

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	20-053302
PROSECUTOR NO. :	095460332
OCN:	qo003876

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
LARNELL MCDONALD)	
3753 Flora Ave)	CASE NO. 2016-CR
Kansas City, MO 64109)	DIVISION
DOB: 11/10/1956)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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 August 16, 2020, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Kimah McDonald 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 (571.015-001Y19755212.0)

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 16, 2020, in the County of Jackson, State of

State vs. Larnell McDonald

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 and 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 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/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4488
hwilliams@jacksongov.org

WITNESSES:

1. [REDACTED], MO 64050
2. PO Gabriel Coale, 223 N. Memorial Drive, Independence, MO 64050
3. DET Stephen Cook, 223 N. Memorial Drive, Independence, MO 64050
4. PO Lacy Gipson, 223 N. Memorial Drive, Independence, MO 64050
5. PO Raymond Osenbaugh, 223 N. Memorial Drive, Independence, MO 64050
6. PO Robert Romey, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 8/17/2020

Report #: 20-53302

I, Steve Cook, 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 8-16-20, at 2142 hours, Larnell McDonald, (Race- B, Sex- M, DOB- 11-10-56, Address-2620 S. Arlington Avenue, Independence, MO. 64052, [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 08/16/2020 at approximately 2142 hours, Officers with the Independence Police Department responded to 2620 S. Arlington Avenue in reference to a verbal domestic.

While responding, Dispatch advised that Kimah McDonald texted her brother advising her husband, Larnell McDonald, was threatening her and requesting that he send Police to her residence.

Upon arrival, Officer Osenbaugh and Officer Gipson approached the residence during which time they heard a single gunshot that sounded like it came from behind the residence. The shot was muffled and officers were unable to determine if it came from inside or behind the residence.

Sergeant Romey arrived on scene and an approach team was established. Officers made their approach. A position was established on the northeast corner of the residence. While holding the position, dispatch advised Larnell McDonald had called 911 and stated he needed officers at his residence.

Sergeant Romey then began giving verbal commands to the occupants of the residence to exit. A short time later, Larnell McDonald exited the front of the residence and was detained. McDonald was asked, if anyone else was inside. He stated a female, and the gun accidentally went off. When asked if his wife, Kimah McDonald, was ok, Larnell stated "no".

Officers cleared the residence and located Kimah lying in bed in the upstairs master bedroom with a large amount of blood on her head, pillow and bedding. Officers moved Kimah to the floor to perform CPR and observed at that time that Kimah had a gunshot wound to the forehead and no pulse. The residence was secured for application of a search warrant.

Detective Cook responded to the scene and made contact with Kimah's brother [REDACTED] who showed Detective Cook several text messages between Kimah and [REDACTED]. The first message from Kimah was at 2139 hours and said "Call the Police and send them to my address. Wink is threatening me. 2620 S. Arlington Ave. He told me when I go to sleep I better lock my door". [REDACTED] advised that Kimah and Larnell McDonald had talked about separating over the past few months. [REDACTED] further advised that Larnell McDonald goes by the nickname "Wink".

After the search warrant was obtained and executed a Canik TP9SF 9mm serial #20AT20939 was recovered from the upstairs master bedroom floor. A single 9mm shell casing was located and recovered from the top of the headboard for the bed.

On 8-17-20 at approximately 0139 hours, Detective Cook conducted an interview with Larnell McDonald. Prior to the interview taking place McDonald was read his Miranda Rights. McDonald did advise that he understood his rights and signed the Warning of Rights form.

McDonald was asked what had occurred between him and the victim resulting in the Police being called to his residence. McDonald replied “Gun went off”. McDonald also acknowledged that he and the victim were getting separated and that there had been an argument but could not advise what the argument was over.

McDonald was asked about the firearm that he owned and he advised that it was a black 9mm semi-automatic and that he has had it for a month or two. McDonald was asked where he had obtained the firearm and he advised that he bought it from the Bullet Hole.

At that time Detective Cook asked McDonald directly if he had intended to shoot the victim. McDonald shook his head no and stated “It just went off”.

McDonald was then asked where the victim had been when the incident occurred. McDonald advised that she had been sitting on the bed. McDonald was asked what he did with the gun after he shot the victim and he advised that he “just dropped it”.

Detective Cook then asked McDonald if he knew why he had pointed the gun at the victim. McDonald advised that it was probably just the heat of the moment and stated “I shouldn’t have did it”. McDonald also advised that the gun was already loaded when he picked it up.

Detective Cook did attempt to get McDonald to demonstrate how the shooting occurred and to tell him if he is left or right handed. McDonald advised that he is left handed. McDonald would not demonstrate but did state “It was loaded, I pointed a gun and it went off, that’s all I can say”.

Detective Steve Cook

/s/Detective Steve Cook-879

Print Name

Signature