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**United States District Court**  
**WESTERN DISTRICT OF MISSOURI**  
**WESTERN DIVISION**

UNITED STATES OF AMERICA

v.

JAMERL M. WORTHAM,  
[DOB: 08/22/1985]

**COUNT ONE: Carjacking**

18 U.S.C. § 2119 and 18 U.S.C. § 2  
NMT 15 Years Imprisonment  
NMT \$250,000 Fine  
NMT 3 Years Supervised Release  
Class C Felony

**COUNT TWO: Use of a Short-Barreled Shotgun  
During and in Relation to Carjacking**

18 U.S.C. §§ 924(c)(1)(A), (B)(i), and 18 U.S.C. § 2  
NLT 10 Years Imprisonment (Consecutive)  
NMT Life Imprisonment (Consecutive)  
NMT \$250,000 Fine  
NMT 5 Years Supervised Release  
Class A Felony

**COUNT THREE: Kidnapping**

18 U.S.C. § 1201(a)(1) and 18 U.S.C. § 2  
NMT Life Imprisonment  
NMT \$250,000.00 Fine  
NMT 5 Years Supervised Release  
Class A Felony

**COUNT FOUR: Use of a Short-Barreled Shotgun  
During and in Relation to Kidnapping**

18 U.S.C. §§ 924(c)(1)(A), (B)(i), and 18 U.S.C. § 2  
NLT 10 Years Imprisonment (Consecutive)  
NMT Life Imprisonment (Consecutive)  
NMT \$250,000 Fine  
NMT 5 Years Supervised Release  
Class A Felony

\$100 Mandatory Special Assessment Each Count

**CRIMINAL COMPLAINT**

**Case Number: 16-MJ-00086-REL-01**

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 April 9, 2016, in the Western District of Missouri, the defendant, JAMERL M. WORTHAM, and others, aiding and abetting each other, with the intent to cause death or serious bodily harm, took a motor

vehicle, to wit: a red 2009 Toyota Camry bearing Kansas license plate 452FBF, that had been transported in interstate commerce, from the person of Y.C., by force and violence, or intimidation, contrary to the provisions of Title 18, United States Code, Section 2119 and Title 18, United States Code, Section 2.

**COUNT TWO**

On or about April 9, 2016, in the Western District of Missouri, the defendant, JAMERL M. WORTHAM, and others, aiding and abetting each other, did knowingly use a short-barreled shotgun, to wit: a Coast To Coast Master-Mag, Model CC660, 20-gauge shotgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, carjacking, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A) and (B)(i), and Title 18, United States Code, Section 2.

**COUNT THREE**

On or about April 9, 2016, in the Western District of Missouri, the defendant, JAMERL M. WORTHAM, and others, aiding and abetting each other, did unlawfully and willfully seize, confine, kidnap, abduct and carry away and hold for ransom, reward, or otherwise rob, assault, or harm T.J., Y.C., and M.M., and in committing and in furtherance of the kidnapping, traveled in interstate commerce from Missouri to Kansas, contrary to the provisions of Title 18, United States Code, Section 1201(a)(1) and Title 18, United States Code, Section 2.

**COUNT FOUR**

On or about April 9, 2016, in the Western District of Missouri, the defendant, JAMERL M. WORTHAM, and others, aiding and abetting each other, did knowingly use a short-barreled shotgun, to wit: a Coast To Coast Master-Mag, Model CC660, 20-gauge shotgun, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, kidnapping, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A) and (B)(i), and Title 18, United States Code, Section 2.

I further state that I am Special Agent Jason R. Ramsey of the Federal Bureau of Investigations and that this complaint is based on the following facts:

(See attached Affidavit).

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



\_\_\_\_\_  
JASON R. RAMSEY, Special Agent  
Federal Bureau of Investigations

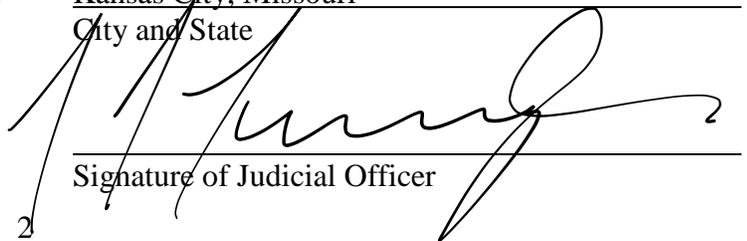
Sworn to before me and subscribed in my presence,

**April 11, 2016**

\_\_\_\_\_  
Date

at Kansas City, Missouri  
City and State

HONORABLE JOHN T. MAUGHMER  
\_\_\_\_\_  
United States Magistrate Judge  
Name and Title of Judicial Officer

