

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

<b>POLICE NO. :</b>	17-005344
<b>PROSECUTOR NO. :</b>	095437553

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>THOMAS E. MIDGETTE JR.</b>	)	
<b>8150 1/2 Troost Ave.,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64131</b>	)	<b>DIVISION</b>
<b>DOB: 09/12/1962</b>	)	
<b>Race/Sex: B/M;</b>	)	
<b>SSN: [REDACTED]</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 1st Degree (565.020-001Y19840903.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **Class A Felony of Murder in the First Degree** punishable upon conviction under Section 565.020, RSMo, in that on or about January 21, 2017, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Raymond Jones 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 (571.015-001Y19755213.0)**

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 on or about January 21, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First 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 First 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

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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,

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

**WITNESSES:**

PO Jeremy Chick, 1125 Locust, Kansas City, MO - 64106  
DET Scott M. Emery, 1125 Locust, Kansas City, MO - 64106  
Raymond C Jones, 1209 E. 83rd St., #9, Kansas City, MO - 64131  
PO Joshua J. Kelly, 1125 Locust, Kansas City, MO - 64106  
DET Scott P. Mullen, 1125 Locust, Kansas City, MO - 64106  
PO Drew D. Pittenger, 1125 Locust, Kansas City, MO - 64106  
DET Hobart D. Price, 1125 Locust, Kansas City, MO - 64106  
DET Brent R. Taney, 1125 Locust, Kansas City, MO - 64106  
DET Daniel G. Thomas, 1125 Locust, Kansas City, MO - 64106  
██████████, Prosecuting Atty. Office, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02/20/2017

CRN: 17-005344

I, Detective Hobart Price #5254  
(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 01/21/2017, at E 82 Te/ Troost Ave in  
(Date) (Address)

Kansas City, Jackson Missouri Thomas E. Midgette Jr  
(County) (Name of Offender(s))

black, male, 6'01", 178 lbs, DOB: 09/12/1962, SSN [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 01-22-2017 at 0002 hours, Officers of the Kansas City Missouri Police Department were dispatched to the area of 82nd Ter/Troost in regard to an ambulance call. Upon arrival the victim was located on the east side of Troost Ave, to the north west of the Family Dollar. The victim was deceased from apparent gunshot wounds. The victim was later positively identified as Raymond C. Jones, B/M, 9/29/1958. The victim suffered from two apparent gunshot wounds. A yellow 20 gauge spent shotgun shell was found near the victim.

The victim's girlfriend (Witness #1) was contacted and stated she lives with the victim at 1209 E. 83 St. #9. The Victim and the Victim's friend, **Thomas E Midgette B/M 09/12/1962** got into a fight at 1209 E. 83 St. #9. Witness #1 stated the victim punched **Thomas Midgette** in the nose at which time **Thomas Midgette** left the apartment. A while later the victim left the apartment to go purchase beer at the Troost Market located at 8001 Troost Ave. Witness #1 stated the victim never returned home. Witness #1 stated **Thomas Midgette** came over to her apartment after the victim had gone to go buy beer. **Thomas Midgette** was still upset about being hit in the nose. **Thomas Midgette** told Witness #1 "Not to worry because you won't see Raymond anymore." **Thomas Midgette** told Witness #1, the victim was up by the Family Dollar. At the time **Thomas Midgette** was telling Witness #1 about the victim being at the Family Dollar the victim was already deceased and the identity of the victim was unknown to Police. A suspect was developed and a photo lineup presented to Witness #1 who positively identified **Thomas E. Midgette, B/M, 09/12/1962** in the photo lineup.

Surveillance video was obtained from several surveillance cameras in the area of E 82 Ter / Troost. Surveillance video shows **Thomas Midgette** leaving the victim's apartment and holding his nose. **Thomas Midgette** is seen walking towards his apartment at 8150 1/2 Troost #53. **Thomas Midgette** is seen walking back to the Victim's apartment and then following the Victim on foot as he walks towards the Troost Market. Surveillance video shows **Thomas Midgette** changed clothing into a distinct black and white patterned hooded jacket. Surveillance video shows **Thomas Midgette** carrying a gun while he is following the victim. Surveillance video shows **Thomas Midgette** approach the victim and the victim falls to the ground near 82 Ter/ Troost on the east side of Troost. **Thomas Midgette** is seen standing over the victim and shooting the victim. What appears to be muzzle flash from a firearm is observed on surveillance video.

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A search warrant was obtained for the apartment of **Thomas Midgette** (8150 1/2 Troost #53). During a search of his residence the distinct black and white patterned hooded jacket was recovered which **Thomas Midgett** is seen wearing while following the victim with a gun. Numerous live yellow 20 gauge shotgun shells were found in the apartment belonging to **Thomas Midgette**.

**Thomas Midgette** was arrested and transported to Police Headquarters. **Thomas Midgette** was read the Miranda warning and waiver. Thomas advised he understood his rights and wanted to speak with Police. During the interview **Thomas Midgette** initially denied involvement in the murder of the victim. During the course of the interview **Thomas Midgette** was shown photographs from the surveillance video. **Thomas Midgette** confessed to shooting the victim. Thomas admitted the pictures in the surveillance video were him. **Thomas Midgette** admitted the black and white patterned coat he was seen wearing in the surveillance video belonged to him. **Thomas Midgette** stated he got rid of the gun he used to shoot the victim.

Printed Name Detective Hobart Price #5254 Signature *Hobart Price #5254*

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.