

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

1616-CR00364

Police# 15-090172

Pros# 095429674

OCN# W0007619

INDICTMENT

THE STATE OF MISSOURI,

**IN THE CIRCUIT COURT OF
JACKSON COUNTY, MISSOURI
AT KANSAS CITY, TERM 2016,
IN DIVISION NUMBER 6 THEREOF
DESIGNATED BY THE RULES
OF SAID COURT AS CRIMINAL
DIVISION A.**

vs.

**Jimmie L. Verge
2017 E. Linwood Blvd. #209
Kansas City, MO 64109
DOB: 09/30/1994; Race/Sex: B/M
SS# [REDACTED]**

Defendant.

Count I. Robbery 1st Degree (569.020-001Y19791299.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of Section 569.020, 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 December 14, 2015, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others forcibly stole a Glock 19 handgun owned by Fanandous Groves, and in the course thereof the defendant was armed with a deadly weapon.

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 Grand Jurors of the County of Jackson, State of Missouri, charge 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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others 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.

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. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 558.011.1(1), RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, Fanandous Groves was killed by being shot and as a result of the perpetration of the Class A Felony Of Robbery in the First Degree under Section 569.020, RSMo committed by the defendant, either acting alone or purposefully in concert with others, on or about December 14, 2015, in the County of Jackson, State of Missouri.

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 IV. Armed Criminal Action (571.015-001Y19755299.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Murder in the Second Degree charged in Count Three, 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 V. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 558.011.1(1), RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, Gerrod Woods was killed by being shot and as a result of the perpetration of the Class A Felony Of Robbery in the First Degree under Section 569.020, RSMo committed by the defendant, either acting alone or purposefully in concert with others, on or about December 14, 2015, in the County of Jackson, State of Missouri.

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 VI. Armed Criminal Action (571.015-001Y19755299.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count Five, 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 VII. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841399.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 14, 2015, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others shot [REDACTED] twice, and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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 VIII. Armed Criminal Action (571.015-001Y19755299.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge 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 December 14, 2015, in the county of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Assault in the First Degree charged in Count Seven, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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 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.

Wherefore this Indictment supersedes any complaint previously filed in the Associate Circuit Court.

TRUE BILL

FOREPERSON

**JEAN PETERS BAKER
PROSECUTING ATTORNEY
FOR THE COUNTY OF JACKSON,
STATE OF MISSOURI, by**

Received this _____ day of _____, 2016.

Bail set at \$

WARRANT / SUMMONS TO ISSUE

CIRCUIT COURT JUDGE

WITNESSES:

PO Ryan J. Arnold, 1125 Locust, Kansas City, MO 64106

PO Adrian J. Campbell, 1125 Locust, Kansas City, MO 64106

DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106

[REDACTED]
Fanandous B. Groves (deceased)

DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106

DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106

DET Cristin Stammmer, 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

Gerrod Woods (deceased)

PROBABLE CAUSE STATEMENT FORM

Date: 02-03-2016

CRN: 15-90172

I, Detective Cristin Stammler #5312 (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 December 14, 2015, at 7300 Block Wabash Avenue in (Date) (Address)

Kansas City, Jackson Missouri Jimmie L. Verge (County) (Name of Offender(s))

B/M, 09-30-1994, SS [redacted] committed one or more criminal offense(s). (Description of Identity)

- Murder 2
Rob 1
ACA

The facts supporting this belief are as follows:

- 1. I am a Detective with the Kansas City, Missouri Police Department, and have been a sworn law enforcement officer since 2001. I am currently assigned to the Homicide Unit and conduct death investigations. Since being assigned to the Homicide Unit, I have been involved in the investigation of more than fifty (50) homicides.
2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

- 3. On December 14, 2015 at 9:13 p.m., Kansas City, Missouri Police Officers were dispatched to 73rd Street and Wabash Avenue in Kansas City, Jackson County, Missouri on a reported sound of shots. Upon arrival, Officers discovered a deceased male (later identified as Gerrod Woods) in the middle of the 7300 block of Wabash Avenue. Further investigation revealed two additional victims (Kameron Gines and Fanandous "DJ" Groves) were self-transported to a local hospital where Groves died. All three victims suffered apparent gunshot wounds. Both deaths were ruled homicide by the Jackson County Medical Examiner.
4. Gines told Detectives on the day of the murder, he received a phone call from a person he knew as "A-1" asking him for a ride to go purchase marijuana. Gines has sold marijuana to A-1 in the past and also provided transportation for him to go purchase marijuana. Gines has known A-1 for over five (5) years and knew his first name to be Anthony.
5. Gines stated earlier in the day he sold marijuana to Gerrod Woods. Gines stated Woods and A-1 are cousins.
6. Gines stated DJ went with him to pick up A-1 because he did not trust A-1. Gines knew A-1 and the people he hung out with had committed robberies and shootings in the past. Gines did not believe A-1 would do anything to him because of the length of time they had known each other.
7. Gines and DJ drove to an apartment complex off of 87th Street. Gines said the apartment was where A-1's mother stayed; however, he always saw A-1 over there. Upon arrival to the apartment, Gines saw A-1, Woods, Ricky, and Ricky's brother. Gines said they were all acting strange but eventually, A-1 and Woods got into the vehicle to get the marijuana.
8. Gines said before they left, he saw Ricky's brother sitting in the driver seat of a vehicle and Ricky appeared to be looking for \$10. Gines said the vehicle was tan/black and he believed it was a Buick Rendezvous.

