

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	19-021935
PROSECUTOR NO. :	095452837
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
SEAN M QUINN JR.)	
17316 E Susquehanna Dr)	CASE NO. 1916-CR
Independence, MO 64056)	DIVISION
DOB: 07/06/2002)	
Race/Sex: B/M)	
████████████████████)	
)	
)	DEFENDANT.

COMPLAINT

Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 25, 2019, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to ██████████ ██████████ by shooting ██████████.

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. 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 March 25, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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. 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. Robbery - 1st Degree (570.023-001Y20171204.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 25, 2019, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. Currency in the possession of [REDACTED], and in the course thereof defendant was armed with a deadly weapon.

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 March 25, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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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. . 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/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
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WITNESSES:

1. DET John Roach, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 5/29/2019

Report #: 19-21935

I, John Roach, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 03-25-19, at 17306 E. Susquehanna Drive, Independence, Jackson County Missouri, Sean M. Quinn Jr., (Race: Black, Sex: Male, DOB: 07-06-2002, Address: 17316 E. Susquehanna, Independence Missouri 64056, [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 03-25-19 at 1405 hours, Officers with the Independence Police Department were dispatched to 17306 E. Susquehanna Drive in regards to a shooting call. Upon arriving in the area Officer Stewart was advised by a citizen of a male who appeared to have been shot. Officer Stewart was led to the north side of 17306 where he observed a white male laying in the stairwell to the apartment complex with a blood on the front of his shirt.

Officer Stewart began first aid treatment on the male who identified himself as [REDACTED]. Officer Stewart lifted up [REDACTED]'s shirt and observed what appeared to be a bullet wound in the upper left side of [REDACTED]'s chest. [REDACTED] advised he had been shot by a subject who he knew as "Quinn". [REDACTED] advised he had met "Quinn" to purchase an item and during the transaction "Quinn" shot him and stole his MCM backpack and cell phone.

While Officer Stewart was providing first aid to [REDACTED], other IPD Officers began an area canvass. Witnesses in the area advised a black male was seen running east from the scene. Officer D. Abraham advised she was familiar with a Sean Quinn who fit the description of the black male seen running from the scene. Officer Abraham advised Sean Quinn lived at 17316 E. Susquehanna Drive which is was two buildings down from where the shooting occurred.

Officers set up a perimeter around 17318 E. Susquehanna Drive and made contact with the occupant; [REDACTED]. She stated Sean Quinn is her son and he was currently next door at 17316 E. Susquehanna Drive. [REDACTED] advised Sean's aunt; [REDACTED], lives at that address. Officer's made contact with [REDACTED] who confirmed that Sean was inside her residence. [REDACTED] and other occupants of the residence were escorted a safe distance away while IPD Officers set up a perimeter around the townhouse.

At 1635 hours, verbal announcements were made by officers from the exterior perimeter but Sean Quinn refused to exit the residence.

At 1639 hours, a juvenile black male ([REDACTED], 01-02-2003) exited the residence and was taken into custody. Detective Roach conducted a field interview with [REDACTED] who advised Sean Quinn was still inside the residence but refusing to come out.

At 1712 hours Sean Quinn exited the residence and was taken into custody without incident.

A consent to search form was signed by [REDACTED] allowing Detectives with IPD to enter and conduct a search of the residence. During the search [REDACTED]'s MCM backpack and cell phone were found on the ground floor of the townhouse. In the garage a black and silver Smith and Wesson .40 caliber handgun was located. Those items were recovered as evidence.

Sean Quinn was transported to IPD Headquarters and taken to a 3rd Floor interview room. Due to Quinn being 16 years old, Jackson County Family Court was contacted and DJO Camiel responded to IPD to be present during the interview. Also present during the interview was Quinn's mother; [REDACTED]. Prior to the interview DJO Camiel read Quinn the Miranda Warning of Rights.

Detective's Roach and Knox conducted the interview with Quinn. During the interview Quinn admitted to shooting [REDACTED], but stated it was [REDACTED] idea to rob [REDACTED]. Quinn stated he had met up with [REDACTED] to sell him a gun. Quinn stated prior to the incident he and [REDACTED] walked to an ATM in the area where [REDACTED] withdrew \$300. He stated they then walked to 17306 E. Susquehanna Drive to finish the transaction. Quinn stated once they were in the apartment building [REDACTED] came up behind [REDACTED] and grabbed the MCM backpack and placed [REDACTED] in a headlock. Quinn stated during the struggle [REDACTED] tried to grab his gun and that is when he shot [REDACTED]. He advised he and [REDACTED] fled the scene on foot taking [REDACTED]'s backpack and cell phone. When asked, Quinn stated he did not know what happened to the \$300.

At that point during the interview we stepped out and left Quinn in the interview room with [REDACTED]. Quinn then admitted to [REDACTED] that he had taken the \$300 from [REDACTED] and hid it in an upstairs bedroom at [REDACTED]'s house.

At 2000 hours, [REDACTED] was brought to IPD headquarters by his father; [REDACTED] for an interview. DJO Camiel was present for that interview as well and read [REDACTED] the Miranda Form. Detective's Roach and Knox conducted the interview with [REDACTED] and his father.

During the interview [REDACTED] advised he had been at Quinn's house when Quinn told him about the plan to rob Aguilar. [REDACTED] stated Quinn contacted [REDACTED] to set up a meeting for [REDACTED] to purchase a gun from Quinn. [REDACTED] stated Quinn told him he planned to rob [REDACTED] during the meeting. [REDACTED] stated he left the apartment and waited for Quinn and [REDACTED] at 17306 E. Susquehanna Drive. He stated when they arrived, Quinn told him to take [REDACTED]'s backpack. [REDACTED] stated when he grabbed the backpack, [REDACTED] began to fight him. [REDACTED] stated during their struggle is when Quinn shot [REDACTED]. He stated after Quinn shot [REDACTED] they both fled the scene on foot and went back to [REDACTED] house.

Due to [REDACTED] being a juvenile, a consent to search form for his phone was presented to [REDACTED]. [REDACTED] signed the form allowing Detective Roach access to the content of the phone.

Upon searching the phone a conversation via Facebook Messenger between [REDACTED] and Quinn was located. In the conversation Quinn advises [REDACTED] at 12:03 pm, "I gotta lick coming 40 min away

m”. “lick” is often used as street slang for “robbery”. Quinn later states “Lmk cuz this nigga on his way I’m bout to stick up”. ■■■■ replies with “what he got”.

■■■■ was transported to Centerpoint Hospital for treatment. It was found the bullet hit his spine and paralyzed him from the chest down.

Detective John Roach

/s/ Detective J. Roach

Print Name

Signature