

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

POLICE NO. :	18-006831
PROSECUTOR NO. :	095443610

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
TONY MACK)	
1601 Elmwood Ave.,)	CASE NO. 1816-CR
Kansas City, MO - 64127)	DIVISION
DOB: 05/08/2000)	
Race/Sex: B/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840911.0)

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 January 28, 2018, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Leon Taylor caused the death of Leon Taylor 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 (571.015-001Y19755213.0)

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 January 28, 2018, 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

State vs. Tony Mack

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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), RSMo, committed **the class A felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about January 28, 2018, at 16th and Elmwood, Kansas City, in the County of Jackson, State of Missouri, the defendant knowingly shot a firearm at a motor vehicle, namely a gray 2000 Toyota Avalon, and as a result of the above described conduct, Leon Taylor suffered injury or death.

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 (571.015-001Y19755213.0)

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 January 28, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant

State vs. Tony Mack

committed the foregoing felony of unlawful use of a weapon 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count V. Assault - 2nd Degree (565.052-001Y20171305.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed **the class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 28, 2018, in the County of Jackson, State of Missouri, the defendant recklessly caused physical injury to Kijon L Jackson by means of discharge of a firearm.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count VI. Armed Criminal Action (571.015-001Y19755213.0)

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 January 28, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the second degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant

State vs. Tony Mack

committed the foregoing felony of assault 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jamie K. Hunt
Jamie K. Hunt (#50401)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, MO - 64106
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State vs. Tony Mack

WITNESSES:

DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO - 64106

DET Jason C. Findley, 1125 Locust, Kansas City, MO - 64106

DET Heather D. Leslie, 1125 Locust, Kansas City, MO - 64106

DET James H. Price, 1125 Locust, Kansas City, MO - 64106

PO Robert A. Reilly, 1125 Locust, Kansas City, MO - 64106

DET Timothy R. Taylor, 1125 Locust, Kansas City, MO - 64106

DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01-29-2018

CRN: 18-006831

I, Det. Bonita Y. Cannon, #4585 Kansas City Missouri Police Department
(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 01-28-2018, at 16th Street and Elmwood in
(Date) (Address)

Kansas City, Jackson County Missouri Tony Mack Jr.
(County) (Name of Offender(s))

B/M 05-08-2000 / SS# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 01-28-2018 at 1257 hours officers of the Kansas City Missouri Police Department, were dispatched to 16th and Elmwood in regard to shots fired, male possibly shot.

Upon their arrival they located several shell casings at the intersection of 16th and Elmwood. While at the scene officers were notified of two shooting victims that arrived at Truman Medical Center via private vehicle. One of the males was pronounced deceased a short time later. The second victim was being treated for his injuries.

The Jackson County Medical Examiner ruled the deceased victim's death a Homicide as a result of multiple gunshot wounds.

The surviving victim (#2) was contacted on 01-29-2018. He stated the following he was contacted via telephone by his cousin witness #1 asking him to join witness #1 and the victim while they run errands. He agreed to do so and was picked up witness #1. They then picked up victim #1 and his girlfriend, witness #2 from President Garden Apartments, 80th and Troost.

Victim #2 stated they ran errands and ended up at a liquor store on 35th Street. He further stated everyone was getting along and there did not appear to be any issues. At some point witness #2 stated she needed to use the restroom. She wanted to go to 16th and Elmwood to do so. Upon their arrival the witness #2 exited the vehicle and went into 1601 Walrond. She was inside for a few minutes, before coming out onto the front porch with the suspect, **Mack**. They stayed on the porch for a moment before approaching the vehicle on passenger side (at the door of victim #1). **Mack** asked victim #1 if he worked on brakes, while pointing to the vehicle in front of 1601 Elmwood. Victim #1 told him, "No." At some point they got on the topic of victim #1 abusing witness #2.

Victim #2 stated **Mack** pulled out a black and silver handgun and fired several times in the vehicle hitting victim #1 and victim #2. **Mack** ran east from the scene, while witness #2 just stood there. Witness #1 then drove the victims to Truman Medical Center, where victim #1 was pronounced deceased and victim #2 received treatment for his injuries.

PROBABLE CAUSE STATEMENT FORM

CRN 18-006831

Victim #2 was shown a line-up of six individual photographs with **Mack** as the #2 photograph. Victim #2 identified **Mack** as the shooter (suspect). He further stated **Mack** has short dreads was wearing a blue hooded jacket.

Witness #1 statement was consistent with that of victim #2's statement. When shown a line-up with **Mack** in position #4, witness #2 initially selected **Mack**, however couldn't decide between subjects #4 (**Mack**) and subject #5.

Witness #2 stated she was with both victims and a third male. Her brother was trying to sell a vehicle and she needed to use the restroom. She decided to have them take her to 1601 Elmwood (her mother's address). She went inside and ended up having a conversation with her son, about a scab under her nose. Her son, **Mack** asked her what happened. When she told him she fell he didn't believe her. Witness #2 stated she showed her son, **Mack**, her knees, at which time he told her he believed victim #1 assaulted her. She left the house, with **Mack** following behind her. **Mack** approached the vehicle asking victim #1 about the brakes on a car. **Mack** then accused victim #1 of assaulting witness #2. While doing so witness #2 stated her son, **Mack** pulled out a handgun and shot into the vehicle. Witness #2 stated she chased after **Mack**, as the victims and witness #1 drove away. Witness #2 stated she flagged down a passing motorist and got a ride to Truman Medical Center. Upon showing witness #2 a photograph of her son, **Mack**, she denied knowing him. She then became uncooperative.

Printed Name Det. Bonita Y. Cannon, #4585

Signature



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

Judge

Circuit Court of _____ County, State of Missouri.