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9. Gines was the driver, DJ was in the front passenger seat, Woods was seated behind DJ, and A-1 was seated behind Gines. A-1 directed Gines to drive to 73rd Street/Wabash Avenue in Kansas City, Jackson County Missouri.

10. As they were driving, Gines noticed a vehicle following them. When they reached the area of 75th Street/Wabash Avenue, he took a quick turn and announced to the others they were being followed. A-1 looked back and told Gines not to worry, it was just Ricky. A-1 told Gines Ricky must have found his \$10 to purchase some marijuana. Gines said as he looked back, it appeared Ricky's brother was driving and Ricky was in the passenger seat.

11. Gines relaxed about being followed and continued to 73rd Street/Wabash. As Gines turned south on Wabash Avenue from 73rd Street, A-1 was on the phone with someone. A-1 told the person they would be on the right side and asked, "Is this you comin'?" Gines observed a black male walking from the east side of the street to the west side in front on his vehicle. The person was on a cell phone and had one hand on his waist area, giving Gines the impression he was "clutching" a gun.

12. Gines recognized the person walking across the street as "Jimmie". Gines knew Jimmie as A-1's cousin. Gines said everything happened so fast. As he stopped the vehicle, the Rendezvous stopped behind them. Woods grabbed DJ around the neck and said, "Pussy, give me that Glock." Gines said DJ had a Glock 19 pistol with a 15-round clip on his person. Gines saw DJ reach for his gun. He then turned to the left to see what A-1 was doing. As he turned, he was shot in the face by A-1. Gines ducked his head between his knees and heard multiple rounds being fired. Gines opened the door and ran to the east. As he crossed the street he looked back and saw Jimmie and possibly A-1 standing on the passenger side of the vehicle. After fleeing between houses, Gines realized he was shot in the face and in the back.

13. Gines came back to the vehicle and found Woods and DJ on the ground outside the passenger side of the vehicle. Woods appeared dead to Gines. Gines loaded DJ into the vehicle and drove to a local hospital.

14. Based upon an examination of the vehicle, evidence of shots being fired inside the vehicle four (4) spent 9mm shell casings and holes in the roof were discovered. There was also evidence of at least ten (10) rounds being fired into the vehicle from the passenger side. There were fifteen (15) spent 9mm shell casings found outside the passenger side of the vehicle. Based upon evidence inside the vehicle, more than four (4) rounds were likely fired inside the vehicle of unknown caliber by an unknown firearm.

15. The only person Gines saw standing outside the vehicle when the shooting began was Jimmie. When asked if Ricky or his brother could have gotten out of the Rendezvous and over to the side of the vehicle before the shooting began he said they would have had to have been really fast because the shooting started almost immediately after the vehicles stopped.

16. No guns were found at the crime scene. DJ's brother, Joshua Como told Detectives DJ's gun was purchased in DJ's name and it was a Glock 19, Serial # YTB402. The gun was entered into NCIC as a gun stolen during a homicide.

17. Two (2) cell phones were located at the crime scene. One of the cell phones was found on Woods' person. The other was found on the street near broken glass. Gines stated the phone found at the scene was his.

18. A search of Gines' phone is consistent with his statement about being in contact with Woods earlier in the day and having contact with A-1 prior to the homicide. The last contact on Gines' phone was with A-1 at the phone number 816-838-1873.

19. A search of Woods' phone showed a contact saved for "Jimmie" at 816-469-2490. I ran the phone number through Tiburon and the only response was to Jimmie Verge.

20. Gines believed he and DJ were set up to be robbed. He said looking back there were several red flags about what happened but he ignored them because of how long he had known them. Gines said recently they were calling him 2-3 times a day for weed. He thought it was strange because he was not their normal weed guy. Gines said about 2 years ago, A-1 asked him on the sly about robbing DJ of his Glock. Gines told A-1, "No." It came up during a conversation about potential robberies A-1 might commit. Gines said 2-3 days before the murder, Ricky asked him

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about getting DJ's Glock. Gines said they were over at A-1's mother's apartment. It was Gines, Ricky, Woods, A-1, A-1's girlfriend, and DJ.

