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# United States District Court

WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

(1) MICHAEL D. MOORE  
[DOB: 12/11/1989],

(2) JAMAHL D. JONES  
[DOB: 01/23/1987],

Defendants.

**COUNT ONE and TWO** - *Both Defendants*

Felon in Possession of a Firearm  
18 U.S.C. §§ 922(g)(1) and 924(a)(2)  
NMT 10 years' imprisonment  
NMT \$250,000 fine  
NMT 3 years' supervised release  
Class C felony

\$100 Mandatory Special Assessment Each Count

**CRIMINAL COMPLAINT**

**Case Number:** 20-MJ-00092-01/02-JTM (LMC)

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT ONE

On or about August 17, 2020, in the Western District of Missouri, the defendant, MICHAEL D. MOORE, knowing he had previously been convicted of a crime punishable by imprisonment for a term excepting one year, knowingly possessed a firearm, to wit: a Smith and Wesson SD9 9mm pistol, bearing Serial Number FYK4174, and the firearm was in and affecting commerce. All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)

COUNT TWO

On or about August 17, 2020, in the Western District of Missouri, the defendants, JAMAHL D. JONES, knowing he had previously been convicted of a crime punishable by imprisonment for a term excepting one year, knowingly possessed a firearm, to wit: a Sadarius 9mm semi-automatic handgun, bearing Serial Number T110270BV58407, and the firearm was in and affecting commerce. All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2)

I further state that I am Detective Brent A. Cartwright of the Kansas City Police Department and that this complaint is based on the following facts:

(See attached Affidavit)

Continued on the attached sheet and made a part hereof: : Yes 9 No.

*Brent A. Cartwright* #362  
Brent A. Cartwright, Detective  
Kansas City Police Department

O Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone or other reliable electronic means on this 18<sup>th</sup> day of August, 2020. Sworn to by telephone

August 18, 2020

12:24 PM, Aug 18, 2020

at

Kansas City, Missouri

City and State

Date

Lajuana M. Counts, United States Magistrate Judge

Name and Title of Judicial Officer

*Lajuana M. Counts*

Signature of Judicial Officer



**AFFIDAVIT**

I, Detective Brent Cartwright, being duly sworn, state under oath that:

1. I am a Detective with the Kansas City, Missouri Police Department (KCMOPD) and have been employed with KCMOPD since January 2007. I have been a detective since December 2012, where I have conducted investigations involving drug and firearm offenses within the Kansas City metropolitan area. I am currently assigned to the Illegal Firearms Squad.
2. During my tenure with KCMOPD, I have been involved in numerous investigations of various individuals in the importation and distribution of controlled substances. I have communicated extensively with other state and federal law enforcement personnel who specialized in illegal firearms investigations. I have also had extensive experience in debriefing participating witnesses, informants, and other persons who have had personal experience and knowledge of the importation and distribution of controlled substances.
3. This affidavit contains information necessary to support probable cause for criminal charges against **Michael MOORE Jr.** and **JAMAHL JONES** for being felons in possession of a firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2). It is not intended to include every fact or matter observed by me or known by law enforcement. The information provided is based on my personal knowledge and observation during the course of this investigation, information conveyed to me by other law enforcement officials, and my review of records, documents, and other physical evidence obtained during the investigation.
4. From my participation in this investigation, as well as from reviewing investigative reports and from discussions with other law enforcement officers, I have learned the following information:
5. On July 1, 2020, at approximately 8:37 p.m., KCMOPD officers were dispatched to the department's south patrol division station in reference to a victim who had walked into the station to report an armed robbery. The victim informed the officers that he was robbed by his brother-in-law and two unknown males near E. 55th Street and Prospect Avenue, Kansas City, Missouri on July 1, 2020, at approximately 5:50 p.m. The victim explained that his brother-in-law, **Michael MOORE Jr.**, is an organizer for the "Honk for Peace" group that typically assembles at the intersections of 35th Street and Prospect Avenue as well as 55th Street and Prospect Avenue. The victim stated **MOORE** invited him to join the assembly at 55th Street and Prospect Avenue. The victim stated he and another victim arrived at the Phillips 66 gas station, located at 5425 Prospect Avenue, and contacted **MOORE** who asked him to drive across the street to the Family Dollar store, located at 5440 Prospect Avenue and meet him. The victim advised that he was seated in the front passenger seat of a white 2004 Chevrolet Impala and another victim was driving. The victim reported that after parking directly in front of the Family Dollar, two unknown black males approached the passenger side door. The victim stated **MOORE** entered the rear passenger seat and put a black compact Taurus .40 firearm to the left side of his head and stated "give

me everything.” The victim stated that when **MOORE** placed the gun to his head one of the other black males outside the vehicle leaned inside the window and began going through the victim’s pockets as **MOORE** did the same. The victim stated the third suspect outside the vehicle made the comment of "he thinks we playin lets cap his ass" while displaying a gun near his right hip. The victim advised that after **MOORE** removed \$407.00 from his pants pocket and grabbed a pink backpack containing a black .40 caliber firearm all of the suspects left in an unknown direction.