  
\_\_\_\_\_  
Signature of Judicial Officer

STATE OF MISSOURI     )  
                                  ) ss.  
COUNTY OF JACKSON    )

Case No. 16-MJ-00086-REL-01

**AFFIDAVIT**

I, Jason R. Ramsey, being duly sworn, depose and state:

1. I have been a Special Agent of the FBI for approximately eight years, and I am currently assigned to the Kansas City office of the FBI. I received basic training regarding the investigation of Hobbs Act robberies, violent crime, carjacking and kidnapping at the FBI Academy located in Quantico, Virginia. Prior to becoming Federal Agent, I was a law enforcement Officer for the City of Shawnee Kansas for approximately six years working narcotics violations and violent crime. I am currently assigned to investigate criminal enterprises in the greater Kansas City metropolitan area, with a focus on violent gangs, and have been since October, 2014. I was previously assigned to the Houston office of the FBI from approximately April 2009 to January 2010, where I conducted gang and narcotics investigations, violent crime, bank robberies, and white collar crime (including public corruption) investigations. Subsequent to the Houston posting I was assigned to the New York office of the FBI from approximately January 2010 to August 2012, where I conducted counter intelligence investigations. I have been involved in numerous search warrants, informant debriefings, controlled drug buys, wiretaps, interviews, and arrests.
2. The information contained in this affidavit is based upon my investigation, along with information provided to me by the Kansas City, Missouri Police Department, Kansas City, Kansas Police Department and other Federal Agencies. Based upon these sources of information, I believe the following to be true and correct:
3. On Saturday, April 09, 2016, Kansas City, Missouri police officers were dispatched to the lobby of the Central Patrol Division, Kansas City, Missouri Police Department on an armed robbery. Once there, they met with the victim, T.J. T.J. stated that on April 9, 2016, at around 2:00 a.m., she and her roommate, Y.C., had gotten off work and were going to deposit their paychecks at the Bank of America ATM located at 112 E. Missouri, Kansas City, Western District of Missouri. They drove to the ATM in Y.C.'s red 2009 Toyota Camry bearing Kansas license plate 452FBF, Vehicle Identification Number (VIN) 4T4BE46KX9R129493. The Camry was not manufactured in the state of Missouri and, thus, had been transported interstate commerce.
4. When they pulled up to the ATM, a vehicle pulled in behind them and two black males (UNSUB #1 and UNSUB #2) exited the car and approached the Toyota Camry. UNSUB #1 walked up to the driver's side, grabbed Y.C. and demanded her money while UNSUB#2 approached the passenger side door and pointed a shotgun at T.J. UNSUB#2 forced T.J. into the backseat of the Camry where UNSUB#2 also entered

- into the vehicle. UNSUB#1 forced YC into the passenger seat of the Camry as he got into the driver's seat. UNSUB#1 demanded their money (\$300 dollars), ATM cards, and bags as UNSUB#2 held the shotgun. After robbing them of said items, UNSUB#1 proceeded to drive the Toyota Camry away from the ATM, taking both T.J. and Y.C. with them. During the incident UNSUB#1 was threatening he had a handgun, but T.J. advised she never observed it.
5. T.J. stated that after leaving the ATM, UNSUB#1 drove them across state lines and to an apartment complex in Kansas City, District of Kansas. At the complex they met up with a silver Jaguar vehicle containing Subject #3, later identified by T.J. from a photo lineup as **Jamerl M. Wortham (B/M, DOB: 08/22/1985)**. At the complex, UNSUB#2 then forced T.J. out of the vehicle and into the Jaguar with the driver, **Wortham**, and a third victim, M.M. After **Wortham** and the two UNSUBS talked for a minute, they forced everyone into Y.C.'s Toyota Camry, with **Wortham** driving.
  6. **Wortham** drove them to another ATM in the area of 38th Street in Kansas City, District of Kansas, as UNSUB#2 continued to hold the victims at gunpoint in the backseat. Upon arrival at the second ATM, the subjects made T.J. and Y.C. withdraw money using their ATM cards. The subjects then decided they wanted to acquire drugs and drove to a BP Station in Kansas City, Kansas, there purchasing some narcotics. After driving to several other locations, they eventually arrived back at the Jaguar. During the drive, UNSUB#1 forced the victims to smoke PCP as he used methamphetamines. The subjects discussed what to do with the three victims to include UNSUB#1 saying he was going to take all three home with him. The subjects eventually decided that **Wortham** would take T.J. in the Jaguar while M.M. and Y.C. went with UNSUB#1 and UNSUB#2 in Y.C.'s Toyota. Both vehicles left the apartment complex with the Jaguar driven by **Wortham**, following the Toyota Camry.
  7. Soon after, on April 9, 2016, Kansas City, Kansas police officers attempted to stop a 2004 silver Jaguar in the area of 3rd and Central Avenue, Kansas City, District of Kansas. During the traffic stop the vehicle fled and struck a bridge median. The driver, **Wortham**, was taken into custody after a foot pursuit. Also in the vehicle was victim, T.J. Inside the Jaguar, officers located a sawed-off, black, Coast To Coast Master-Mag 20-gauge shotgun, Model #CC660, loaded with four rounds of Remington 20-gauge shotgun shells. The serial number was filed off of the shotgun. The shotgun was not manufactured in the state of Missouri and, thus, has affected interstate commerce. The Jaguar, bearing Kansas license plate B116663, was reported stolen out of Kansas City, District of Kansas. At the time T.J. did not mention the kidnapping to KCKSPD and was released from the scene. During her interview, T.J. explained she hadn't mentioned it during the initial contact with police because the three subjects had threatened to harm the other girls if anyone spoke to the police. She believed the Toyota with the other two UNSUBS and victims were watching as **Wortham** was apprehended and the victims lives were in danger. T.J. proceeded home after she left the crash scene to check and see if her roommate, YC,

