

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

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| POLICE NO. : | 17-010974 |
| PROSECUTOR NO. : | 095438300 |

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|--------------------------------|---|-------------------------|
| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| JAYVONN M. DAVIS |) | |
| 5301 Byrams Ford Road, |) | CASE NO. 1716-CR |
| Kansas City, MO - 64130 |) | DIVISION |
| DOB: 02/05/1998 |) | |
| Race/Sex: B/M; |) | |
| SSN: XXX-XX-1550 |) | |
| |) | DEFENDANT. |

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171207.0)

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 February 13, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another forcibly stole U.S. Currency and guns the possession of [REDACTED] and in the course thereof defendant displayed and threatened the use of what appeared to be 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. This is an 85% sentenced felony.

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 February 13, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count One, 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.

State vs. Jayvonn M. Davis

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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.

Count III. Burglary 1st Degree (569.160-001Y19792204.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 13, 2017, in the County of Jackson, State of Missouri, the defendant knowingly remained unlawfully in an inhabitable structure, located at 8 [REDACTED] Wincheseter Ave, Kansas City, MO and possessed by [REDACTED], for the purpose of committing stealing therein, and while in such an inhabitable structure the defendant was armed with a deadly weapon.

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.

State vs. Jayvonn M. Davis

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
415 E. 12th Street, Fl 7M
Kansas City, MO - 64106
(816) 881-4592
jbaldwin@jacksongov.org

WITNESSES:

DET Jennifer A. Blythe , 1125 Locust, Kansas City, MO - 64106

PO Kevin M. Green , 1125 Locust, Kansas City, MO - 64106

██
██████ , Prosecuting Atty. Office, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03/06/2017

CRN: 17-10974

I, Detective Jennifer Blythe #5490, Kansas City, Missouri 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 02/13/2017, at 8311 Winchester Ave in
(Date) (Address)

Kansas City, Jackson Missouri Jayvonn Davis
(County) (Name of Offender(s))

B/M 02/05/1998 SSN# committed one or more criminal offense(s).
(Description of Identity)

Robbery-1st Degree
Armed Criminal Action

The facts supporting this belief are as follows:

On 02/13/2017 at 1412 hours, Officers were dispatched to 8311 Winchester Ave Kansas City, Jackson County, Missouri in regard to an armed residential robbery.

Detectives later interviewed the victims. Victim #1 stated that following: On her way home she turned off of 84th Street and onto Winchester Ave when she noticed two black male suspects going across her yard. She pulled into her driveway and stopped to ask them what they were doing. Both suspects told her they had lost their dog and each suspect had a photograph of a dog on their cell phone. She told the suspects that she hadn't seen the dog and that she would go inside of her house to get a piece of paper in order to write their contact information. She then pulled into her garage and the suspects followed her inside of the garage. Her husband, victim #2, was inside of the house and heard male voices in the garage so he opened the door. The suspects then went inside of the house with her and one of the suspects wrote a phone number on a piece of paper. Just as the suspect wrote down the phone number, the other suspect, later identified as Jayvonn Davis B/M 02/05/1998, put her in a choke hold with his left arm and placed a gun against her head with his right hand. Both of the suspects then yelled while they demanded money and guns. Davis threw her to the ground and still had the gun to her head. The suspects continued to demand guns and money and threatened to kill her if he did not get it. Victim #1 then told the suspects about a can of coins on the counter and a suspect, later identified as Dominick Sanders B/M 08/09/1997, swept it off of the counter. A suspect said repeatedly, "I know you've got guns in here, I know you've got guns in here." She told the suspects there was a gun underneath one of the chairs and one of the suspects threw the chair across the room and collected the gun. The suspects were not satisfied with the one gun and said, "I know you've got more." After the suspects continued to threaten to kill her, victim #2 told them he had a gun upstairs. One of the suspects then led victim #2 upstairs with a gun pointed to his back. She and victim #2 told the suspects they had money in a cabinet upstairs in her living room which contained about \$150-\$200. After the suspects got the money they continued to demand guns. The victims then led the suspects to their bedroom and as Davis still had his arm around her neck, Sanders pulled out dresser drawers. The suspects discovered one drawer that contained a few rounds of ammunition. Davis then became more aggressive with his demands for guns and they told him about a gun under their mattress. After Sanders retrieved that gun they continued to demand more guns. Davis dragged her down the steps with his arm around her neck and the other Sanders had a gun to victim #2's back as they dragged her down the stairs. The suspects then made the victims lay down on the floor and continued to yell. Victim #1 stated that she did not think she could identify the suspect that was wearing the red hood because it was around his face. Victim #1 was asked if they had anything outside of their house indicating they would have guns and she stated that they have an American flag on the outside of their house and victim #2 wears a Vietnam Marine Corps hat everywhere he goes.

