

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	22-057450
PROSECUTOR NO. :	095471010
OCN:	QO009242

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JAYVON D. RABB)	
1406 S. Harris Ave)	CASE NO. 2216-CR
Independence, MO 64052)	DIVISION
DOB: 08/21/1999)	
Race/Sex: B/M)	
[REDACTED])	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

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 21, 2022, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of [REDACTED] 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 (571.015-001Y20205299.0)

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 21, 2022, in the County of Jackson, State of

State vs. Jayvon D. Rabb

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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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.

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/ Traci A. Stansell
Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4591
truppstansell@jacksongov.org

State vs. Jayvon D. Rabb

WITNESSES:

1. DET Steven Breshears, 223 N. Memorial Drive, Independence, MO 64050
2. PO Stephen Counihan, 223 N. Memorial Dr., Independence, MO 64050
3. SGT Terry Dorman, 223 N. Memorial Drive, Independence, MO 64050
4. SGT Scott Durst, 223 N. Memorial Drive, Independence, MO 64050
5. [REDACTED], [REDACTED]
6. DET Emily Knox, 223 N. Memorial Drive, Independence, MO 64050
7. [REDACTED]
8. DET Scott Mckee, 223 N. Memorial Drive, Independence, MO 64050
9. DET Jeffery Pagel, 223 N. Memorial Drive, Independence, MO 64050
10. DET John Roach, 223 N. Memorial Drive, Independence, MO 64050
11. DET Steven Schmidli, 223 N. Memorial Drive, Independence, MO 64050
12. [REDACTED]

PROBABLE CAUSE STATEMENT

Date: 8-22-2022

Report: #2022-57450

I, Steven D. Schmidli, 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 8-21-2022 at about 1930 hrs., Jayvon D. Rabb (Race – B, Sex - M, DOB: 8-21-99, [REDACTED], Last Known Address: 1406 S. Harris, Independence MO 64052) Committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this believe are as follows:

That on 8-21-2022 at about 1930 hrs., the Defendant, Jayvon D. Rabb knowingly shot and killed Deionate J. Hair (dob: 5-3-2001) near the intersection of 14th Street and Scott which is located in the Hudson Apartment Complex. This offense occurred in Independence, Jackson County MO.

On 8-21-2022 at approximately 1930 hrs., Independence MO Police were dispatched to 11415 E. 14th St. in reference to shots fired in the area. Shortly after officers arrived on scene, two black male subjects were found deceased from apparent gun shot wounds. One of the male victims was located was lying in the street near the intersection of 14th and Scott while the other victim was located inside of a wrecked black sedan near the intersection of 14th and Cunningham. Responding officers located three separate crime scenes along 14th Street between Leoti and Cunningham where numerous spent shell casings were observed on the ground.

Sgt. Terry Dorman was the first officer to arrive on scene. He was immediately directed by witnesses to the address of 11323 E. 14th St. As Sgt. Dorman drove towards the address, he observed a black Chevrolet Cruze parked directly in front of the residence. He observed the vehicle to have four subjects milling around the vehicle. He approached the vehicle and immediately gave verbal commands to three black male subjects and one black female subject. Sgt. Dorman stated two of the male appeared to be getting ready to enter 11323 E. 14th St, and the third male was walking in front of 11321 E. 14th St. where he attempted to hide a handgun underneath a BBQ grill in front of the residence. All three males were detained as part of the patrol investigation along with the black female. Sgt. Dorman observed at least two handguns inside the black Chevrolet Cruze in plain view in the back seat of the car. Several shell casings were located in the intersection of 14th and Leoti which is close proximity to the above mentioned residence. The three black male subjects were identified as Jayvon Rabb, [REDACTED], [REDACTED] and [REDACTED]. The black female was identified as [REDACTED]. Mr. Rabb was wearing a white tank top and stone washed jeans with holes in them. The crime scene at 11323 E. 14th St. was surrounded by officers and formal police

announcements were made for any additional subjects to exit the duplex. Two black male subjects exited the residence and were detained as part of the patrol investigation. The two black male subjects were identified as [REDACTED] and [REDACTED].

The secondary crime scene was located directly east from Leoti and at the intersection of 14th and Scott which is inside the Hudson Apartment Complex. A deceased black male subject was found on the ground near a black Ford Edge SUV which had reported as stolen. The deceased black male had been shot several times. Numerous shell casings littered the intersection near the black SUV. This crime scene was secured and protected by responding officers.

