

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

POLICE NO. :	16-097449
PROSECUTOR NO. :	095456936
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MARQUIS D. HENDERSON)	
3225 Cleveland Ave.)	CASE NO. 2016-CR
Kansas City, MO 64128)	DIVISION
DOB: 06/18/1996)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 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 December 29, 2016, in the County of Jackson, State of Missouri, Akheem Hobby was killed by being shot as a result of the perpetration of the class B felony of attempted distribution of a controlled substance under Section 195.211, RSMo committed by the defendant, acting alone or purposefully in concert with others, on or about December 29, 2016, in the County of Jackson, State of Missouri.

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. Marquis D. Henderson

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Jennifer S Tatum
Jennifer S Tatum (#70789)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
(816) 881-3628
jtatum@jacksongov.org

WITNESSES:

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
2. DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106
3. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
4. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
5. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
6. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
7. Ahkeem D. Hobby, 8311 E. 106th Court, Kansas City, MO 64134
8. 
9. DET Ray H. Lenoir, 1125 Locust, Kansas City, MO 64106
10. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
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12. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
13. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
14. PO Romell F. Richardson, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04-09-2020

CRN: 16-97449

I, Det. Daniel W. Frazier #5180
(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 12-29-2016, at 4801 Main in
(Date) (Address)

Kansas City, Jackson Missouri Marquis D. Henderson
(County) (Name of Offender(s))

BM, 6-18-1996, committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 12-29-2016 at 1403 hours, Kansas City, Missouri Police officers were dispatched to 4801 Main St on a shooting. Upon arrival they found Ahkeem Hobby, BM, 1-16-1989 lying deceased from an apparent gunshot wound on the 2nd level of the parking garage. Witnesses said that they heard several shots and then observed a black vehicle fleeing the scene occupied by unknown black males.

Surveillance footage obtained from the Public Library surveillance system showed a dark colored Toyota Camry drive into the garage and park (backed in) on the 2nd level. About 11 minutes later the victim's vehicle a green 1999 Honda Accord drives into the garage and backs in next to (East side) the Toyota Camry. A couple of minutes later the Toyota is seen to be rolling forward from the parking spot with the driver's door open without anybody in the driver's seat, then a male wearing a dark shirt is seen running from where the car had been parked and jumps into the driver's seat bringing the car to a stop. Another male gets into the front passenger seat and the car backs into the same spot then pulls forward and looks as if it rolls over something. Because of a sign hanging from the ceiling of the garage the view of the victim laying on the ground is blocked however the only item on the ground that would have caused the vehicle to jump up was the victim.

Items strewn on the ground between the parked cars, to include a cell phone (later identified as Cross's), showed that a struggle may have occurred. It should be noted that surveillance video revealed that one of the suspects appears to walk to and from the Toyota Camry while speaking on a cell phone just prior to the homicide.

The victim had 2 gunshot wounds to his head. One wound to his face had stipling around it which indicates a shot from close proximity, the 2nd wound was centered on the back of his head. Both wounds indicate the suspect shot the victim at close range. A semi-automatic handgun was found on the victim at the scene.

Surveillance footage captured the license plate of the Toyota Camry as FN8-G6J MO. The plate came back to a 2016 Toyota Camry rented from Enterprise Leasing. The name of the renter was Travon Cross, BM, 11-28-1991 with an address of 16 E. 34th Terrace, Kansas City, Jackson County, Missouri.

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CRN 16-97449

On 12-29-2016 at about 2100 hours, Kansas City police undercover units responded to the 16 E. 34th Terrace address and observed the Toyota Camry parked in front of the address.

In the morning of 12-30-2016, undercover units responded back to the Terrace address and placed the Camry under surveillance. At about 1030 hours, a black male was observed coming out of the address and getting into the vehicle. Tactical and undercover units converged on the vehicle and placed the driver who was identified as Travon Cross, BM, 11-28-1991 under arrest. At the time of his arrest Cross was asked if he had any weapons on him and he said no "But there is one in the car".