- was home. When she arrived home, Y.C. was still missing and at that time T.J. contacted the Kansas City, Missouri Police Department to report the carjacking, robbery, and kidnapping.
8. During the interview of T.J., she was shown a photo lineup of six similar looking individuals numbered 1-6. The subject in position #5 was **Jamerl M. Wortham**. T.J. stated, the subject in position #5 favors the Jaguar driver, except in the photo his hair is longer and has darker eyes.
  9. On April 9, 2016, Kansas City, Missouri police detectives spoke with the victim identified as Y.C. Y.C. confirmed the account given by T.J. until Y.C. and T.J. were ordered into separate vehicles. At the apartments, T.J. was forced to get into the Jaguar with **Wortham**, while Y.C. remained in the Camry. Y.C. noted that the subjects put the shotgun in the Jaguar. Y.C. was told to get in the front passenger seat of her Toyota while UNSUB#1 drove. In the backseat of the Toyota was UNSUB#2 and M.M. As the cars got onto the highway headed to Kansas City, Missouri, the Jaguar (which had been behind them a distance) “whipped” in front of the Toyota and Y.C. noticed it was being pursued by police cars as it fled. She saw **Wortham** wreck the Jaguar then fled on foot. UNSUB#1 watched as **Wortham** was taken into custody then made a U-turn and fled in the opposite direction.
  10. The two subjects in the Toyota drove the remaining victims to the area of Blue Springs, Missouri, where they again stopped to buy drugs. UNSUB#1 proceeded to drive to a gas station in the area of 65th Terrace and State Avenue, District of Kansas, where he dropped UNSUB#2 off. UNSUB#1 told Y.C. to get in the driver’s seat and drive him to the bus stop. Around 9:00 a.m., they arrived at 108 Askew Avenue, Kansas City, Western District of Missouri, where M.M. jumped out of the car and ran away. After M.M. escaped, UNSUB#1 told Y.C. to drive away and she did. As they drove away, they began to argue. Y.C. slammed on the brakes causing the subject to hit his face. She attempted to force UNSUB#1 out of her car at the same time trying to get someone’s attention by hitting the horn with her knee. When that didn’t work, she attempted to run from the car but the subject grabbed her by the hair. Once she freed herself from his grip, she ran from the car as he chased her. Y.C. used the keys to set off the vehicle alarm in an attempt to trying to get someone’s attention. She ran several blocks and flagged down a motorist who took her back to her car. Y.C. also stated that during the kidnapping the victims were forced to smoke PCP. She also advised she was sexually assaulted while driving with UNSUB#1, who had put his hands up her shirt under her bra and down her pants near her vagina.
  11. During the interview of Y.C., she was shown a photo lineup of six similar looking individuals numbered 1-6. The subject in position #5 was **Jamerl M. Wortham**. Y.C. identified **Wortham** as the 3rd subject.
  12. On April 9, 2016, Kansas City, Missouri police detectives spoke with the victim identified as M.M. M.M. advised she was at Harpo’s Bar, 4109 Pennsylvania Avenue, Kansas City, Western District of Missouri, around 11:00 p.m., on April 8,

2016. M.M. went outside to wait on the car and got into a car she thought was her Uber car, but, evidently, was the Jaguar driven by **Wortham**. M.M. confirmed the account given by T.J. and Y.C.. She further advised that, during the ordeal, UNSUB#2 kept saying the subjects should shoot the three victims and “get rid of them.”