6. On July 21, 2020, at 3:19 p.m., KCMOPD officers were notified of an armed robbery that occurred at a Conoco gas station, located at 4516 E. 39th Street Kansas City, Missouri. Upon arrival, officers made contact with the victim who stated that he had stopped at the store to withdraw money and buy oil for his vehicle. When he pulled in, he observed a blue, 2006 BMW X3 SUV, parked in the parking lot with three occupants inside. The victim went inside of the business and an unknown black male suspect followed him in. The victim went to the ATM and withdrew cash to buy oil. As he walked up to the counter he heard the unknown black male talking about the sale of Glock handguns with the clerk. After paying for the oil, the victim went outside to his vehicle, lifted the hood and began to add the oil. While adding the oil, a second black male wearing white shirt and blue shorts, later identified as **MOORE**, approached him with a gun and stated “empty your pockets.” The victim initially thought he was joking and ignored him, and then observed the unknown male from the store approach him with a gun, who then stated “empty you mother fucking pockets.” The victim handed over his wallet and the unknown male and **MOORE** demanded he empty all of his pockets. **MOORE** and the other black male stole approximately \$140.00 and fled the scene.

7. On July 29, 2020, still photos taken from the surveillance video of the robbery were distributed throughout KCMOPD. The photos were of the suspect vehicle, **MOORE**, and the additional suspect. On July 29, 2020, at approximately 5:45 p.m., KCMOPD officers located a blue BMW SUV matching the description of the suspect vehicle at E. 93rd Street and Indiana Avenue, Kansas City, Missouri. The officers observed the suspect vehicle to have a fake temporary tag and conducted a traffic stop at 5501 E. Bannister Road, Kansas City, Missouri. The driver was identified to be **JAMAHL JONES** and a computer records check revealed him to have multiple city warrants. Inside of the vehicle, officers observed in plain view a MasterPiece Arms 9mm pistol with a high capacity extended magazine bearing serial number FX13875 and approximately 146 grams of a green leafy substance packaged in multiple individual baggies in the driver’s floorboard. An inventory search of the vehicle also revealed an additional 10.4 grams of THC resin. A criminal history check revealed that **JONES** was a convicted felon and he was taken into custody. The green leafy substance and THC resin were field tested which resulted in a positive reaction for the presence of THC, the active ingredient in marijuana.

8. On July 29, 2020, at 7:50 p.m., investigators contacted **JONES** and advised of his *Miranda* rights. **JONES** agreed to provide a statement. **JONES** stated that he is the owner of the vehicle, blue BMW X3, associated with the robbery. He owned the vehicle for approximately two months, but on occasion lends it to friends. **JONES** admitted to possessing the firearm in his vehicle and knew that he was a convicted felon and prohibited from possessing a firearm. **JONES** advised he also knew why he was stopped and knew he was taking a risk in making the "run," which referred to the delivery of marijuana for money,



because he was notified his vehicle had been involved in other criminal incidents. **JONES** further stated that **MOORE** used the vehicle as a mode of transportation during a non-fatal shooting where **MOORE** shot a victim. **JONES** was then released pending further investigation.

9. On August 3, 2020, **MOORE** was charged with Robbery in the First Degree and Armed Criminal Action in the Circuit Court of Jackson County Missouri. A warrant was issued for his arrest which is currently under seal.

10. On August 17, 2020, at approximately 12:00 p.m., KCMOPD detectives began surveillance at 2100 E 33rd Street, Kansas City, Missouri for **MOORE** in an effort to arrest him for the warrant related to the robbery charge. A detective observed **MOORE** exit the blue BMW SUV and carrying a firearm in his hand. **MOORE** then placed the firearm in his waistband and walked away from the vehicle and out of sight. Detectives then observed **MOORE** re-enter the blue BMW SUV. The vehicle then traveled to a parking lot near 2310 E. 9th Street, Kansas City, Missouri where it backed into a parking space. KCMOPD officers then approached **MOORE** to arrest him. Upon seeing law enforcement, **MOORE** exited the vehicle and took cover behind the vehicle and drew his firearm from his waistband and pointed it directly at two KCMOPD officers, who were in police uniforms. As additional KCMOPD vehicles entered the parking lot, **MOORE** fled westbound where he was observed throwing the handgun and holster along an apartment wall and laid on the ground approximately 15 feet from the firearm where he was taken into custody. The firearm that **MOORE** threw was identified as a Smith and Wesson SD9 9mm pistol bearing serial number FYK4174. The firearm was determined to be stolen out of Kansas City, Missouri. The firearm was loaded with sixteen live rounds in the high capacity magazine and one live round in the chamber.

