


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

POLICE NO. :	18-002468
PROSECUTOR NO. :	095445853
OCN:	U7019106

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
JA'QUANN L MCCARVER)	
918 Armour Blvd #119)	CASE NO. 1816-CR
Kansas City, MO 64130)	DIVISION
DOB: 02/26/2000)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

COMPLAINT

Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class B Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about May 29, 2018, at 1911 Holiday Drive, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm from a grey Chevrolet Impala, a motor vehicle.

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. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

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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 May 29, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count I, all allegations of which are incorporated herein by reference, and the defendant 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 III. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 May 29, 2018, in the County of Jackson, State of Missouri, Tyson White was killed by being shot as a result of the perpetration of the class B felony of Unlawful Use of a Weapon under Section 571.030, RSMo committed by the defendant on or about May 29, 2018, in the County of Jackson, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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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 May 29, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count III, 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.

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.

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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/ Daniel Portnoy
Daniel Portnoy (#62186)
Assistant Prosecuting Attorney
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WITNESSES:

1. PO Beau D. Bailey, 1200 Main Street, Grandview, MO 64030

2. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

64106

5. DET Brian Poynter, 1200 Main Street, Grandview, MO 64030

6. DET Ryan Seeger, 1200 Main Street, Grandview, MO 64030

7. [REDACTED]

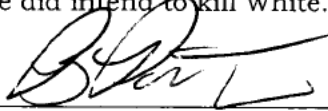
[REDACTED]

and McCarver got into an argument and McCarver told White to get out of the car. [REDACTED] said she turned around to see what was happening and saw McCarver holding a small black handgun. [REDACTED] said that White was getting out of the car when she heard a gunshot.

On 06/01/2018 at approximately 1530 hours, Detectives responded to 918 Armour Blvd apt 119 in Kansas City, MO to attempt to make contact with [REDACTED] to request a formal interview. Upon making contact with [REDACTED], she opened the door and invited Detectives into her apartment. While Detectives were speaking with [REDACTED], McCarver walked out of the back bedroom into the living room and was identified and taken into custody on his stop order. [REDACTED] requested to go to the station with McCarver so she could give her statements.

During [REDACTED] formal interview she stated that McCarver had gone to White's residence to sell him a handgun. [REDACTED] stated that McCarver asked White for his address and informed White he had arrived using Facebook messenger. [REDACTED] stated that White got into the back passenger side of the vehicle and handed McCarver \$150 dollars, and then a short moment later White exited the vehicle while McCarver was pointing the gun in his direction. [REDACTED] stated that McCarver fired the weapon once, into the air to scare White and then they drove away. [REDACTED] stated that she did not know until later in the evening that White had died from the gunshot wound. [REDACTED] stated that [REDACTED] and McCarver split the money and stated that the gun was left in the car that was left at 2427 Mersington.

McCarver was read his Miranda warning and signed the GVPD Rights form without asking for an attorney. McCarver stated that White had reached out to him looking for a gun to protect himself so McCarver had found him one. McCarver stated that he used his Facebook messenger app under vanity name HeadShot Quann to aske White his address and to tell him that he had arrived. McCarver stated that he had intended to sell White the gun, but when White got into the car and handed him \$150, he decided that he wanted to keep the gun and the money. McCarver stated that White was told to get out of the car and as White was exiting the vehicle, McCarver stated that he shot once to scare White. McCarver stated that he did intend to kill White.



DETECTIVE

THE COURT FINDS PROBABLE CAUSE.

JUDGE

DATE