

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

POLICE NO. : KC24064583

PROSECUTOR NO. : 095480435

OCN: HU024165

STATE OF MISSOURI,

PLAINTIFF,

vs.

LORENZO C. JOHNSON

1608 E Missouri Ave

Kansas City, MO 64106

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2416-CR

DIVISION

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 on or about August 21, 2024, in the County of Jackson, State of Missouri, [REDACTED] was killed by being shot as a result of the perpetration of the of the class A felony of Robbery in the First degree under Section 570.023, RSMo, or as a result of the class B felony of Unlawful Use of a Weapon under Section 571.030(9), RSMo, committed by the defendant on or about August 21, 2024, 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.

Count II. 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 August 21, 2024, 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.

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. Robbery - 1st Degree (570.023-001Y20201205.0)

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 August 21, 2024, in the County of Jackson, State of Missouri, the defendant forcibly stole a red Nissan Versa in the possession of [REDACTED], and in the course thereof the 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. 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 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 on or about August 21, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count 3, 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 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 V. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B 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 21, 2024, at 3319 E LINWOOD BLVD, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at another person, [REDACTED]

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. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

Count VI. 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 on or about August 21, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 5, 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 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 VII. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the class D felony of unlawful possession of a firearm, punishable under Sections 558.011 and 558.002, RSMo, in that on or about August 21, 2024, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Khar .45 caliber handgun, a firearm, and on or about [REDACTED] the defendant [REDACTED]

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count VIII. Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk Of Serious Injury/Death To Any Person (575.150-002Y20204801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about August 21, 2024, in the County of Jackson, State of Missouri, [REDACTED], a law enforcement officer, was attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, resisted the stop of defendant by fleeing from the officer and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant drove at a high rate of speed down residential streets and failed to obey traffic signals.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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. Lorenzo C. Johnson, Case No.

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/ Hallie L. Schuman

Hallie L. Schuman (#66333)

Assistant Prosecuting Attorney

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WITNESSES:

The State's witnesses as of 8/22/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

22-Aug-2024 16:21

CIRCUIT COURT OF JACKSON COUNTY, MO

DCA

PROBABLE CAUSE STATEMENT FORM

Date: 08-22-2024

CRN: KC24064583

I, Det. Ryan Taylor, #5585, KCPD 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 08-21-2022, at 3319 E Linwood Boulevard in
(Date) (Address)Kansas City, Jackson Missouri Lorenzo Johnson
(County) (Name of Offender(s))

[REDACTED] committed one or more criminal offense(s).

(Description of Identity)

The facts supporting this belief are as follows:

On 08-21-2024 at approximately 2046 hours, officers of the Kansas City, Missouri Police Department were dispatched to the BP gas station located 3319 E Linwood Boulevard, Kansas City, Jackson County, Missouri in regard to a shooting call for service. Upon their arrival the victim was located near the pumps at the dispatched address, suffering from a gun shot wound to the head. The victim was transported to a local hospital where he was pronounced deceased. The Jackson County Medical Examiner ruled the death a homicide.

While officers were at the crime scene they began to contact witnesses and review security video from the store. Officer's were able to determine that the suspect had arrived in a gold Lincoln Town Car and stole the victim's red Nissan Versa. Officers put out the suspect's vehicle description via police radio. The suspect in the video was observed to be a black male wearing a black shirt, khaki shorts, a short "afro" style haircut, and a gold chain. An officer, who had been helping the Robbery Unit with a string of armed robberies in the area recognized the vehicle description of the gold Lincoln Town Car as well as the suspect description.

Between 1918 and 1925 hours there were multiple attempted armed robberies and an aggravated assault with the suspect vehicle being a tan Lincoln Town Car. Believing that this was the same car as what they had seen earlier in the day, officers parked in the area of Linwood and Spruce and conducted surveillance on the house.

At approximately 2043 hours, just minutes before the call for service for the homicide at 3319 E Linwood Boulevard was dispatched, officers doing surveillance observed a red sedan traveling east on Linwood and then turn north on Spruce, then it quickly backed into the driveway that they had observed the gold Lincoln Town Car parked earlier in the day. Shortly after the vehicle parked, dispatch advised of the shooting call for service at the BP gas station. When those responding officers arrived they advised that the victim's Nissan Versa had been stolen. Officers on surveillance at 31st and Spruce advised that they most likely observed the victim's vehicle park at the residence at 31st and Spruce.

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After KCPD Homicide responded to the crime scene and processed it for evidence. Surveillance video from the store was reviewed. The video showed the victim arrive in a red Nissan Versa and park at the pump. A gold Lincoln Town Car arrives at the gas station and parks. While the victim was fueling, the suspect exits the gold Town Car. The suspect was observed wearing a black shirt, khaki shorts, a necklace with a large circular medallion and a short "afro" style haircut. The suspect and victim engaged in a physical struggle. The suspect entered the victim's vehicle. The victim attempted to strike the suspect. The victim backed away from the door and walked towards the rear of the vehicle. The suspect is then observed pointing a gun at the victim and shoot him. The victim falls to the ground and the suspect backs the vehicle up over the victim's body and then leaves the parking lot.

