

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-001644
PROSECUTOR NO. :	095440455

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
CHRISTOPHER J. CLEMONS)	
913 S. Hocker,)	CASE NO. 1716-CR
Independence, MO - 64050)	DIVISION
DOB: 11/16/1999)	
Race/Sex: W/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), 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 July 17, 2017, at 913 S. Hocker, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a 2006 silver chevy cobalt, and, as a result of the above described conduct, [REDACTED]. 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 ten (10) years and not to exceed thirty (30) years, or life imprisonment.

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.

STATEMENT OF PROBABLE CAUSE

Date: 07/19/2017

I, Detective Josko Wrabec, a sworn Peace Officer with the Sugar Creek, Missouri Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that on or about 07/17/2017, Christopher Clemons, W/M, DOB 11/16/1999, SSN [REDACTED], 913 S Hocker, Jackson County, Independence, MO, committed one or more criminal offenses in Jackson County, Missouri.

The facts supporting this belief are as follows:

On 07/17/2017 at 0359 hours, Officer Stone was dispatched to Express Mart, 11622 US 24 Hwy. Sugar Creek, Missouri, in regard to reports of shots fired.

Upon arrival, Officer Stone observed eight brass like casings laying on the ground appearing to be .223 (5.56mm) rounds in the parking lot of the gas station. A perimeter was created and I was contacted to respond for investigation. It should be noted, while en-route, Centerpoint Hospital contacted dispatch and informed them they had a victim being treated for a gunshot injury to the leg.

To begin the investigation, I contacted the witness who had observed the shooting. The witness, [REDACTED], advised he was parked near the victim's vehicle, a 2006 silver chevy cobalt, in the front parking spaces of the gas station. He observed the victim vehicle back out as another, similar vehicle, pulled up to the victim. He then observed a skinny black male exit the victim's vehicle, yelling at the suspect vehicle then return to the passenger seat of the vehicle. At that time, both vehicles began driving around the parking lot of the gas station. While driving, an unknown person from the suspect vehicle fired at the victim's vehicle approximately 6-7 times. He described the suspect vehicle as a silver cobalt with multiple occupants. After speaking with [REDACTED] I responded to Centerpoint Hospital to interview the victim in this case that was being treated for the gun shot injury to the leg.

Once in the emergency room of Centerpoint Hospital, I contacted [REDACTED] and inquired to her what had occurred. [REDACTED] stated she and her friends had responded to Express Mart for drinks. While en-route she noticed a vehicle following her. She believed the vehicle was being driven by a subject, [REDACTED]), girlfriend of Juan Wrinkle "Suspect". Juan had previously been contacting/harassing [REDACTED] regarding him dating [REDACTED]. It should be [REDACTED] is the current boyfriend of [REDACTED] and was in the passenger seat of the vehicle during the incident.

To continue the investigation, I responded back to GHQ where I interviewed a juvenile witness who was a passenger of the victim vehicle. The juvenile advised Juan had responded to an apartment that [REDACTED] and [REDACTED] were at. The juvenile stated [REDACTED] told him he was going to go down stairs and fight Juan. [REDACTED] responded downstairs to the driver's side of the silver cobalt, however, he did not fight Juan. Sometime later, the juvenile left the apartment with [REDACTED] [REDACTED] and [REDACTED]. All of the occupants noticed that a vehicle was following them and assumed it was Juan.

Upon arrival to Express Mart, [REDACTED] and the juvenile responded inside for drinks. Once they returned and attempted to leave, Juan was in the suspect vehicle with [REDACTED] the driver, pulled in front of the victim's vehicle. [REDACTED] jumped out, yelled at the vehicle then returned back to the passenger seat. The juvenile

explained that while they were driving towards the exit of the gas station, shots began being fired and bullets were striking the vehicle he was in. The victim [REDACTED] then responded to the Phillips 66 gas station at the corner of Forest and US 24 Hwy where she advised she could not drive due to being shot in the leg. She was then helped to the passenger side before being drove to Centerpoint Hospital.

It should be noted, vehicle registration shows a silver Cobalt matching the suspect vehicle description registered to Juan's mother [REDACTED] at Juan's known address 16616 E Larkspur Ln Apt #5.

Upon arrest and interview of Jaun, he stated the shots were fired from the rear driver's side window by a subject identified as Christopher Clemons W/M 11-16-1999. Furthermore, he stated the "AR-15" belonged to Christopher. Jaun informed me that Christopher lived off of 23rd st on Hocker St. A check of Christopher's DOR revealed his address to be 913 S Hocker St., Independence, MO 64050. Christopher was later arrested during service of a search warrant at that address.

It should be noted, an AR-15 long gun along with PMC .223 ammunition, as well as receipts for both items were located in the bedroom and garage of Clemons residence. Furthermore the ammunition located was the same brand as that found at the crime scene.

Christopher refused to speak with me, however, the following statements were made and recorded via.

Jail video:

Jaun- "I'm in here because I set the whole thing up."

Christopher-"I've got 5k at home."

Jaun-"They told me no bondsman because we shot someone."

Christopher-"What the fuck, I did."

Jaun-"Did you get rid of that?"

Christopher-"Fuck no."

Jaun-"Dumbie! We have to tell them it was self-defense."

Christopher-"Either you shoot first or you get shot."

Jaun-"Chris...Tell it to them how we talked about."

Christopher-"I don't talk to cops I aint no snitch!"

Jaun-"I think lopez or louis already told them."

Christopher-"Lopez is dead when I see him I don't give a fuck!"