Victim #2 was interviewed and his statement concurred with victim #1's statement. Victim #2 stated that he and victim #1 remembered the suspects' involvement differently and he believed the suspect wearing all black had victim #1 throughout the incident and the suspect wearing red had him throughout the incident. Victim #1 remembered it the other way around. Victim #2 also stated that Davis placed a knife against victim #1's neck as he dragged her down the stairs. Victim #2 stated that the knife belonged to him and it

PROBABLE CAUSE STATEMENT FORM

CRN 17-10974

was a boy scout knife the suspect found from the change can. Victim #2 stated both suspects had blue semi-automatic guns. Victim #2 did not think he could identify the suspect wearing all black.

Within days of the robbery detectives were contacted by three department members that advised they believed Sanders to be one of the suspects. Sanders is known to reside at 8011 E. 80th Street (1.3 miles from the victims' address). Sanders also is known by department members to commit burglaries and has been documented in a report telling a witness that he was looking for a lost dog when he was confronted for prowling. Sanders is also linked by surveillance video to a burglary committed on 2/05/2017 that occurred at 8126 E. 80th Terrace while in a gray Kia.

On 2/21/2017, a contact and advise order was issued for Sanders regarding this robbery. On 2/22/2017, Sanders was arrested by officers and booked in on an unrelated offense.

On 2/22/2017, Sanders was interviewed by detectives after he waived his rights. Sanders stated that he and "Jordan", whose real name is Javvonn, were dropped off in front of the victims' house by a friend in the gray Kia. Sanders denied knowing what was going to happen and stated that Jayvonn planned it all without telling him. Sanders stated Jayvonn told him to pull up a photograph of a dog on his phone and show it to victim #1. Sanders then stated Jayvonn was the only one with a gun until he retrieved the victims' guns. Sanders stated that Jayvonn was the suspect that choked victim #1 and Sanders was the one that retrieved the guns and money. Sanders stated that his DNA will be on the pencil used to write down the phone number and the change can. In Sander's interview, he revealed details of the robbery that were consistent with the victim's account of the incident and only could be known if he were present.

The total loss in the robbery included a Rugar 357 (serial #172-12638), a Rugar GP 100 revolver (serial #174-33509) and \$150-\$200 in currency.

Department resources were utilized to determine Jayvonn was Davis. A recent report (CRN 17-9383) corroborated the incident Sanders described behind Church's Chicken. Further intelligence gathering regarding Davis revealed him to go by the nickname "Jordan" as previously stated by Sanders. Davis also matches the physical description given by Sanders of the second suspect.

On 2/24/2017, Sanders was contacted by detectives and waived his Miranda Rights once more. A single booking photograph of Davis was shown to Sanders and he positively identified Davis as the second suspect.

On 2/24/2017, a stop order was issued for Davis and on 3/06/2017 he was arrested and transported to East Patrol Division where he was questioned by detectives after waiving his Miranda Rights. Davis initially denied any knowledge or involvement in the robbery. Later in the interview, Davis stated that Dominick Sanders and Sanders' cousin, "Cleezy", along with two others committed the robbery. Davis said he was sure they picked him up at 1000 hours and said they had just done that robbery. I then explained to Davis that the robbery did not happen until around 1400 hours.

