


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

<b>POLICE NO. :</b>	18-045990
<b>PROSECUTOR NO. :</b>	095446154
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JAMES E. REED</b>	)	
<b>5251 Franklin</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64130</b>	)	<b>DIVISION</b>
<b>DOB: 03/09/1963</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2nd Degree (565.021-001Y19840904.0)**

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 June 17, 2018, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Jamie L. Abernathy, caused the death of Jamie L. Abernathy by striking her.

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. Domestic Assault 1st Degree - 1st Offense (565.072-002Y19991399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.072, RSMo, committed the **class B felony of domestic assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 17, 2018, in the County of Jackson, State of Missouri, the defendant put his foot on Anita N. Reed's stomach and

**State vs. James E. Reed**

struck her in the head, and such conduct was a substantial step toward the commission of the offense of domestic assault in the first degree of [REDACTED], and was done for the purpose of committing such assault, and [REDACTED] and defendant were family or household members in that [REDACTED] and the defendant were persons who were related by blood.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) 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/ Kristiane N. Bryant*  
Kristiane N. Bryant (#69524)  
Assistant Prosecuting Attorney  
415 E. 12th St.  
Floor 7M  
Kansas City, MO 64106  
(816) 881-3597  
KNBryant@jacksongov.org

**WITNESSES:**

1. Jamie L. Abernathy, 5251 Franklin, Kansas City, MO 64130
2. PO Joshua M. Gantt, 1125 Locust, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
5. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106
7. PO Westley Wasmer, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06-18-2018

CRN: 18-45990

I, Detective Tom Hammond #4775 (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 06-17-2018, at 5251 Franklin in (Date) (Address)

Kansas City, Jackson Missouri James E. Reed (County) (Name of Offender(s))

B/M, 03-09-1964 committed one or more criminal offense(s). (Description of Identity)

Murder Assault (Agg) X 2

The facts supporting this belief are as follows:

On 06-17-2018, at approximately 2137 hours, Kansas City Missouri Police Officers were dispatched to 5251 Franklin, Kansas City, Jackson County, Missouri in regard to a disturbance. Upon the officers arrival they observed victim #1, a 58 year old black female named Jamie, slumped over the porch railing of the address. Officers also observed the suspect, James E. Reed, b/m, 03-09-1964, walking in the area and was refusing verbal commands. Due to Reed not complying with verbal commands officers deployed the taser which incapacitated Reed and he was taken into custody.

Officers observed Jamie slumped forward, at the waist, over the front porch railing. Officers observed Jamie to have sputum coming from her mouth and bleeding from her forehead. Officers noted Jamie was unresponsive and observed multiple lacerations on her left arm. Officers placed Jamie on her back and observed swelling to her face and upper lip and also swelling to her neck. Jamie was transported to a local hospital where she died.

Contact was made with victim #2, a 85 year old black female and Reed and victim #1's mother, who stated she was inside the residence with Jamie, Reed and three of her great grandchildren. stated Jamie had accused Reed several times of taking her cigarettes. stated Reed "flipped" and "was knocking and beating her (Jamie) for all she was worth." stated Reed also knocked her to the ground, put his foot on her stomach and punched her on her head with his fist. stated she pled with Reed to stop hitting Jamie and he stated, "I wish the bitch would die." stated Reed hit Jamie "a million" times and stated, "he tried to kill her, he beat her like that on the couch." stated Reed was also throwing items inside the house and using his fists and an item like a stick to strike Jamie. further stated Reed would hit Jamie and leave the room and come back and hit her some more stated this happened 2-3 times.


**PROBABLE CAUSE STATEMENT FORM**

CRN 18-45990

Reed was arrested at the scene. During this time Reed made several spontaneous utterances to officers which include, "She shouldn't have put her hands on me, I told that bitch this is the last time you touch me." "You don't want to push my buttons or else this is going to happen" and "I would cut that bitch's throat if she touches me again." "She stole on me so I beat that bitch's ass" and "pimpin ain't easy." Reed also stated, "I bet she don't do it again." When Reed was placed in the wagon he began screaming, "I'll cut that bitch again, fuck it. You shouldn't have put your hands on me."

Reed was transported to Police Headquarters where he immediately asked for an attorney prior to being advised of his Miranda Rights.

The Jackson County Medical Examiner's Office has ruled this death as a homicide.

Printed Name Det. Tom Hammond #4775 Signature 

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.