

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

Police# 16-062725
Prosecutor# 095435254
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Terrance L. Blanks
4507 Tracy
Kansas City, MO 64130
DOB: 03/13/1986; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

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 August 24, 2016, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Rockey Bradley caused the death of Rockey Bradley 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 (571.015-001Y19755213.0)

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 24, 2016, 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, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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,

Bryan O. Covinsky (#47132)
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WITNESSES:

Rockey L Bradley , Prosecuting Atty. Office, Kansas City, MO 64106

DET Bonita Y. Cannon , 1125 Locust, Kansas City, MO 64106

DET Heather Leslie , 1125 Locust Street, Kansas City, MO 64106

DET Joe A. Nelson , 1125 Locust, Kansas City, MO 64106


DET Nicholas A. Sola , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09-12-2016

CRN: 16-62725

I, Detective Heather Leslie #5194, Kansas City MO 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 08-24-2016, at 2711 Indiana Ave in
(Date) (Address)

Kansas City, Jackson Missouri Terrence L. Blanks
(County) (Name of Offender(s))

B/M 03-13-1986 SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08/24/2016 at approximately 1028 hours, officers of the Kansas City Missouri Police Department were dispatched to 2711 Indiana Ave, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, officers observed an unknown victim deceased from apparent gunshot wounds. Information was provided to police indicating the suspect was a B/M with dreads, having a beard wearing a grey hoodie. The suspect was seen fleeing the scene in a Black in color Chevrolet Tahoe.

On 08/24/2016 at approximately 1034 hours, Officers of the Kansas City Missouri Police Department were dispatched to 45th St and Tracy Ave on a reported shooting thought to be connected to the shooting that occurred at 2711 Indiana. The calling party would only provide a B/M had been shot in the arm. Officers arrived at the scene and located a black Chevrolet parked in the driveway of 4507 Tracy Ave. Upon conducting a car check on the unoccupied Chevrolet officers observed what appears to be blood on the driver's seat of the vehicle. Officers were notified by dispatch personnel that an unknown black male (suspect) was in a local hospital being treated for a gunshot wound to his arm. The suspect (Terrence L. **Blanks**) lied about his name at the hospital giving "Randolph" as his last name. Officers contacted the girlfriend of **Blanks** who confirmed he resides in 4507 Tracy Ave and she received a phone call from **Blanks** telling her he had been shot and to meet him at the house, so she met him at 4507 Tracy and then drove him and his friend to the hospital.

Review of Surveillance Video from the store at 2711 Indiana revealed the Victim entering the store alone after he backed his white truck into a parking spot directly in front of the doors of the store. **Blanks** pulled up to Pump#6 and exited the driver's seat and walked into the store alone. The victim and the **Blanks** saw each other but did not acknowledge they knew each other. The victim is standing in line and a black female is standing at the counter. As **Blanks** walked in, the victim glanced in his direction and then turned back towards the counter. **Blanks** then switches his phone from his right hand to his left hand and places his right hand in the pocket of his grey hoodie. It appears he is grasping something in his front pocket. **Blanks** continued to say something to the victim who now appears to be trying to back away from **Blanks** and appears to be nervous. He drops his money but will not put his back to **Blanks**. **Blanks** continued to lean into the Victim saying something.

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As the black female at the counter leaves, the Victim makes a purchase and hurriedly exits the store and goes to his truck. He sits down in the front seat and reaches over in the seat. He is now talking to the female who exited the store who is parked next to him so both drivers' doors are open on both vehicles. As soon as the Victim exited the store, **Blanks** walked over to the door, then returned to the front counter, threw something on the counter, pulled out a black gun from the pocket of his hoody and walked out of the store. As he was walking out the front door, that was still open, he raised the gun in his right hand and fired and the Victim stands up from the driver's side of his truck and fired the gun in his right hand. They exchange gunfire and **Blanks** runs down the sidewalk in front of the store, loses one of his shoes, grabs his shoe and as he is running to his vehicle parked at Pump#6, he points towards his truck appearing to be trying to motion to someone in the truck. **Blanks** got to the passenger seat and then a black male appears at the rear passenger side of the truck and fires two more rounds at the direction of the Victim who was already lying in truck injured from a gunshot wound.