After obtaining a search warrant Cross's car was searched and an empty .32 caliber Ivers and Johnson 5 shot revolver with apparent blood on it was found in the center console. Five live .32 caliber rounds were found next to the gun. Crime scene investigation of Cross's car showed that the shooting occurred in the car with Hobby in the front passenger seat. Digital scales, the type commonly used to weigh drugs were found at the scene. Numerous commercial marijuana sales packages from Colorado were found inside Cross's car. During an interview with Cross's grandmother she mentioned that he made frequent trips to Colorado to buy marijuana then he brings it back and sells it. She also mentioned that he would associate with a half brother named "Marquis".

An interview was conducted with one of the victim's friends who said that he saw the victim prior to him going to the Plaza. At that time, the victim had been counting out a large sum of money and advised he was going to buy 4 ounces of Kush. The friend also saw 2 guns on the victim's lap, a semi-automatic and a revolver. Photos posted on the day of the homicide on the victim's Face Book page shows him inside his car with a revolver and semi-automatic handgun on his lap. The revolver appears to match the gun found in Cross's car. A bag of .32 caliber rounds was found inside the victim's car during processing. No money was found on the victim or in his car at the scene.

Text messages between the victim's phone and 816-456-0983 (which was identified as Travon Cross's number) shows them discussing the sale of 4 ounces of Kush.

Information was obtained from an anonymous TIP which named Marquis Henderson as the person who shot Ahkeem Hobby and that he had admitted to doing it.

A check of the police department data bases showed there to be a Marquis Henderson, BM, 6-18-1996. A comparison of the person talking on the phone and directing the victim's vehicle into the garage to the booking photo of Henderson appeared to be that of Henderson.

On 1-26-2018, Henderson was arrested and booked on stop orders for homicide and burglary.

On 1-27-2018, Marquis Henderson was interviewed. After waiving his rights Henderson stated that he set up a meeting between his brother Travon Cross, the victim Hobby, and he for the purpose of Cross to sell Hobby 3-4 ounces of marijuana for \$450-\$500.00. The meeting was set up to take place in the parking garage at the Kansas City Public Library - 4801 Main St - Henderson advised that prior to the transaction Cross gave him a handgun for protection. When Hobby arrived Hobby got into Cross's car in the front passenger seat. Henderson sat in the rear passenger seat behind Hobby

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and Cross was in the driver's seat. During the transaction between Cross and the victim, the victim pulled out a gun and attempted to rob Cross at which time Henderson stated he shot Hobby to defend Cross.

Printed Name Det. Daniel W. Frazier #5180 Signature /S/Det. Daniel W. Frazier #5180

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

Judge

Circuit Court of _____ County, State of Missouri.

State vs. Travon Cross

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5. [REDACTED]
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An interview was conducted with one of the victim's friends who said that he saw the victim prior to him going to the Plaza. At that time, the victim had been counting out a large sum of money and advised he was going to buy 4 ounces of Kush. The friend also saw 2 guns on the victim's lap, a semi-automatic and a revolver. Photos posted on the day of the homicide on the victim's Face Book page shows him inside his car with a revolver and semi-automatic handgun on his lap. The revolver appears to match the gun found in Cross's car. A bag of .32 caliber rounds was found inside the victim's car during processing. No money was found on the victim or in his car at the scene.

Text messages between the victim's phone and 816-456-0983 (which was identified as Travon Cross's number) shows them discussing the sale of 4 ounces of Kush.

On 1-27-2018, a second subject was questioned. Marquis Henderson, brother to Cross. He stated that he set up a meeting between him, his brother Travon Cross and Hobby for the purpose of Cross selling 3-4 ounces of marijuana to Hobby for \$450-\$500.00. He said that during the transaction between Cross and the victim, the victim pulled out a gun and attempted to rob Cross. Henderson admitted to shooting the victim in defense of Cross.

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During his interrogation Cross was asked to explain what happened at the shooting. He said “I know my part in it and I didn’t do anything.” When he was told that the shooting was on video he said “That’s why I’d rather take my chances, you can see the whole text but you don’t know the meaning behind it”. When asked about the person who was with him he said he didn’t want to talk about that because people get labled. When questioned further he requested an attorney.

Printed Name Det. Daniel Frazier #5180

Signature /s/ Det. Daniel Frazier #5180

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

Judge

Circuit Court of _____ County, State of Missouri.