IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

POLICE NO.	: 18003708
PROSECUTOR NO.	: 095447267
OCN	77364606
STATE OF MISSOURI,)
PLA	AINTIFF,)
vs.)
)
STEVEN SAMSON)
3316 Cypress Ave) CASE NO. 1816-CR
Kansas City, MO 64128) DIVISION
DOB: 10/14/1988)
Race/Sex: B/M)
)
DEFI	ENDANT.)
COM	

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

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 August 6, 2018, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, with the purpose of causing serious physical injury to Dennis M Gordon caused the death of Dennis M Gordon 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 (571.015-001Y19755212.0)

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 August 6, 2018, in the County of Jackson, State of

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Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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.

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/ Bryan O. Covinsky
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WITNESSES:

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

2.

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- 6. Dennis M Gordon, 14027 Dornoch, Grandview, MO 64030
- 7. DET Brian Poynter, 1200 Main Street, Grandview, MO 64030
- 8. SGT Dean Van Winkle, 1200 Main Street, Grandview, MO 64030

REPORT NUMBER 18003708 GRANDVIEW STATEMENT OF PROBABLE CAUSE

I, Detective Ryan Seeger, 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 08/06/18 at 1249 hours, at White Ave and High Grove Road, Grandview, Jackson County, Missouri, Steevens Samson B/M 10/14/1988 committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 08/06/2018 at approximately 1249 hours, Grandview Officers responded to the intersection of White Ave and High Grove Road in regard to a reported shooting with a party down. Officer located an unconscious male (Dennis Maurice Gordon Jr. B/M 07/10/77) with an apparent gunshot wound to the chest. Another male B/M 01/25/77 was holding Gordon as Officers arrived and advised that a male in a dark green 4 door sedan shot Gordon. Gordon was declared deceased on scene from an apparent gunshot wound. Grandview Detectives Responded to and processed the scene and the Jackson County Medical Examiner responded to take custody of the body.

was transported to the Grandview Police Station to have a formal interview. During the interview, said that he and Gordon were going to the gas station when "Dude" pulled up and shot Gordon. was asked who "Dude" was and he described a tall Mexican-Italian male that Gordon had been in a fight with at 7-Eleven a couple weeks ago was the driver of the vehicle. Detectives located GVPD report #18003535 in which officers responded to 7-Eleven regarding a fight in progress (on 07/29/18). The report indicated that both Gordon and where present along with and Gregory E Smith B/M 10/06/93. was asked if he could identify the male if he saw him again and he stated that he could. A photo lineup was created that included Gregory and described the passenger as a black male with short braids.

Security Video was recovered from 13100 Spring Street (Discount Smokes and Liquor) that showed a dark 4 door vehicle pull into the parking lot at 1244 hours on 08/06/2018. The driver of the vehicle goes into the store and is recorded on camera wearing a gray t-shirt with a blue "15" written on the front. As the male is walking into the store, another black male appears to be talking to him from the passenger side window. The driver buys something with change and then gets back into the 4 door sedan and pulls out of the parking lot and north onto White Ave at approximately 1247 hours.

More security video footage was recovered from 1805 High Grove Road. It should be noted that the time on the cameras is incorrect and is one hour behind the actual time. The footage showed a dark in color sedan driving north

on White Ave at 11:47:25 hours (video time). The video shows and Gordon walk into the frame south on White Ave at 11:47:53 hours (video time). The two walk just out of frame and the dark sedan is observed driving south back down White Ave at 11:48:10 hours (video time). The dark sedan drives out of frame and then is seen traveling east on High Grove Rd at 11:48:28 hours (video time).