21. Gines said he hadn't seen Jimmie in a year since selling him a bag a weed, but had known him since middle school. When he saw Jimmie walking across the street, he thought, "Jimmie ain't got no weed, Jimmie ain't got no money. A-1 ain't pickin' up no weed from Jimmie. The Jimmie I know doesn't keep ounces of weed. The Jimmie I know is a Jackboy. Jimmie waits around for someone to call him to go rob someone. If you don't want to rob someone directly, you call Jimmie and split it."

22. Gines was shown photo lineups of the above suspects. Gines identified Anthony Murphy (b/m, 03-10-1995) as the person he knew as "A-1" and the person who shot him in the face.

23. Gines identified Jimmie Verge (b/m, 09-30-94) as the person who walked up and was standing on the passenger side of the vehicle when Woods grabbed DJ and Murphy shot him in the face.

24. Gines identified Richard "Ricky" Brown (b/m, 08-12-94) as the person in the passenger seat of the Rendezvous and who, 2-3 days before the murder, asked him about getting DJ's gun.

25. Gines identified Jeremy Lewis (b/m, 03-27-92) as the person driving the Rendezvous.

26. Gines said he was friends on Facebook with Brown, but he deactivated his page the night of the murder. Gines said Ricky reactivated his page a few days after the murder. Gines showed me Ricky's Facebook page on his phone. It was "Kulotsof.smoke".

27. Gines said he was friends on Facebook with Murphy. He said the page was "bear.facegang". Gines said Murphy posted on Facebook about having DJ's Glock. He showed a post from January 7, 2016 at 12:44 pm. The post said they were "in the cuts with this neena" and it was a "black bitch". Gines said the post was slang Murphy was using to say he had DJ's Glock 9mm. I located Murphy's Facebook page; however, the post was not visible to public viewers.

28. Gines said Verge's Facebook page was "Shoe Go Get'em". I went to Facebook and found the page was "john.major.73700". A search of the public area of his Facebook page showed he was friends with bear.facegang and kulotsof.smoke.

29. Court ordered phone records were received for Jimmie's phone (816-469-2490). Jimmie's phone records showed his phone was accessing the cell tower closest to the crime scene at the time of the homicide.

30. On 01-27-16, Ricky Brown was questioned about the homicides. Brown spent the day of the murder with Woods, Jeremy Lewis, and "A-1" at an apartment off 87th Street. Later in the day, "Kam" and "DJ" came over. Brown said they seemed to be friends with "A-1". Brown said Woods told him he and "A-1" were going to trade guns with DJ. Brown knew the phrase "trade guns" to mean they were planning to rob DJ of his gun.

31. Brown said Kam drove DJ, Woods, and "A-1" to Wabash. Kam was driving, DJ was in the front passenger seat, Woods was in the rear passenger seat, and "A-1" was seated behind Kam. Brown was a passenger in the vehicle following them to Wabash. Brown said as both vehicles stopped, he saw "Jimmie" walk across the street and stand outside Woods' window. Brown saw Woods grab DJ and heard 1 or 2 shots inside the vehicle. He then saw "Jimmie" fire several rounds into the passenger side of the vehicle. Brown said as the vehicle he was in fled, he saw Kam running from his vehicle across the street eastbound and "A-1" exit the vehicle and walk to the back of the vehicle.

32. Brown was shown a photo lineup of Murphy and positively identified him as the person he knew as "A-1" and was seated behind Kam.

33. Brown was shown a photo lineup of Verge. Brown pointed to Verge (in position #4) and said he looked like Jimmie but the dreads were a different length.

34. On 01-27-16, Murphy was arrested inside his residence while serving a search warrant. During a search of the residence a Glock 19 handgun was located along with 9mm live rounds. A phone was found next to Murphy when

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he was arrested. The phone number was 816-838-1873 (the same phone used to communicate with Gines the night of the murder).

35. During questioning, Murphy denied any involvement in the murders. He was shown single photos of Woods, Gines, Groves, Verge, Brown, and Lewis. Murphy identified Woods as his cousin but denied knowing any of the other involved parties.

36. On 02-02-16, Verge was arrested at his aunt's residence, located at 7431 Wabash Avenue. During a search of the residence a 9mm handgun was located along with 9mm live rounds. Verge's aunt stated earlier in the day she saw him with a handgun and he told her about being wanted for questioning in the double homicide in December. She asked him if he did it. Verge told her he didn't do anything but "a guy with him killed him."

37. During questioning, Verge denied any involvement in the murders. He was shown single photos of Woods, Murphy, Brown, Lewis, Gines, and Groves. Verge identified Woods but had not seen him for a few months. He identified Murphy as "A-1" and said they grew up together but had not seen him since November. He identified Brown but said he hadn't seen him in a while. Verge identified Lewis only as Brown's cousin. He said he did not know Gines or Groves.

Printed Name Detective Cristin Stammler #5312 Signature Det Stammler #5312

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

Judge

Circuit Court of _____ County, State of Missouri.