phone through a Facetime Video Call. Witness #3 answered the video call and observed **MOSS** on the screen. After greeting **MOSS**, **MOSS** became agitated and said that he had "shot Andre in the head" and Witness #3 would "end up like him if you keep playin."

On 10/16/2021 **MOSS** was arrested in the vicinity of his residence. He was transported to police headquarters. **MOSS** was read his rights and agreed to speak with detectives. **MOSS** stated earlier that day he went over to Witness #2's residence. He recounted having to walk further than normal due to a marathon taking place in the vicinity. He recounted interacting with Witness #1, Witness#2 and his mother at the residence. Before detectives could ascertain more information from **MOSS** he invoked his right to an attorney.

On 09/01/22 at approximately 0755 hours officers were dispatched to 3035 Harrison Street, Jackson County, Kansas City, Missouri, on a reported shooting where a male was declared deceased (CRN: KC22059151). Craig Moss was taken into

PROBABLE CAUSE STATEMENT FORM

CRN KC21070174

custody and spent 9mm casings were located on scene. A rush comparison was completed on the spent shell casings from both scenes due to them being the same caliber, 9mm. The crime lab completed the comparison and advised the 9mm Luger cartridge cases (Items 012) recovered under KC21070174 were fired in the same firearm as the 9mm Luger cartridge cases (Item 017) recovered under KC22059151.

Printed Name Detective Nicole Anderson #5715 Signature DET.  5715

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

Judge

Circuit Court of _____ County, State of Missouri.