

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

<b>POLICE NO. :</b>	18-077519
<b>PROSECUTOR NO. :</b>	095448444
<b>OCN:</b>	HS005108

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MARLAWN D. BETTS</b>	)	
<b>917 Prospect Ave.</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64127</b>	)	<b>DIVISION</b>
<b>DOB: 05/07/1994</b>	)	
<b>Race/Sex: B/M</b>	)	
<b>[REDACTED]</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2nd Degree (565.021-001Y19840999.0)**

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 October 6, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Jesse Young 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 (571.015-001Y19755299.0)**

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 October 6, 2018, in the County of Jackson,

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State of 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/ Luke H. Alsobrook*  
Luke H. Alsobrook (#66442)  
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**WITNESSES:**

1. [REDACTED]
2. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. SGT Matthew D. Housh, 1125 Locust, Kansas City, MO 64106
5. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
6. DET Brent R. Taney, 1125 Locust, Kansas City, MO 64106
7. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106
8. [REDACTED]
9. [REDACTED]
10. DET Kevin Zoellner, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 10/08/18

CRN: 18077519

I, Detective Danny Thomas #4933 (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 10/06/18, at 2320 E. 9th Street in (Date) (Address)

Kansas City, Jackson Missouri Marlawn Betts (County) (Name of Offender(s))

B/M 05/07/1994 committed one or more criminal offense(s). (Description of Identity)

Murder
ACA

The facts supporting this belief are as follows:

On 10/06/18 at approximately 2331 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 2304 E. 9th Street in regard to a shooting.

Upon arrival they discovered a black male victim lying at the bottom of the steps near 2320 E. 9th Street. He was suffering from apparent gunshot wounds. The victim died of his injuries and the case was ruled a homicide.

Witness #1 stated she was inside 2320 E. 9th Street Apartment C with the victim, the suspect, who is her boyfriend (Marlawn Betts), her young son and the victim's girlfriend (witness #2). She stated she was on the couch in the living room, the victim and witness #2 were on the other couch and Betts was in the bedroom asleep. Witness #1 stated the victim went into the bedroom and an argument ensued between the victim and the suspect. The victim said, "C'mon, come outside". The victim walked outside followed by the suspect. Shortly thereafter witness #2 stepped outside by the stairs. Witness #1 stated she was standing by the front door when she observed gunfire coming from where Betts was standing. Witness #1 was shown a single photograph of Betts whom she identified as her boyfriend of four years and the person she saw arguing with the victim prior to the shooting.

Witness #2 stated she was inside 2320 E. 9th Street Apartment C with her boyfriend (victim), witness #1, witness #1's son, and the suspect (Betts). Witness #1 and witness #2 were in the living room when the victim went into the bedroom with the suspect. The suspect and victim got into a verbal altercation and the victim said, "You want to go outside?" and the suspect said, "Okay". The suspect and the victim went outside and witness #2 followed because she saw a gun in the suspect's pocket. Witness #2 stated the suspect shot the victim when they got outside. Witness #2 was shown a photographic lineup consisting of six black males similar in appearance with Marlawn Betts, black male, 05/07/1994 in the #5 position. Witness #2 positively identified Betts as the suspect who shot the victim.

**PROBABLE CAUSE STATEMENT FORM**

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On 10/08/18 suspect, Marlawn Betts responded to Police Headquarters. While at Police Headquarters Betts was questioned about the incident with his attorney present. Betts stated he was inside the apartment at 2320 E. 9<sup>th</sup> Street with witnesses #1 and #2, the victim and witness #1's young son. He stated he was in the back bedroom when the victim approached him three separate times. The third time the victim threw a backpack which struck him in the head. Betts got up and went outside to get some air. He stated he was outside when the victim came out. He stated the victim threw a punch at him with his right hand and he saw him shoot at him with a gun he had in his left hand. Betts stated he subsequently pulled his gun out and fired two shots at the victim. He stated he left the scene and the gun fell out of his pocket at some point thereafter.

While being questioned Betts was advised the victim's injuries were not consistent with his account of events, specifically the victim being shot in the back of his head and in the cheek near his mouth. Betts acted out the incident while being questioned and held the "gun" in his right hand just above his waist in a manner which would be consistent with him having shot the victim in the mid to lower torso. In addition Betts was questioned about the inconsistencies with his statement and the two witnesses. He merely stated they must be lying.

It should be noted there was no evidence to support the victim being armed with a gun; nor did either witness mention the victim being armed with a gun.

Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

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

\_\_\_\_\_  
Judge

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