

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

Police# 16-001451
Prosecutor# 095429084
1716-CR
OCN# B2101649

COMPLAINT

STATE OF MISSOURI

vs.

James H. Francis Jr.
10438 Indiana Ave
Kansas City, MO 64137
DOB: 05/08/1997; 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 January 6, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly caused the death of Emorye Spriggs 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 (571.015-001Y19755299.0)

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 January 6 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 and/or another 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 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.

THE STATE OF MISSOURI

vs.

James H. Francis Jr.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Ashleigh A. Ragner (#63694)
Assistant Prosecuting Attorney
415 E. 12th St. 11th Floor
Kansas City, Missouri 64106
(816) 881-3555
ARagner@jacksongov.org

WITNESSES:

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

SGT Garry J. Eastwood, 1125 Locust, Kansas City, MO 64106

DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106

[REDACTED]
DET William R. Martin, 1125 Locust, Kansas City, MO 64106

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

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

PO Christopher Viesselman, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 11/08/2016

CRN: 16-001451

I, Det. Joe Nelson,4964
(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 1-6-16, at 8610 E. 114th ter in
(Date) (Address)

Kansas City, Jackson Missouri James Francis Jr
(County) (Name of Offender(s))

B/M 5-8-97, 511, 180, BK, BN committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 1-6-16 at approximately 1634 hours officers of the Kansas City Missouri Police Department were dispatched to 8610 E. 114 Ter, Kansas City, Jackson County Missouri regarding a shooting.

Upon arrival officers observed the victim Emorye M. Spriggs B/M 7-21-95 lying on the curb suffering from apparent gunshot wounds in his lower abdomen and his left hand.

As the victim was being loaded into the ambulance he stated he had been in a Saturn vehicle prior to being shot.

Officers contacted witness # [REDACTED] She stated she was in her room and heard people yelling outside and then heard a gunshot. She looked outside and observed 3 B/M's inside a newer red in color 4 door vehicle, the rear passenger of the vehicle appeared to be in his 20's wearing a white colored t-shirt and gray sweatpants, The driver of the vehicle was a B/M in his 20's, dark complexion, possibly having a mustache, wearing a black hat with several colors on it. The front passenger she recognized as Spriggs (who lives across the street). The B/M in the rear passenger seat shot Spriggs while inside the vehicle. The B/M got out of the vehicle and approached the open front passenger door. The B/M shot Spriggs another time. The B/M dragged the victim out of the front passenger seat leaving him lying on the ground. Witness #1 stated the driver of the vehicle was attempting to push the victim out of the vehicle. The B/M shooter got into the front passenger seat. The vehicle then fled from the scene. The driver did not exit the vehicle.

EMS responded to the scene and transported the victim to an area hospital where he died.

The Jackson County Medical Examiner's Office ruled the victim's cause of death to be gunshot wounds and the manner of death to be homicide.

PROBABLE CAUSE STATEMENT FORM

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Detectives contacted witness #2 [REDACTED], who is [REDACTED]. She stated she talked to the victim on the phone just prior to this incident. The victim asked her for a ride to his house but [REDACTED] was unable to give him one. On 01/06/2016 at 1621 hours she received a text from Spriggs stating "Why that I pick the phone up and couldn't hear baby JJ pick me up from mamas so I can get home". On 01/06/2016 at approximately "1630" hours, she arrived at the crime scene and observed Spriggs lying on the ground suffering from a gunshot wound. She asked the victim "who did it, who did it, who did this" and the victim told her "JJ and his little brother". She asked "where yo' gun at, where the gun at, where is the gun" and Spriggs told her "they took it" (his 10 MM handgun). She provided an Instagram photo and told detectives that is "JJ".

Detectives obtained the call detail records from Spriggs cell phone. Upon reviewing the call detail records, detectives observed the subject telephone number was called by the victim on 01/06/2016 at 1530 hours. The victim's phone received a phone call from the subject telephone number on 01/06/2016 at 1606 hours.