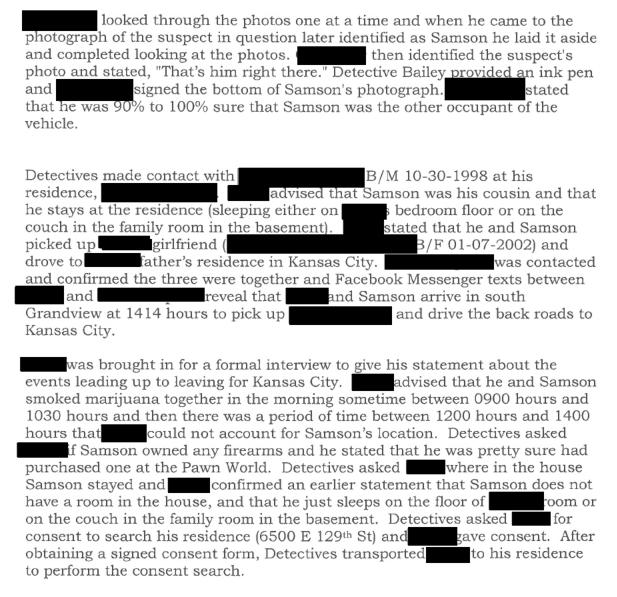
A DOR check showed Gregory's address as 6404 E 129th Street, Grandview MO. Detectives drove by the residence on 08/07/18 at approximately 1000 hours and located a dark green KIA (MO YK8N8D). The vehicle appeared to be the vehicle observed in the surveillance video from Discount Smokes and 1805 High Grove.

A search warrant was obtained for 6404 E 129th Street and for the green KIA. On 08/07/18 at 1617 hours, Grandview Police executed the search warrant and located Gregory inside. Gregory exited the residence and was taken into custody. Also inside the residence was Gregory's and Sampson, Steevens B/M 10-14-1988. Said that she was the owner of the green KIA and that Gregory and Samson left in her KIA on 08/06/2018 just after noon. Said the two were gone for about an hour before they returned home. Detective Poynter asked if Samson had braids on 08/06/18 and she said he did. Samson was taken into custody. It should be noted that a SCCY 9 mm handgun was recovered from the residence during the execution of the search warrant.

On 08-07-2018 at approximately 0848 hours, Detective Poynter read Samson the Miranda Warning. Samson said that he understood and was willing to speak with Detective Poynter but was not willing to sign the rights waiver form. Detective Poynter asked Samson what he was doing between 1200 hours and 1300 hours on Monday 08-06-2018. Samson said he didn't know what was going on. Detective Poynter asked Samson who he left 6404 E 129 St with Smith in green Kia. Samson said he was asleep until 2 (1400 hours) and then left with his cousin to sfather's house in Kansas City.

on 08-08-18 was transported to the Grandview Police Station in regards to viewing a photo line-up. Detective Bailey escorted into interview room #1 at approximately 0920 hours. viewed 6 black and white full page photographs including the suspect whom was unknown to Officer Bailey at the time the photo line-up was provided. paused on two of the photos but stated that he couldn't be 100% sure whether he could positively identify the suspect the observed in the vehicle during the incident. divised that he had only seen this particular suspect 1 time which was during the incident. Detective Bailey stopped the interview and provided a ride home. During the drive stated that if he could see the photo line-up in color, he may be more positive about identifying the suspect.

On 08-08-18 at 1032 hours, Detective Bailey reentered interview room #1 with and provided the same line up with photographs in full color.



Detectives located a black in color Glock 23 Gen 4 40 caliber pistol lying on the floor under the coach in the family room in the basement of the home. The Glock had serial number WKL814 and had a magazine inserted that contained 11 40 caliber rounds. The four rounds farthest down in the magazine were Winchester S&W FMJs and there were 7 rounds inserted into the magazine on top of those rounds that were Barnes 40 S&W Hollow points.

Detectives recovered the Glock with the magazine of rounds as evidence. On 08-09-2018, Detectives transported the Glock found at 6500 E 129th St, the SCCY 9MM located at 6404 E 129th St during the search warrant, a Taurus 9mm handgun willingly surrendered to Police by the home owner of 6404 E 129th St, and the bullet recovered from the victim's chest cavity by the Jackson County Medical Examiner's Office to the Kansas City Police Crime Lab to be processed for evidence.

Detectives located a sales receipt at Pawn World (12804 S 71 Hwy) in Grandview showing that Steevens Samson purchased the Glock 23 with serial number WKL814 on 03-27-2018 at 1656 hours. Copies of the transaction were made and placed into the case file.

On 08-10-2018 Grandview Detectives were notified by a Forensic Firearms Examiner at the Kanas City Police Crime laboratory that it had been determined that the bullet removed from the victim's chest was fired from the Glock 23 that was purchased by Samson.

DEPECTIVE #230

THE COURT FINDS PROBABLE CAUSE.

JUDGE		
DATE	 -	