13. On April 10, 2016, I interviewed **Wortham** at the Wyandotte County Jail in Kansas City, District of Kansas. During a post-*Miranda* interview, **Wortham** stated that he left his house on April 8, 2016, on 38th Street, in Kansas City, District of Kansas, at approximately 10:30 p.m., and walked to a gas station to get a cigar. **Wortham** stated that he ran into two black males that he’d never seen before, who identified themselves only as CJ and Billy. CJ and Billy told him that they wanted to find someone at an ATM to rob them. **Wortham** stated that he agreed to participate in the robbery with them he just didn’t want anyone to get hurt. **Wortham** then accompanied CJ and Billy to McDonalds where he bought them all something to eat. **Wortham** advised that all three exited McDonalds and walked to the area of the Taco Bell looking for a car to steal. **Wortham** stated, they observed a guy getting out of a Jaguar and enter a gas station. **Wortham** kept walking while CJ and Billy stole the Jaguar and drove to him and picked him up.
14. The three of the subjects drove to a house, belonging to a male identified as “Samare,” where **Wortham** called his wife. **Wortham** stated that, following the phone call, they left “Samare’s,” with **Wortham** driving, Billy in the front passenger seat, and CJ in the back seat with the shotgun. When they left Samare’s they were planning to commit the robbery at an ATM. They drove to the BP Gas Station in the area of 47th and Paseo, Kansas City, Western District of Missouri, but did not see anyone at the ATM located at that gas station. **Wortham** kept driving and saw a white girl sitting on a curb. Billy got out of the car and started talking with her. Billy got the girl into the car with them and he continued to drive around. **Wortham** stated, at one point during the night he observed Billy rubbing on the girl and putting his hand up her shirt and down her pants as they were driving around. **Wortham** drove to Grand Slam Gas Station in downtown Kansas City, Western District of Missouri, where they sat watching the Bank of America ATM, waiting for someone to use it so they could rob them.
15. Once they observed a red Toyota, occupied by two females, at the ATM, he pulled the Jaguar behind the Toyota and let CJ and Billy out. CJ and Billy exited the Jaguar and ran up to the women in the red Toyota. Billy went to the driver’s side and CJ went to the passenger side with the shotgun demanding the victims’ money. CJ and Billy forced their way into the red car and told **Wortham** to follow them. **Wortham** said they drove on highway and went to an apartment complex in the District of Kansas where they parked the cars. **Wortham** and the white female then got into the Toyota with Billy, CJ, and the other females. **Wortham** stated that he drove them to an ATM where they attempted to make one of the girls withdraw more money. The money withdraw was not successful, causing CJ and Billy to get mad. **Wortham** then drove back to the Jaguar where CJ and Billy gave him around \$100 dollars.

During this period, **Wortham** advised that the subjects discussed what to do with the girls as they drove them around to multiple locations to ATMs and to purchase drugs. He admitted they forced the women to use PCP and kept them against their will by threatening their lives.

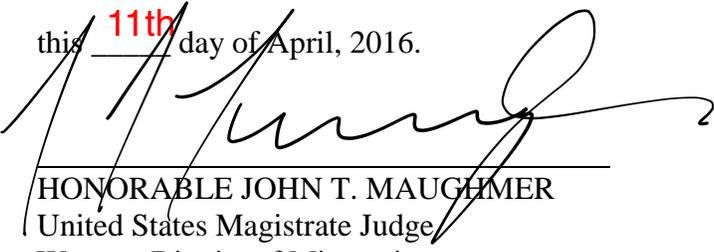
16. Once back to the apartment complex, **Wortham** and one of the women got into the Jaguar. Billy put the shotgun in the back seat of the Jaguar, wrapped up in a coat. **Wortham** took the shotgun out of the backseat and put it next to his leg between the center console and his seat. **Wortham** admitted it was to threaten the female victim. **Wortham** stated that he was going to follow CJ and Billy, with the other two girls, to a different ATM and make another attempt to withdraw money.
17. **Wortham** advised that Billy was the one who forced the girls use drugs. **Wortham** admitted to helping plan the carjacking and robbery, participating in the kidnapping, and driving the victims car to ATMs to take their money. He advised he never touched the females in any sexual way but stated, he had observed Billy sexually assault one of victims when he was in the backseat. He also admitted they threatened the girls that they would kill them if they talked.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

  
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JASON R. RAMSEY  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me

this ~~11th~~ <sup>11th</sup> day of April, 2016.

  
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HONORABLE JOHN T. MAUGHMER  
United States Magistrate Judge  
Western District of Missouri

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