

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

POLICE NO. :	17-047848
PROSECUTOR NO. :	095439759

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JOHN C YOUNG)	
716 N. Belvidere Ave.,)	CASE NO. 1716-CR
Independence, MO - 64056)	DIVISION
DOB: 01/11/1972)	
Race/Sex: W/M;)	
SSN: XXX-XX-████)	
)	DEFENDANT.

COMPLAINT

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 on or about May 25, 2017, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Christopher Hutson caused the death of Christopher Hutson by shooting him.

OR IN THE ALTERNATIVE

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 on or about May 25, 2017, in the County of Jackson, State of Missouri, Christopher Hutson was killed as a result of the perpetration of the Class A Felony of Unlawful Use of a Weapon under Section 571.030.9, RSMo, committed by the Defendant on or about May 25, 2017 in the County of Jackson, State of Missouri.

An individual convicted and sentenced for these offenses shall not be eligible for parole until eighty-five percent of the sentence is served.

State vs. John C Young

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 May 25, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant 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.

Count III. Discharge/Shoot Firearm At Or From Motor Vehicle/shoot At Person, Another Motor Vehicle, Or Building (571.030-001Y20035213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the Class A Felony of Unlawful Use of a Weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about May 25, 2017, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a blue Chevrolet Cruze, a motor vehicle, and as a result of the above described conduct, Christopher Hutson suffered injury or death.

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 10 (10) years and not to exceed thirty (30) years.

Count IV. 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 May 25, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon, charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant

State vs. John C Young

committed the foregoing felony of Unlawful Use of a Weapon 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Luke H. Alsobrook
Luke H. Alsobrook (#66442)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, MO - 64106
(816) 881-3550
LHAlsobrook@jacksongov.org

WITNESSES:

DET Alane M. Booth , 1125 Locust, Kansas City, MO - 64106
DET Donna M. Drake , 5301 E. 27th Street, Kansas City, MO - 64127
Christopher Hutson , Prosecuting Atty. Office, Kansas City, MO - 64106
PO Mark A. Ising , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

DET Darin K. Penrod , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

DET Mark A Slater , 1125 Locust, Kansas City, MO - 64106
PO Christopher S. Smith , 1125 Locust, Kansas City, MO - 64106
PO Alexander E. Wasser , 1125 Locust, Kansas City, MO - 64106
DET Jeremy D. Wells , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/02/2017

CRN: 17-047848

I, Det. Donna Drake #5573 (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 05/25/2017 (Date), at 104th Street/Holmes Rd (Address) in

Kansas City, Jackson (County) Missouri Young, John C Jr (Name of Offender(s))

w/m 01/11/1972, 5'10, 249 lbs, s.s. (Description of Identity) committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 05/25/2017 at approximately 1617 hours, Officers of the Kansas City Missouri Police Department were dispatched to 104th Street and Holmes Road, Kansas City, Jackson County, Missouri 64131 in regard to a reported "Shooting." Upon arrival, Officers located a black male and a black female who were suffering from apparent gunshot wounds associated with a gold four door 2005 Chevrolet Impala. The b/m was observed to be in the driver's seat with apparent head trauma. The b/f, the front right seat passenger, 7 months pregnant, was observed to have non-life threatening trauma to the left side of her head. Both were transported to area hospitals. The b/m, identified as Christopher Hutson, b/m, 5/12/1998, died as a result of his injuries from an apparent gunshot wound. The b/f, was admitted, but ultimately treated and released. The Jackson County Medical Examiner's Office ruled the death as Homicide.

On 05/29/2017 detectives interviewed the surviving victim/witness. The Witness stated that she and her boyfriend, Hutson, had just left a scheduled sonogram appointment, and were attempting to return to her residence and were traveling in the gold 2005 Chevrolet Impala when they became disoriented during rush hour traffic, sometime after 1600 hours on 5/25/17. Hutson was driving. The witness stated Hutson exited from 435E and made a northbound turn onto State Line Rd, and then eastbound onto 103rd St. Hutson was traveling slowly eastbound on 103rd St. Hutson was looking at his phone. The Witness was attempting to check her phone also in an attempt to assist in determining their location, and she believed Hutson was doing the same on his cell phone. The witness stated as they reached the traffic light and stopped at the intersection of 103rd Street and Wornall Rd., she and Hutson observed a blue four door sedan pull up next to the passenger side of their vehicle. The Witness described the w/m driver as unshaven, bald. As the w/m driver pulled up parallel to Hutson's vehicle, the w/m driver yelled at them, "Learn to fucking drive" and the w/m driver proceeded eastbound on 103rd St.. Hutson proceeded eastbound on 103rd St, and the Witness described Hutson was tail gating the w/m driver as they traveled eastbound to Holmes Rd. Both vehicles made a southbound turn on Holmes Rd from 103rd St. The witness stated as the w/m driver approached the area of the eastbound 435 entrance ramp from Holmes Rd, Hutson pulled up next to the driver's side of the w/m's blue vehicle. The Witness stated Hutson intended to say something to the w/m driver. The Witness's passenger window was down. When Hutson pulled up next to the w/m, she described as approximately 35-40 years of age with scruffy facial hair. The w/m produced a handgun