At 2255 hours, officers observed the Nissan Versa that was parked in the area of 31st and Spruce exit the driveway and turn north on Spruce. Additional officers drove to the area and were able to quickly get behind the vehicle. The officers were able to observe that there were two occupants in the vehicle, a black male driver and a white female passenger. The Versa also had older style, out of date, Missouri license plates affixed and lacked renewal stickers. Believing this to be the same vehicle as the victim's vehicle, a car check was initiated and the vehicle eluded.

Officers positioned their marked patrol vehicle [REDACTED] behind the Nissan. At approximately 2255 hours officers initiated their emergency red lights and siren in an attempt to stop the Nissan. The Nissan initially pulled over for a brief moment and there were able to observe the driver pull a gun and attempt to point it at officers before quickly fleeing from their marked patrol vehicle with activated emergency equipment. The Nissan traveled north on Spruce Ave from E Linwood Boulevard and began to come to a stop outside of the residence at 31st and Spruce before quickly traveling north again on Spruce Ave. Upon approaching the intersection with E 31st St the Nissan turned west and traveled to Jackson Ave where the Nissan then took a southbound turn onto Jackson Ave. The Nissan traveled at a high rate of speed and attempted to make an eastbound turn onto E Linwood Boulevard from Jackson Ave (while failing to signal). Due to the dangerous driving of the driver the Nissan lost control and spun-out in the intersection of E Linwood Boulevard and Jackson Ave (facing southwest). It was at that time the front right passenger, an unknown white female, exited the vehicle and ran eastbound on the north side of E Linwood Boulevard. Officers observed the driver of the listed Nissan to begin making multiple furtive movements towards his right hip. Officers recognized the movements to be the driver reaching for a firearm. With the knowledge the driver was the suspect in multiple violent felonies as well as the belief the driver was attempting to retrieve a firearm to potentially shoot or/or kill officers to escape apprehension they utilized their marked patrol vehicle to push the Nissan to the south against the curb so the driver could be safely apprehended.

Once the listed Nissan was off the roadway officers conducted a felony car check to safely apprehend the driver, the pursuing officer, [REDACTED] observed what appeared to be the slide of a firearm in the driver's right hand against his lower right-side pectoral. While again attempting to conduct a felony car check, the Nissan was struck again in the driver's side door by his marked patrol vehicle when he exited due to the patrol vehicle not being in fully in park. This collision caused the driver's side curtain airbags in the listed Nissan to deploy, at which time all visual contact with the driver of the Nissan was lost. Officers tactically repositioned and prepared to verbally re-engage the driver, at which time the driver regained control of the vehicle and again began traveling eastbound on the city sidewalk paralleling E Linwood Boulevard before driving off the curb and traveling north on Spruce Ave (failed to signal turn). The Nissan continued north then turned east on E 31st St (failed to stop at posted stop

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sign, failed to signal turn) and traveled into oncoming lanes of traffic. After returning to the correct lanes of travel the Nissan failed to maintain a single lane and continued eastbound on E 31st St to Lister Ave. At the intersection of E 31st St and Lister Ave the Nissan turned north on Lister Ave and began swerving all over the roadway. At the intersection of E Linwood Boulevard and Lister Ave the Nissan completed an eastbound turn onto E Linwood Boulevard (failing to stop at posted stop sign, and failed to signal turn). The Nissan continued eastbound to where E Linwood Boulevard re-connects with E 31st St. The Nissan ran the red light at the intersection of 31st St and E Linwood Boulevard and continued east on E 31st St. While approaching the intersection of E 31st St and Van Brunt Boulevard the Nissan blacked out (turned off all lights). The Nissan then failed to stop at the red light at the intersection of E 31st St and Van Brunt Boulevard before completing a northbound turn onto Van Brunt Boulevard. The Nissan then turned east into the BP Gas station parking lot (3027 Van Brunt Boulevard) circled the building, then cut through the McDonald's parking lot (3051 Van Brunt Boulevard) before driving back onto E 31st St. The Nissan traveled westbound across Stadium DR then lost control again in the intersection of E 31st St and Van Brunt Boulevard, before regaining control and proceeding northbound on Van Brunt Boulevard. As the Nissan approached the I-70 Eastbound on-ramp, the driver again spun the vehicle around and attempted to travel southbound on Van Brunt Boulevard. At that time the driver of the Nissan attempted to drive across the median and high-centered the vehicle on the curb. The driver climbed over the center console and into the front right passenger seat before exiting the front right passenger seat and fleeing on foot. Officers continued to pursue the driver in their marked patrol vehicle so they and other officers had constant cover from the armed party. While the driver was fleeing on foot he was attempting to retrieve and draw a pistol plainly visible on his right side. After a short foot pursuit, the driver was taken into custody at approximately 2302 hours.

Once the suspect was taken into custody, it was observed that he was a black male wearing a black shirt, khaki shorts, a short "afro" style haircut, and a gold chain. He was armed with a Khar .45 caliber handgun with a black in color holster. Additionally, JOHNSON had the vehicle title for the victim's Nissan in his pocket.

The suspect was identified via fingerprints as Lorenzo JOHNSON.

JOHNSON was transported to 1125 Locust Street, Police Headquarters, where his clothing was recovered as evidence. JOHNSON declined to provide a statement.

Printed Name Det. Ryan Taylor, #5585

Signature , #5585

The Court finds probable cause and directs the issuance of a warrant this 22nd day of August, 2024.

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SIGNED BY JUDGE

*This is a redacted public document. The original
unredacted document bears the Judge's signature.*

Judge

Circuit Court of Jackson County, State of Missouri.