Printed Name Det. Jennifer Blythe, #5490 Signature Det Jennifer Blythe #5490

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**

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|-------------------------|-----------|
| POLICE NO. : | 17-002220 |
| PROSECUTOR NO. : | 095438299 |

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|--------------------------------|---|-------------------------|
| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| JAYVONN M. DAVIS |) | |
| 5301 Byrams Ford Road, |) | CASE NO. 1716-CR |
| Kansas City, MO - 64130 |) | DIVISION |
| DOB: 02/05/1998 |) | |
| Race/Sex: B/M; |) | |
| SSN: XXX-XX-1550 |) | |
| |) | DEFENDANT. |

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171204.0)

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 January 9, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully acting in concert with others forcibly stole gun 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.

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 9, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count One, 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.

State vs. Jayvonn M. Davis

DET Jacob A. Shroyer , 1125 Locust, Kansas City, MO - 64106

DET Christopher S. Skinner , 1125 Locust, Kansas City, MO - 64106

DET Kevin M. White , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03/06/2017

CRN: 17-2220

17-10974

I, Detective Chris Skinner #5012, Kansas City, Missouri 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 01/09/2017, at 3410 Troost Ave in
(Date) (Address)

Kansas City, Jackson County Missouri Jayvonn Davis
(County) (Name of Offender(s))

B/M, 02/05/1998, SSN [redacted] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

Armed Robbery
Possession of Stolen Property

On 01/09/2017 at 2029 hours, Officers were dispatched to 3410 Troost Ave, Save-A-Lot, in regard to an armed robbery. Officers contacted victim [redacted] who stated the following: while working as an armed security guard he escorted a store employee, victim [redacted] to the dumpster behind the store to throw out trash. Four unknown black males approached them armed with handguns. One suspect put a gun to the back of his head while another suspect took his handgun out of his holster. After the suspects took his gun they all fled to the west on foot. Victim ([redacted]s) gun was described as a black Beretta PX4 Storm .40 caliber semi-automatic handgun with Serial #PY45072.

Officers contacted victim [redacted] and his statement was consistent with that given by victim ([redacted]). Victim [redacted] added that he was told to get on his knees at gunpoint while the other suspects took victim [redacted] gun.

During an unrelated armed residential robbery investigation that was reported on 02/13/2017 (CRN 17-10974) Jayvonn Davis b/m 02/05/1998 was developed as a suspect.

On 03/06/2017 at approximately 1113 hours, Officers conducted a residence check for Davis in regard to a stop order that had been issued for CRN 17-10974. Davis was taken into custody after Officers observed him throw down a handgun. A computer check of the handgun revealed it to be the stolen Beretta .40 caliber taken during the robbery reported on CRN 17-2220.

Davis was transported to East Patrol for booking.

On 03/06/2017 victim [redacted] responded to the Robbery Unit and identified Davis from a photo line-up as the person who had pointed a silver handgun at him and the other victim during the robbery. Victim [redacted] added that Davis had been wearing a blue hood over his head during the robbery.

PROBABLE CAUSE STATEMENT FORM

CRN 17-2220

17-10974

Victim (C.P.) also responded to the Robbery Unit and did not identify **Davis** from a photo line-up.

On 03/06/2017 at approximately 1519 hours, Detectives contacted **Davis** at East Patrol and read aloud his Miranda Rights. **Davis** said he understood his rights and agreed to speak with Detectives. **Davis** denied any involvement in the robbery reported on CRN 17-2220 and said he purchased the Beretta from a person he knows only as Abdul for \$350.00.

Printed Name Det. Chris Skinner #5012

Signature *Det. Chris Skinner #5012*

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

Judge

Circuit Court of _____ County, State of Missouri.