PROBABLE CAUSE STATEMENT FORM

CRN 17-047848

and shot towards Hutson's vehicle front passenger window. She realized the w/m had a firearm, and then the Witness realizes she and Hutson have come to a stop on the street near 104th St, southbound on Holmes Rd, Jackson County, Kansas City, Missouri. The Witness stated Hutson was not armed, and had not said anything prior to being shot at by the w/m driver.

The Witness confirmed a still photo image of a blue four door vehicle driven by a w/m occupant which was created from video surveillance footage collected during the course of the investigation consistent with the route describe by the Witness. The Witness stated the blue vehicle in the still photo image was the vehicle driven by the w/m shooter. The driver depicted in the still photo image appeared to be a bald w/m.

On 05/31/2017 at approximately 1616 hours, the Kansas City Missouri Police Department's Media Unit released the image of the blue four door sedan and unknown bald w/m driver to the media outlets for broadcast to generate leads in the investigation to identify the w/m driver.

On 06/01/2017, detectives were contacted by an individual who reached out to the Homicide Unit and provided the name of John Young, w/m, 1/11/72, as believed to be the driver depicted in the media released image of the blue vehicle in regard to the road rage homicide. The caller was subsequently interviewed and stated Young has driven a blue Chevrolet Cruz for several years and is employed in the area of Bannister and Troost Av, and was working on the day of the shooting, 5/25/17. The Witness called Young directly and advised Young he had seen the image released by the media of a driver in a blue car in relation to the road rage homicide and asked Young directly if it was him. Young advised the Witness he had retained an attorney and was not at liberty to discuss the matter. Young also asked the Witness, "How did you know?" The witness also stated Young is always armed with a firearm when driving and categorized Young as an aggressive driver. The Witness explained he has known Young for several years and sees him regularly and positively identified a single color photo of Young as John C. Young, w/m, 1/11/72.

Detectives conducted a computer check to determine vehicle registration for Young and the computer check revealed Young is registered to a four door 2012 Chevrolet Cruz. An additional computer check revealed traffic cameras had captured images of a license plate, consistent with Young's vehicle registration associated with a four door blue Chevrolet Cruze.

On 06/02/2017, Hutson's gold Chevrolet Impala was processed and obtained blue paint transfer from the passenger's side rear wheel well and the trim associated with the passenger side rear door of the Impala.

On 06/02/2017 at approximately 0700 hours, Young was arrested on a 24 Hour Investigative HOLD in regard to the homicide investigation. Young was advised of his Miranda Rights and during his contact with investigators he confirmed he had a self-defense story, but wished to tell it with his attorney present.

On 06/02/2017, a Search Warrant was executed on Young's residence in Independence, Jackson County, Missouri 64056. Detectives located Young's registered blue four door 2012 Chevrolet Cruze with no front plate, as depicted in the surveillance still image of the blue four door vehicle released to the media outlets. Young's blue Chevrolet Cruz was observed parked in the garage associated with his residence with only a rear MO

PROBABLE CAUSE STATEMENT FORM

CRN 17-047848

license plate, consistent with the traffic camera images. Apparent damage was observed slight damage on the left rear quarter panel above the tire.

On 06/02/2017, the surviving victim/witness was recontacted and was transported to 1125 Locust St, and was presented with six individual photographs of white males similar in appearance which included a current MO DOR image of John C. Young, w/m, 1/11/72. The Witness selected the image of Young and identified the w/m in the image as the shooter.

Printed Name Det. Donna Drake #5573 Signature s/ Det. Donna Drake #5573

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

Judge

Circuit Court of _____ County, State of Missouri.