Jathaniel Odum B/M 9-5-95 was developed as a suspect.

Computer information revealed that James Francis Jr B/M 5-8-97 is a known associate of Odum. He is known to occupy a red Saturn Ion 4 door license UL2N4U/MO16.

On 1-7-16 at approximately 1900 hours officers stopped the vehicle in the area of 103rd and Grandview RD, Kansas City, Jackson County Missouri. The occupants were transported to 1125 Locust for questioning and the vehicle was towed to the city tow lot.

Detectives contacted, [REDACTED], who was the vehicle driver. She stated the vehicle belongs to her but on 1-6-16 Francis had her vehicle from approximately 1430-2100 hours. She does not know who he was with or where he was at. She stated she tried to contact him by phone during that time but Francis did not answer. [REDACTED] stated Francis and Odum are half-brothers [REDACTED] signed Consent to Search form allowing us to search her vehicle for evidence. Detectives and Crime Scene Personnel observed what appeared to be blood on the center console of the vehicle. Hemastix testing indicated that the substance was blood.

Detectives contacted, [REDACTED], who is [REDACTED]. She stated Francis is the person Odum refers to as his brother.

Francis was advised of his Miranda rights and questioned about this incident. Francis denied knowing Odum and stated he was with [REDACTED] all day.

Odum was advised of his Miranda rights and questioned about this incident. Odum denied knowing Francis and stated he was home alone all day.

Members of the Career Criminal Unit mapped the historical cell site locations around the time of the homicide for Odum's cell phone number. It indicated Odum's cell phone was in the area of the

PROBABLE CAUSE STATEMENT FORM

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homicide on 01/06/2016 at 1625 hours. The police were notified of the homicide on 01/06/2016 at 1634 hours.

On 10-17-2016, the Kansas City Police Crime Laboratory reported the substance that appeared to be blood recovered from [redacted] vehicle is the victim's blood.

Printed Name Det. Joe Nelson, 4964 Signature *Det Nelson 4964*

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

Judge

Circuit Court of _____ County, State of Missouri.

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

Police# 16-001451
Prosecutor# 095429087
1716-CR
OCN# W0007222

COMPLAINT

STATE OF MISSOURI

vs.

**Jathaniel M. Odum
1311 E. 83rd Terr.
Kansas City, MO 64134
DOB: 09/05/1995; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

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

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

PO Christopher Viesselman, 1125 Locust, Kansas City, MO 64106

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CRN: 16-001451

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I have probable cause to believe that on 1-6-16, at 8610 E. 114th ter in
(Date) (Address)

Kansas City, Jackson Missouri Odum, Jathaniel (aka: JJ)
(County) (Name of Offender(s))

B/M 9-5-95, 510, 120, BK, BN committed one or more criminal offense(s).
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Officers contacted witness #1 [redacted]. She stated she was in her room and heard people yelling outside and then heard a gunshot. She looked outside and observed 3 B/M's inside a newer red in color 4 door vehicle, the rear passenger of the vehicle appeared to be in his 20's wearing a white colored t-shirt and gray sweatpants, The driver of the vehicle was a B/M in his 20's, dark complexion, possibly having a mustache, wearing a black hat with several colors on it. The front passenger she recognized as Spriggs (who lives across the street). The B/M in the rear passenger seat shot Spriggs while inside the vehicle. The B/M got out of the vehicle and approached the open front passenger door. The B/M shot Spriggs another time. The B/M dragged the victim out of the front passenger seat leaving him lying on the ground. Witness #1 stated the driver of the vehicle was attempting to push the victim out of the vehicle. The B/M shooter got into the front passenger seat. The vehicle then fled from the scene. The driver did not exit the vehicle.

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Odum was advised of his Miranda rights and questioned about this incident. **Odum** denied knowing **Francis** and stated he was home alone all day.

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On 10-17-2016, the Kansas City Police Crime Laboratory reported the substance that appeared to be blood recovered from [redacted] vehicle is the victim's blood.

Printed Name Det. Joe Nelson, 4964 Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.