11. **JONES** was also in the blue BMW SUV with **MOORE**. KCMOPD officers located **JONES** near an open door of the vehicle. Upon contacting **JONES** officers smelled an odor of marijuana emitting from the vehicle. **JONES** spontaneously uttered that he had marijuana in his possession. Officers located approximately 20.91 grams of a green leafy substance in **JONES**' left front shorts pocket. **JONES** also volunteered information that there was a firearm inside of his car. **JONES** stated that it was his girlfriend's firearm, but he was aware of it and in possession of it. An inventory search incident of the vehicle revealed a firearm on the rear driver's floorboard. That firearm was identified as a Sadarius 9mm semi-automatic handgun, bearing serial number T110220BV58407, which contained a magazine and 16 live rounds of ammunition with a live round in the chamber. Officers further located a working digital scale in the center cup holder, a box containing 18 live rounds of 9mm ammunition, a 9mm handgun magazine in the driver's front door pocket, and a small safe inside the vehicle. Inside of the safe was a black 9mm handgun magazine and approximately 123 grams of a green leafy substance inside. The green leafy substances, located on **JONES**'s person and in the safe, were field tested which revealed a positive result for the presence of THC, the active ingredient in marijuana.

12. On August 17, 2020, at approximately 1:47 p.m., **JONES** was interviewed by investigators. **JONES** was read his *Miranda* Warning and stated he understood his rights and agreed to speak with investigators. **JONES** admitted that he was a convicted felon and

prohibited from possessing a firearm. He further admitted to possessing the Sadarius firearm located inside his vehicle. **JONES** stated he was with his girlfriend when she purchased the firearm and he had it in his possession for protection. **JONES** admitted to possession of the marijuana located in his pocket and inside the safe.

13. On August 17, 2020, at approximately 1:49 p.m., **MOORE** was interviewed by another set of investigators. **MOORE** was read his *Miranda* Warning and stated he understood his rights and agreed to speak with investigators. **MOORE** advised there are a lot of people trying to kill him, so while he is in Kansas City he will always be armed, felon or not. **MOORE** stated that he was just released from prison after spending ten years in prison for armed robbery. **MOORE** admitted to being present during a robbery, but stated he kept an associate from murdering the victim of the robbery and that was the only thing he did. Prior to his arrest, **MOORE** advised he initially pulled his handgun out on the vehicle that later turned out to be a police vehicle as he thought it was someone trying to kill him. Upon realizing it was the police he fled on foot.

14. A review of the criminal history of **MOORE** revealed the following felony convictions:

- On or about May 19, 2009, in the Circuit Court of Jackson County, Missouri for Robbery 1st Degree in case number 0916CR01426-01 with a sentence of ten years.

15. A review of the criminal history of **JONES** revealed the following felony convictions:

- On or about June 22, 2005, for Burglary 1st Degree and Theft in the Circuit Court of Boone County, Missouri in case number 05BACR01286-01;
- On or about July 18, 2005, for Burglary 2nd Degree in the Circuit Court of Boone County, Missouri in case number 05BACR02517-01;
- On or about June 30, 2006, for Tampering in 1st Degree and Possession of a Controlled Substance in the Circuit Court of Jackson County, Missouri in case number 0616CR00719-01;
- On or about September 9, 2013, for Tampering in 1st Degree in the Circuit Court of Boone County, Missouri in case number 11BACR00710-01.

16. Special Agent Jeffrey Brock with the Bureau of Alcohol, Tobacco, Firearms, and Explosives has concluded that the firearms listed below were not manufactured in the State of Missouri and thus affected interstate commerce.

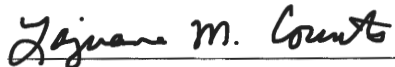
- Smith and Wesson SD9 9mm pistol bearing serial number FYK4174 which was possessed by **MOORE**.
- Sadarius 9mm semi-automatic handgun bearing serial number T110220BV58407 possessed by **JONES**.

The aforementioned violations occurred in the Western District of Missouri.



DETECTIVE BRENT CARTWRIGHT, #5362  
Kansas City Missouri Police Department  
Illegal Firearms Squad

○ Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone or other reliable electronic means on this 18<sup>th</sup> day of August, 2020. **Sworn to by telephone**  
**12:23 PM, Aug 18, 2020**



HONORABLE LAJUANA M. COUNTS  
United States Magistrate Judge  
Western District of Missouri

