

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

POLICE NO. :	KC25000036
PROSECUTOR NO. :	095482427
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
JEROME L DAVIS	)	
██████████	)	CASE NO. 2516-CR
Kansas City, MO 64132	)	DIVISION 25
DOB: ██████████	)	
Race/Sex: B/M	)	
S.S.N.: ██████████	)	
	)	
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 on or about January 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to ██████████, caused the death of ██████████ by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), RSMo., it will be based on the death of ██████████ as a result of the perpetration of the class B felony of unlawful use of a weapon, discharging a firearm at a person, under Section 571.030(9), RSMo., committed by the 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 (571.015-001Y20205299.0)

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 571.015.2, RSMo., in that on or about on or about January 1, 2025, 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 or through, the knowing use, assistance or aid of a deadly weapon, and on or about June 6, 2005, in the Sixteenth Circuit Court of Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 571.015.2, 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.

Count III. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo., committed the **class A felony assault in the first degree**, punishable upon conviction under Section 558.011, RSMo., in that on or about on or about January 1, 2025, in the County of Jackson, State of Missouri, the defendant shot [REDACTED], and such conduct was a substantial step toward the commission of assault in the first degree of [REDACTED] and was done for the purpose of causing such assault, and in the course thereof defendant inflicted serious physical injury on [REDACTED].

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 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 571.015.2, RSMo., in that on or about on or about January 1, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with or through, the knowing use, assistance or aid of a deadly weapon, and on or about June 6, 2005, in the Sixteenth Circuit Court of Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 571.015.2, 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.

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 January 1, 2025, at [REDACTED], in the County of Jackson, State of Missouri, the defendant, knowingly shot 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 (571.015-001Y20205213.0)

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 571.015.2, RSMo., in that on or about on or about January 1, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon by, with or through, the knowing use, assistance or aid of a deadly weapon, and on or about June 6, 2005, in the Sixteenth Circuit Court of Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 571.015.2, 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.

Count VII. 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 January 1, 2025, at [REDACTED], in the County of Jackson, State of Missouri, the defendant, knowingly shot 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 VIII. 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 571.015.2, RSMo., in that on or about on or about January 1, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon, with or through, the knowing use, assistance or aid of a deadly weapon, and on or about June 6, 2005, in the Sixteenth Circuit Court of Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 571.015.2, 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.

Count IX. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo., committed the **class D felony of tampering in the first degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo., in that on or about January 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a white 2007 Chevrolet Impala, an automobile.

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 X. Unlawful Possession Of A Firearm - Dangerous Felon/Prior Conviction (571.070-003Y20245212.0)

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 B felony of unlawful possession of a firearm**, punishable under Section 558.011, RSMo., in that on or about January 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 9mm handgun, a firearm, and on June 6, 2005, the defendant was convicted of the felony of armed criminal action, a dangerous felony as defined in Section 556.061, RSMo., in the Sixteenth Circuit Court of Jackson County, Missouri.

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.

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.

MELESA N. JOHNSON
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Claire E Wyatt
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WITNESSES:

The State's witnesses as of 1/15/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

