

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-009056
PROSECUTOR NO. :	095442342

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JOHN D. JEFFRIES)	
AKA: JOHN D. JEFFRIES)	
6109 Willow,)	CASE NO. 1716-CR
Raytown, MO - 64133)	DIVISION
DOB: 04/24/1993)	
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 November 9, 2017, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Clinton Peckman caused the death of Clinton Peckman by shooting him.

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 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 November 9, 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

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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. Robbery - 1st Degree (570.023-001Y20171205.0)

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 November 9, 2017, in the County of Jackson, State of Missouri, the defendant forcibly stole a ford edge in the possession of [REDACTED], and in the course thereof 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 IV. 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 November 9, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 3, 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.

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.

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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/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

██
██

DET Kenneth Keating , 1100 SW Smith, Blue Springs, MO - 64015
Clinton Peckman , 18020 W. 319th St. Paola, Paola, KS - 66071

PROBABLE CAUSE STATEMENT

Date: November 10, 2017

Police Complaint Number: 2017-09056

I, Detective Kenneth Keating, a Police Officer for the City of Blue Springs, Missouri, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on **11-09-2017** at approximately 1117 hours at **1512 NW Woods Chapel Road**, Blue Springs, Jackson County, Missouri 64015, **John D. Jefferies W/M 04-24-1993** committed one or more criminal offense(s).

2. **The facts supporting this belief are as follows:**

On 11-09-2017 at approximately 0712 hours, Independence Police were dispatched to a reported shots fired in the area of 716 N Sunset. An eye witness stated the heard about five gunshots and ran to his window to see a white male jump into the passenger side of a newer model Ford Explorer and leave the area. The victim did not witness the incident. At approximately 1022 hours, the victim, identified as [REDACTED], called Blue Springs Police Department to advise she had discovered who damaged her car earlier in the day in Independence. [REDACTED] identified the suspect as Mr. John Jefferies and informed dispatch Mr. Jefferies was in a stolen vehicle at the Autumn Place apartments in Blue Springs and possibly armed with a gun. At 1050 hours, [REDACTED] called back to inform officers that Mr. Jefferies was no longer at Autumn Place apartments and now was across the street in one of the Kingsridge apartments. Blue Springs Officers were dispatched to the area to search for Mr. Jefferies and/or the stolen vehicle with negative results.

At approximately 1117 hours, dispatch was advised of a shooting at 1512 NW Woods Chapel. The caller advised a man had been shot in the parking lot of the Bethlehem Café. The caller stated there were two white men in a white mini-van with Kansas plates in the parking lot and one guy shot the other guy then took off. Officer Brandon Shrout was quick on scene and found the victim, identified as Clinton Peckman, to be laying on his back with no signs of life and did not appear to be breathing. Life saving measures were conducted on Mr. Peckman. Officer Shrout was advised the suspect ran south of the business when Officer Shrout informed officers on his radio he heard shots coming from the south of his location. Suspect description was a white male with short brown hair wearing a black and gray jacket and jeans.

Officer Will Gibson and Office Phil Leslie were responding in the area when Officer Leslie advised over the police radio he observed the suspect, matching that description, running east from 1236 NW Woods Chapel Rd (KFC/Taco Bell). Officer Gibson observed the suspect run towards 1222 NW Woods Chapel Rd where Officer Justin

Wyrick apprehended the suspect, identified as Mr. Jefferies. Officers asked Mr. Jefferies for public safety concerns where the gun was and Mr. Jefferies advised he “gave it to a friend” and refused to answer any further questions. Detectives later attempted to speak with Mr. Jefferies about this incident and he invoked his Miranda rights and asked to speak to a lawyer to which the interview ceased.

Officer Leslie and Officer Gibson were advised that at KFC/Taco Bell that Mr. Jefferies, had attempted to steal a red 2016 Ford Edge. The owner of the Ford Edge, ██████████, advised they were leaving KFC and walking to their car when his wife, ██████████, got into the passenger seat. ██████████ advised the suspect came up from behind him and demanded his keys. ██████████ advised he gave the suspect his key fob and the suspect got into the driver side of the car and pointed a gun at ██████████ and told her “I need your car.” ██████████ stated he grabbed the suspects arm and brought the arm up towards the ceiling, away from his wife, when the gun went off in the ceiling of the car. ██████████ and ██████████ stated they went inside the restaurant where they observed the suspect put the car in reverse, strike the curb, almost strike the building before the car became inoperable. At that point, Mr. and ██████████ advised the suspect got frustrated and got out of the car and took off running east from the building. Witnesses at KFC collectively stated the suspect was a young white male, approximately 5’8, slim with a beard. A cell phone presumed to be the suspects was located on the sidewalk a few feet from the Ford Edge and a black Hi point 45 caliber handgun was located on the east side of the building between the building and the dumpster. The slide to the gun was locked back and discovered to be empty/out of ammunition. Detective Keating later asked Ms. Lacey if Mr. Jefferies owned any weapons. Ms. Lacey told Detective Keating Mr. Jefferies owns a gun and when Detective Keating asked her what kind of gun, Ms. Lacey replied a “45 caliber Hi point.”

Mr. Peckman was transported to Centerpoint hospital where he never regained consciousness and was pronounced dead. Detective Kevin Lange advised he observed a single gunshot wound with an entrance wound in the chest and exit wound out the back. Detective Lange advised the emergency room floor was covered in copious amounts of blood as was the victim’s shirt. In the Café parking lot, just outside the driver side door were apparent blood drops and it lead to the rear of the vehicle where there was a pool of apparent blood suggesting Mr. Peckman did not go very far after exiting the vehicle before he collapsed. Nearby surveillance video at Waffle House captured Mr. Peckman’s van driving up to the front door of the Café and then pull into a parking space. A short time later the passenger door opens and a white male wearing what appears to be a black and white shirt and jeans runs south behind Waffle House towards the KFC/Taco Bell. The driver side door opens and you observe witnesses running towards the driver side of the van. A Waffle House customer/witness, ██████████, advised she observed a white male wearing a grey and black sweatshirt wrestling an older man in a white van in the parking lot of the Café. A short time later, ██████████ heard a gunshot and a white male ran south of the parking lot. A short time later she heard a second gunshot.

Detective Keating would later discover, Mr. Peckman lived in Kansas and traveled here to Blue Springs where he was working at Autumn Place Apartments. Mr. Peckman was working with an employee when he asked for the keys to the work van and was heading to either the gas station and/or Home Depot. The exact moment when Mr. Peckman and Mr. Jefferies paths crossed is unknown at this time and it is not believed they knew each other prior to this incident.

3. I believe the defendant:

- a. A danger to the community or to any other person because: of the violent nature of the above charges and his lengthy criminal history.**

Based on the information and evidence as outlined above Detective Keating feels probable cause exists to believe that the suspect **John D. Jefferies** committed the crime of **Murder 2nd Degree, Robbery 1st Degree (x2) and Armed Criminal Action (x3)** and that the offense occurred within the jurisdiction of the Circuit Court of Jackson County MO.

The facts contained herein are true.

Detective Kenneth Keating 1984
Blue Springs Missouri Police Department

/s/ Kenneth Keating
Signature