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

Police# 09-091425
Prosecutor# 095349214
0916-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Clifford V. Jackson

Kansas City, MO 64123

DOB: ██████████ 1989; Race/Sex: B/M;

SS#

Defendant.

Count I. Murder 2nd Degree (10031990)

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 November 21, 2009, in the County of Jackson, State of Missouri, the defendant acting alone or purposefully in concert with another with the purpose of causing serious physical injury to Wilfredo Melgar caused the death of Wilfredo Melgar by shooting him, and the defendant is further given notice should the State submit Murder in the Second Degree - felony, under Section 565.021.1(2), RSMo, 2000, it will be based on the death of Wilfredo Melgar as the result of the attempted perpetration of the Class A Felony of Robbery in the First Degree, under Section 558.011.1(1) on or about November 21, 2009, in the County of Jackson, State of Missouri.

Count II. Armed Criminal Action (31010990)

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 21, 2009, in the county of Jackson, State of Missouri, the defendant committed the Felony of Murder in the Second Degree charged in Count I, 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.

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STATE OF MISSOURI

vs.

Clifford V. Jackson**Count III. Robbery 1st Degree (12010010)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges 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 November 21, 2009, in the County of Jackson, State of Missouri, the defendant acting alone or purposefully in concert with another forcibly stole US currency and cell phones in the possession of [REDACTED] and [REDACTED] and in the course thereof the defendant was armed with a deadly weapon.

Count IV. Armed Criminal Action (31010990)

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 21, 2009, in the county of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count III, 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 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.

JAMES F. KANATZARProsecuting Attorney
Jackson County, Missouri

by,

Theresa E. Crayon (47238) forTheresa E. Crayon (#41063)
Assistant Prosecuting Attorney
415 East 12th Street Floor 7M
Kansas City, Missouri 64106
(816) 881-3888**WITNESSES:**

DET Everett C. Babcock, 1125 Locust, Kansas City, MO 64106

DET Robert D Guffey, 1125 Locust, Kansas City, MO 64106

Marvin G. Melgar, 4405 St. John, Kansas City, MO 64123

DET David S. Needham, 1125 Locust, Kansas City, MO 64106

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

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PROBABLE CAUSE STATEMENT FORM

CRN: 09-091425

Date: 11/22/2009

I, Detective Darin Penrod, #4288

(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 11/21/2009, at 12th and Bales in
(Date) (Address)

Kansas City, Jackson Missouri Clifford V. Jackson
(County) (Name of Offender(s))

B/M [REDACTED]-1989 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 11-21-09 at 1058 hours officers were dispatched to 3410 E. 12th street, Kansas City, Jackson County, Missouri regarding sound of shots. En-route the call was upgraded to a shooting. At 12th and Bales officers found the victim, an unknown Hispanic male, lying near the sidewalk suffering from gunshot wounds. The victim was transported to a local hospital where he died.

Officers learned that the victim had come from a market located at 3601 E. 12th street, Kansas City, Jackson County, Missouri. At the market witnesses related that two black male suspects had entered the market, one armed with a handgun, and announced a robbery. One suspect had his face covered with a mask, and the other, who was armed with a handgun, was wearing a hooded type jacket. The robbers took cash and two cell phones and Newport cigarettes. They then fled the scene on foot with the victim in pursuit. At approximately 12th and Bales the victim apparently located the suspects and was subsequently shot to death. The victim's brother then further pursued the suspects in his vehicle and saw them enter a door in the back of the apartment building determined to be 3214-3216 E. 11th, Kansas City, Jackson County, Missouri.

The victim's brother borrowed a cell phone and called 911 at which time police officers responded and secured the apartment building. An operation 100 was initiated and tactical officers responded and took over the scene. Subsequently the tactical unit made entry into the basement of 3214-3216 E. 11th and arrested the listed suspects, Clifford V. Jackson, B/M, [REDACTED]-1989, and Travis L. Knott, B/M, [REDACTED]-1990, hiding in the basement. During the arrest officers observed a mask, a hooded jacket, two cell phones, and an unknown amount of U.S. currency. The rest of the apartment building was cleared and no other suspects were discovered.

Detectives obtained a search warrant for the basement of 3214-3216 E. 11th and conducted a search at that location. During the search detectives recovered two cellular telephones, a Halloween mask, a black Carhartt hooded coat, a left handed Wilson's batting glove, a P-38 semi automatic handgun, a pack of Newport cigarettes, and a total of \$83.00 in cash from where the suspects had been located.

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PROBABLE CAUSE STATEMENT FORM

CRN 09-091425

Detectives interrogated Clifford V. Jackson, who stated that on 11-21-2009, at approximately 1000 hours, Travis L. Knott came to his residence and asked him to go with him. They walked together and while walking Knott told Jackson that he wanted to "pull a lick," (do a robbery). Knott told Jackson to just "do what I tell you to do." Knott and Jackson walked to the store at 3801 E. 12th. Knott told Jackson to put on a Halloween mask that Knott had. Jackson put on the mask and the two entered the store. Knott pointed the handgun at the female clerk and told her to give up the money. The clerk opened the door and Jackson grabbed the cash. Knott also had the clerk hand over a pack of Newport cigarettes. Knott then pointed the handgun at the male owner of the store and told him to empty his pockets and give him his cellular telephones. Jackson and Knott then ran from the store to an alley that ran east to west just north of 12th Street. They ran west through the alley and hid on some stairs just west of Bales. At that time they observed the store's owner drive through the alley in a van. After the van passed without seeing them, they observed the victim approaching them, walking west through the alley talking on a cellular telephone. Knott told Jackson, "I'm about to shoot this dude." According to Jackson this was because the individual was on the phone with the police. Jackson told Knott not to do it but Knott stepped out and shot the victim four times. Knott and Jackson ran away but soon the owner of the store came up behind them in the van. Knott shot at the van two times and the van crashed. Knott and Jackson then ran and hid in the basement where they were located by the police.

Detectives Interrogated Travis Knott, who admitted to robbing the store and shooting the victim. Knott's statement was consistent with the statement of Clifford Jackson.

Printed Name Detective Darin Penrod, #4288

Signature



The Court finds probable cause and directs the issuance of a warrant this 22nd day of November, 2009

Judge

Circuit Court of _____ County, State of Missouri.