A witness was contacted who stated she was inside the store when the Victim and **Blanks** walked in. She said the Victim was standing behind her and as **Blanks** walked in, the Victim turned and looked at **Blanks** and then turned around and the following dialogue took place:

Blanks: What the fuck you looking at OG.

VIC: I don't even know you young buck.

Blanks: You might not we can make it do what it do.

VIC: Do you know who I am, I ain't no punk.

Blanks: Meet me outside then.

VIC: I ain't got time for this. I don't know you like that.

Blanks: You got me fucked up.

The witness said **Blanks** looked like he had hate in his heart. He had his hand in his hooded jacket pocket during the entire confrontation with the VIC. She stated **Blanks** was antagonizing the VIC and **Blanks** seemed upset when he walked in the store (on a cell phone). She further stated she thought **Blanks** was going to hurt the VIC inside of the business.

After exiting the business she sat in her vehicle. She observed the VIC exit the business and get into his truck. She observed the VIC get a handgun from under or around the area of the front seat of his truck. She told the VIC that **Blanks** wasn't worth it. The VIC uttered, "Man" at which time **Blanks** exited the business with a handgun in his hand. **Blanks** had pushed the door to the business open in an aggressive manner. Before the door to the business closed, **Blanks** fired shots at the VIC as the VIC sat in his truck. The VIC exited his truck and returned fire in the direction of the **Blanks**. **Blanks** fired back at the VIC.

She stated she ducked down protecting her children, however could still see the exchange of gunfire. She saw the VIC bleeding, and **Blanks** running to the west before north across the parking lot.

She stated **Blanks** motioned toward his truck and yelled, "Come on, come on".

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At some point **Blanks** stopped and more shots were fired in the direction of the VIC, from somewhere, however during this time the VIC was back in his truck dying.

She stated the VIC did not seem to know the SUS and appeared upset about the confrontation. The VIC wasn't in his car but for a few seconds when **Blanks** exited the store and started shooting at the VIC. The witness denied knowing the Victim or **Blanks**.

Blanks responded to Police Headquarters once he was released from the hospital for his injuries. Upon arrival, he was read the Miranda Waiver and he stated he understood and was willing to talk to the police. He stated the following: he went to the store located at 2711 Indiana to purchase gas and some "blunt wraps" with a friend. He stated when he walked into the store got into a verbal altercation with an older black male (Victim). During the argument, he put his hand on the handgun he had concealed in his front hoody pocket and he said the Victim knew he had a gun. He stated as the Victim was exiting the store, someone asked the Victim what he was going to do and the Victim responded with "you're going to see what I'm going to do". **Blanks** stated he saw the Victim exit the store and get into a white truck and close the door. **Blanks** stated he exited the store, prepared for a gun fight. He said the Victim exited the white truck so he pulled out his gun and fired in return. He said he was struck three times in the arm, ran to his truck and drove to his house at 4507 Tracy. He went inside and took off his grey hoodie and placed the gun on the couch near the grey hoodie. His girlfriend then took him to the hospital. **Blanks** said he had never seen the Victim before. When **Blanks** was asked about the second round of shots coming from near his vehicle, he only said his friend was outside of the vehicle but would not give any other information about what his friend was doing.

Blanks friend was interviewed and he lied about his whereabouts and denied being in the vehicle with **Blanks** at the gas station or being involved in the shooting. He stated he was sitting on the front porch of Blank's until he arrived home and had been shot.

Printed Name Det. Heather Leslie Signature Det. Heather Leslie

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

Judge

Circuit Court of _____ County, State of Missouri.