

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

POLICE NO. :	19-012363
PROSECUTOR NO. :	095451068
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
MARLON D DAVIS JR.	)	
6444 E. 12th Ter	)	CASE NO. 1916-CR
Kansas City, MO 64126	)	DIVISION
DOB: 05/10/2000	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

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 February 17, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Lakeasha Taylor caused the death of Lakeasha Taylor 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.

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 February 17, 2019, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of murder in the first degree charged in Count

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I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the first 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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WITNESSES:

1. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
2. Marlon Duane Davis Sr, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127

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4. DET Rodney E. Haney, 1125 Locust, Kansas City, MO 64106

5. [REDACTED]

[REDACTED]

6. [REDACTED] Darin K. Penrod, 1125 Locust, Kansas City, MO 64106

7. SGT Fredrick T. Phillips, 1125 Locust, Kansas City, MO 64106

8. DET Christopher S. Smith,

9. [REDACTED]

10. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 2/18/19

CRN: 19-12363

I, Det. Darin Penrod #4288
(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 2/17/19, at 6444 E 12th Terr in
(Date) (Address)

Kansas City, Jackson Missouri Marlon D. Davis JR
(County) (Name of Offender(s))

b/m, 5/10/2000, 5'11", 160lbs committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 2/17/19 at approximately 0944 hours, members of the Kansas City Missouri Police Department were dispatched to 6444 E 12th Terr, Kansas City, Jackson County, Missouri, 64126, in regard to a shooting. Upon arrival, officers discovered a deceased female, later identified as a resident, Lakeasha Taylor, b/f, 06/29/96, and several other subjects were present at the scene identified as potential witnesses by the responding officers. Taylor had succumbed to a single gunshot to the left upper torso and was pronounced deceased at the scene. Her death is being investigated as a homicide. A single shell casing was located in the room where Taylor's body was discovered. During the course of the investigation, several of the witnesses were revealed to be either staying at the residence sporadically or living at the residence. Several witnesses from the residence responded to 1125 Locust St. to speak with investigators.

A Witness described several individuals were hanging out at the residence including the victim and shooter, who were both residing at 6444 E 12th Terr, but were not in a romantic relationship. The Witness described everyone as joking around and sarcastically poking fun at each other. The victim made a sarcastic comment about the shooter and commented about how he didn't pay rent. Everyone laughed. The shooter, who was previously familiar to the witness, was identified by the witness as **Marlon D. Davis JR, b/m, 5/10/00**. The Witness described Davis as being angry at the comment made by the victim, and Davis left the room abruptly and returned with a handgun and approached the victim and shot her one time in the chest. Davis then fled the residence on foot in possession of the handgun. The Witness confirmed there was no physical provocation or threat from the Witness when Davis shot the victim. The Witness also stated when Davis abruptly entered the victim's bedroom, the victim's back was to the door, and Davis shot the victim as she turned to see who abruptly entered her room.

A second Witness also had previous familiarity with Davis and knew him by name and identified a single color photo of Davis as the shooter. The second Witness also confirmed the victim had not posed a threat to the suspect nor threatened the suspect to have provoked Davis. The second Witness observed Davis leave the proximity of the victim in an agitated state of mind after being offended by the victim's sarcasm, and responded downstairs to attempt to calm Davis down. The Witness observed Davis with a handgun when he followed Davis downstairs. The Witness spoke with Davis in attempt to diffuse his temper, and believed he had calmed him

PROBABLE CAUSE STATEMENT FORM

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down, and observed Davis walk away to a laundry area in the basement, and then saw Davis go back upstairs, but didn't observe a gun in Davis' possession. Seconds later, the Witness heard a single gunshot, then responded upstairs and attempted to intercept Davis who then pushed past him and left the residence on foot in possession of the handgun.

A third Witness provided a similar statement as the first and second witness and was also previously familiar with Davis and identified a single color photo of Davis and described how Davis shot the victim one time, after Davis became agitated with a sarcastic comment made about Davis in front of everyone who had been socializing in the house.

On 2/17/19 at approximately 1320 hours a Stop Order was issued for Davis and subsequently a Law Enforcement Bulletin was distributed department wide to KCPD personnel. On 02/20/2019 at approximately 2120 hours, Davis was taken into custody in Kansas City, Kansas. On 02/21/2019, detectives contacted Davis at Kansas City, Kansas Police Headquarters. Davis declined to make a statement after being advised of his rights per Miranda.

Printed Name Det. Darin Penrod #4288 Signature /s/ Det. Darin Penrod #4288

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

Judge

Circuit Court of _____ County, State of Missouri.