Det. Josko Wrabec #929

Signature

The Court Finds Probable Cause:

Judge

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-001644
PROSECUTOR NO. :	095440456

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JUAN WRINKLE)	
16616 E. Larkspur Lane, Apt. 5)	CASE NO. 1716-CR
Independence, MO - 64055)	DIVISION
DOB: 12/15/1999)	
Race/Sex: W/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

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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.

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. Juan Wrinkle

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050
(816) 881-4488
hwilliams@jacksongov.org

WITNESSES:

[REDACTED]

SGT Kirk Beeman , 1001 Heroes Way, Independence, MO - 64054
PO Molly Brackeen , 1001 Heroes Way, Independence, MO - 64054
PO Victor Contreras , 1001 Heroes Way, Sugar Creek, MO - 64054
CPT Matthew C. Kline , 1001 Heroes Way, Sugar Creek, MO - 64054

[REDACTED]

PO Mark Mika , 1001 Heroes Way, Independence, MO - 64054

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO Aaron Stone , 1001 Heroes Way, Independence, MO - 64054
PO Josko Wrabec , 2916 Iva Dr., Independence, MO - 64057

STATEMENT OF PROBABLE CAUSE

Date: 07/19/2017

I, Detective Josko Wrabec, a sworn Peace Officer with the Sugar Creek, Missouri Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that on or about 07/17/2017, Jaun Wrinkle, W/M, DOB 12/15/1999, SSN [REDACTED] 16616 E Larkspar, Jackson County, Independence, MO, committed one or more criminal offenses in Jackson County, Missouri.

The facts supporting this belief are as follows:

On 07/17/2017 at 0359 hours, Officer Stone was dispatched to Express Mart, 11622 US 24 Hwy. Sugar Creek, Missouri, in regard to reports of shots fired.

Upon arrival, Officer Stone observed eight brass like casings laying on the ground appearing to be .223 (5.56mm) rounds in the parking lot of the gas station. A perimeter was created and I was contacted to respond for investigation. It should be noted, while en-route, Centerpoint Hospital contacted dispatch and informed them they had a victim being treated for a gunshot injury to the leg.

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Once in the emergency room of Centerpoint Hospital, I contacted [REDACTED] and inquired to her what had occurred. [REDACTED] stated she and her friends had responded to Express Mart for drinks. While en-route she noticed a vehicle following her. She believed the vehicle was being driven by a subject, [REDACTED]), girlfriend of Juan Wrinkle "Suspect". Juan had previously been contacting/harassing [REDACTED] regarding him dating [REDACTED] It should be noted, [REDACTED] is the current boyfriend of [REDACTED] and was in the passenger seat of the vehicle during the incident.

To continue the investigation, I responded back to GHQ where I interviewed a juvenile witness who was a passenger of the victim vehicle. The juvenile advised Juan had responded to an apartment that [REDACTED] and [REDACTED] were at. The juvenile stated Isaiah told him he was going to go down stairs and fight Juan. [REDACTED] responded downstairs to the driver's side of the silver cobalt, however, he did not fight Juan. Sometime later, the juvenile left the apartment with [REDACTED], [REDACTED] and [REDACTED]. All of the occupants noticed that a vehicle was following them and assumed it was Juan.

Upon arrival to Express Mart, [REDACTED] and the juvenile responded inside for drinks. Once they returned and attempted to leave, Juan was in the suspect vehicle with [REDACTED], the driver, pulled in front of the victim's vehicle. [REDACTED] jumped out, yelled at the vehicle then returned back to the passenger seat. The juvenile

explained that while they were driving towards the exit of the gas station, shots began being fired and bullets were striking the vehicle he was in. The victim [REDACTED]. then responded to the Phillips 66 gas station at the corner of Forest and US 24 Hwy where she advised she could not drive due to being shot in the leg. She was then helped to the passenger side before being drove to Centerpoint Hospital.

It should be noted, vehicle registration shows a silver Cobalt matching the suspect vehicle description registered to Juan's mother Jennifer Martinez at Juan's known address 16616 E Larkspur Ln Apt #5.

Upon arrest and interview of Jaun, he stated the shots were fired from the rear driver's side window by a subject identified as [REDACTED] W/M 11-16-1999. Furthermore, he stated the "AR-15" belonged to [REDACTED] r. Jaun informed me that [REDACTED] lived off of 23rd st on Hocker St. A check of [REDACTED] s DOR revealed his address to be 913 S Hocker St., Independence, MO 64050. [REDACTED] was later arrested during service of a search warrant at that address.

It should be noted, an AR-15 long gun along with PMC .223 ammunition, as well as receipts for both items were located in the bedroom and garage of [REDACTED] residence. Furthermore the ammunition located was the same brand as that found at the crime scene.

[REDACTED] refused to speak with me, however, the following statements were made and recorded via.

Jail video:

Jaun- "I'm in here because I set the whole thing up."

[REDACTED] -"I've got 5k at home."

Jaun-"They told me no bondsman because we shot someone."

[REDACTED] -"What the fuck, I did."

Jaun-"Did you get rid of that?"

[REDACTED] -"Fuck no."

Jaun-"Dumbie! We have to tell them it was self-defense."

[REDACTED] -"Either you shoot first or you get shot."

Jaun-"Chris...Tell it to them how we talked about."

[REDACTED] -"I don't talk to cops I aint no snitch!"

Jaun-"I think lopez or louis already told them."

[REDACTED] -"Lopez is dead when I see him I don't give a fuck!"

Det. Josko Wrabec #929

/s/ Det. Josko Wrabec

Signature

The Court Finds Probable Cause:

Judge

