

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

<b>POLICE NO. :</b>	18-026444 / 18-026563
<b>PROSECUTOR NO. :</b>	095447077
<b>OCN:</b>	

**STATE OF MISSOURI,**

)  
**PLAINTIFF,** )

**vs.**

**DAEJONA M. HOLMES**

**5030 Belmeade Rd.**

**Kansas City, MO 64129**

**DOB: 12/26/2002**

**Race/Sex: B/F**

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**DEFENDANT.** )

**CASE NO. 1816-CR**

**DIVISION**

**COMPLAINT**

**Count I. Murder 2nd Degree (565.021-001Y19840901.0)**

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 April 9, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Brian L. Starr 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.

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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 April 9, 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 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. Murder 2nd Degree (565.021-001Y19840901.0)**

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 April 9, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Kinderly Holmes by shooting her.

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.

**State vs. Daejona M. Holmes**

**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 April 9, 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.

**Count V. Tampering With Physical Evidence In Felony Prosecution  
(575.100-001Y20175006.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **class D felony of tampering with physical evidence**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 9, 2018, in the County of Jackson, State of Missouri, the defendant concealed a handgun with the purpose to impair its availability in a homicide investigation, an official investigation, and thereby impaired and obstructed the prosecution of Daejona Holmes for the crime of murder in the second degree, a felony.

The range of punishment for a class E 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 four (4) 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

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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.

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/ Kelsey L. Blackwell*

Kelsey L. Blackwell (#63713)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
2. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
3. SGT Barbara J. Eckert, 1125 Locust, Kansas City, MO 64106
4. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
5. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
6. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
7. PO Marcus Smith, 1125 Locust, Kansas City, MO 64106
8. PO Slade A. Whetro, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 05/21/2018

CRN: 18-26444/18-26563

I, Detective Chason Crowell #5228  
(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 04-09-2018, at 5030 Belmeade Rd in  
(Date) (Address)

Kansas City, Jackson Missouri Daejona M. Holmes  
(County) (Name of Offender(s))

BF,12/26/2002 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 04-09-2018 at 1929 hours Officers of the Kansas City Missouri Police Department were dispatched to 5030 Belmeade Road, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival they were able to gain entry into the residence through the back of the residence. Once inside the residence, they located Kinderly Holmes, BF, 09-12-1980 upstairs in a bedroom and Brian Starr, BM, 05-10-1979 downstairs by the front door. Both victims were deceased from apparent gunshot wounds. The Jackson County Medical Examiner ruled their deaths Homicide. Victim Holmes was found to have been shot one time in the stomach. Victim Starr was found to have been shot three times, twice in the trunk and once in the mouth.

The juvenile daughter of the victim's had called 9-1-1 from a different location. At the time of the 9-1-1 call she told the call-taker that a robbery had occurred at the residence and both parents were shot. When officers contacted her at the McDonalds on Eastwood Traffic way, she then told them that her father had shot her mother and she had then shot her father.

Detectives talked to a neighbor during the area canvas who recalls hearing three shots around 1800 hours.

While processing the scene on the first floor, victim Starr was found lying at the bottom of the stairs that lead up to the second floor, he was near the front door. He was barefoot and a pair of men's house slippers were observed in the living room by the couch. The television was paused. There was apparent blood spatter on the front door and outside on the concrete stoop indicating the front door had been open when the victim was shot. Evidence showed the victim had been moved after he had been shot. There were drag marks in the blood and a shoe print in blood under his right leg.

Victim Holmes was found on the floor of DAEJONA HOLMES bedroom. The room appeared to be in disarray with the mattress pushed back off the box springs. Several items were found to be between the mattress and box springs indicating that this was a place items were stored. A pair of house shoes with blood on the sole was located between the victim's legs. The tread of these shoes matched the shoe print in blood under the leg of victim Starr. A pair of shorts with blood on them was found lying on the floor outside the door of this bedroom. Luminol showed bloody shoe impressions from the downstairs up the stairs and into this bedroom.

The gun was found across the street from the residence in a puddle of water.

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A hand written drawing was located in a backpack. The drawing was of stick figures with one figure shooting another figure. The figures were labeled with "Dad" above one and "Me" above the second. The "Me" figure was holding a gun pointed at the "dad" stick figure. It then shows a third stick figure that has been shot with x's as eyes and "blood" around it.

Detectives obtained a Search Warrant for DAEJONA HOLMES phone. The data from the phone showed a recent search of "Scary movies where kids kill parents". It also showed rap lyrics about wanting her father dead. A video was found on the phone from February 15, 2018 showed DAEJONA HOLMES dancing in her bedroom while holding a handgun. DAEJONA HOLMES had possession of her mother's cell phone at the time of police contact. She had called 9-1-1 from this phone, but was unable to provide detectives with the code to open the phone. A Court Order for call detail information on this phone showed 9 calls made between 1825 hours and the 911 call at 1925 hours. Several of these calls were to a friend of DAEJONA HOLMES.

A witness from the phone calls on victim Holmes phone was developed and interviewed. The witness stated he received a phone call from DAEJONA HOLMES saying she needed help. He then met DAEJONA HOLMES near the Mc Donald's at Eastwood Trafficway and she told him her parents had been shot. The witness advised he had to talk DAEJONA HOLMES into calling 911. The witness drove her to the McDonalds where he dropped her off.

On 4/9/2018 DAEJONA HOLMES was transported to Police Headquarters for questioning. Present was her guardian and a DJO. HOLMES stated that she had been in the kitchen warming up macaroni in the microwave. She had heard her parents arguing but was unable to say what the argument was about. She heard a gunshot and proceeded to walk from the kitchen and up the stairs to see what happened. While going up the stairs, she passed her father who was coming down the stairs. No words were exchanged. She went to her room where she found her mother deceased, laying on the floor and a gun was lying next to her. HOLMES picked the gun up off the floor and walked down the stairs. She observed her father walking toward her and so she shot him. She indicated that at one time he was on his knees. She advised that she then ran out the front door, realized she did not have her cell phone so she ran back in the house and grabbed her phone and her mother's phone. She also went up the stairs to her bedroom to get her house key. She left the house, shutting and locking the front door and ran to McDonalds where she called 9-1-1. She also stated that upon leaving the house she had taken the gun with her and thrown it in a yard down the street from her house. She stated that the reason she told the dispatcher that there had been a robbery was because she was scared.

On 05/11/2018 DAEJONA HOLMES was again questioned by detectives. Her guardian and a DJO were present. The reason for this second questioning was to clarify details that had not been provided in the initial questioning. HOLMES stated that she went back into the residence twice after initially leaving. Once to get her cell phone and then she went back in to get her mother's cell phone. She admitted to moving the victim Starr and stated she did this to "close the front door". She stated that the front door was open at the time of the shooting and could not explain why she did not run out of the house after hearing the initial gunshot instead of going upstairs. She admitted to changing her clothing prior to leaving the scene. When questioned about making the 9 phone calls from her mother's phone and the fact that it took her an hour to call 9-1-1 she could not provide a reason.

Printed Name Det. Chason Crowell #5228 Signature Det. CC #5228

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

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\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.