The third crime scene was located directly east from Scott and near the intersection of 14th and Cunningham which is inside the Hudson Apartment Complex. Responding officers observed multiple cars that had been parked along and on the south side of 14th Street just west of Cunningham to have been completely destroyed by a black Chevrolet Malibu which was also extremely damaged from the violent collision. Inside the Chevrolet Malibu was a deceased black male subject whom also appeared to have been shot. Bullet holes were observed on the drivers side of this vehicle. A handgun was also observed in this vehicle. This crime scene was secured and protected by responding officers. IPD Detectives and Crime Scene personnel arrived on scene and began processing the crime scene for evidence. The five black male subjects and the one black female subject were transported to IPD Headquarters for formal statements on the incident. The Jackson County Medical Examiner's Office responded and recovered the bodies of the two victims. The Chevrolet Cruze, the Ford Edge and the Chevrolet Malibu were secured and towed to the IPD Canine Unit for evidence purposes.

Det. Steve Schmidli and Det. Steve Breshears attempted to interview Mr. Jayvon Rabb about the shooting. After being advised of his rights, he denied any involvement in the incident. Mr. Rabb was escorted to detention and placed on an investigative hold regarding this homicide investigation.

On 8-22-2022, Det. Schmidli responded to the body examinations of the two black male victims at the Jackson County Medical Examiner's Office. The shooting victim from 14th and Scott was identified as Deionate J. Hair (dob: 5-3-2001) and had four gunshot wounds to the left side of his upper body. The victim from the wrecked Chevrolet Malibu had been shot twice, once in the left side of head and once in the upper back. This victim was determined to be a juvenile and identified as [REDACTED] (dob: 9-16-2005).

On 8-22-2022, Det. Jeff Pagel, Det. John Roach Det. McKee and Det. Emily Knox conducted a neighborhood canvas around 14th and Scott and contacted three separate witnesses to the shooting incident at that intersection. Det. Pagel spoke with a [REDACTED] who resides at [REDACTED] [REDACTED] advised that on 8-21-2022, he was inside his residence and heard shots being fired outside. He stated that when he looked out his window and observed three black males standing on the west side of the intersection of 14th and Scott. Mr. Woodson advised one of the males had dreads, a white tank top, stone washed jeans with holes in them and was carrying a silver handgun. Mr. Woodson described the other

two males as wearing white t-shirts, one with dark pants or jeans, and the other with blue shorts. ██████ stated he observed the black male with the silver handgun fire a shot at a black SUV parked on the east side of the intersection of 14th and Scott. He stated that when he looked in the direction of the SUV, he observed a male in a dark hoodie lying face down in front of the vehicle. ██████ advised that all three males then quickly “skipped” down the road to the east. He advised that at the time, he did not know another vehicle had been involved in an accident but believes the black males were running towards that vehicle. He stated that within a few minutes he observed the same three black males approach the male victim that was laying on the ground in front of the black SUV. He advised the black male with the silver handgun (wearing dreads, stone washed jeans) walked up to the male victim on the ground and shouted, “Who sent you!”. He stated the male with the silver gun then physically spit on the victim and proceeded to shoot him three times. He stated the black males then fled area back westbound on 14th Street. A field photo lineup was created which contained a picture of Mr. Jayvon Rabb and presented to ██████ by Det. Pagel. ██████ immediately selected picture number 5, of Mr. Rabb as the shooting suspect in the death of Deionate J. Hair.

Det. John Roach conducted a field interview with ██████ in reference to the shooting homicide at 14th and Scott. ██████ advised he lives at ██████ with his girlfriend, Cheyenne Hink. He stated he and his family had just sat down for dinner when they heard forty or fifty “popping” noises and what sounded like automatic gunfire. ██████ advised when he walked out onto his apartment balcony, he saw a black sedan at the corner of 14th and Scott. He stated he observed a black male laying in the street in front of the sedan. He advised that he walked down the steps toward the subject on the ground and observed him to be breathing. He noted that he was wearing a black face mask. He observed three black males walk up to the subject on the ground from the east. ██████ described the shooter was wearing a white t-shirt with ripped jeans and had short dreads. He advised the shooting suspect lowered the victim’s face mask and began asking the victim on the ground “who are you, who sent you”. He stated that the “shooter” then spat on the victim and fired three shots into the victim. He advised that after the shooting the “shooter” looked around and realized the entire apartment complex was watching them and took off running westbound down the street. ██████ was shown a field photo lineup and immediately selected photo number 5 of Jayvon Rabb as the shooter and stated he was “100% positive” on his selection.

Det. Scott McKee contacted ██████ at ██████. ██████ advised that while standing outside of her residence last night (8-21-22), she observed a black male with dreadlock hair, wearing a white tank top and jeans fire shots at another male that was on the ground. She advised the male on the ground had possibly already been injured and was wearing a face mask. ██████ advised the male with dreads was carrying a gun, approached the male on the ground and pulled his mask off his face. She stated he then asked the male on the ground, “Who sent you?” She advised the male with the dreads then shot the guy on the ground three times. ██████ was later provided a field photo lineup by Det. Emily Knox and immediately identified as Jayvon Rabb as the shooting suspect of Deionate Hair.

On 8-22-22 at about 1600 hrs., Det. Steve Cook conducted a second interview with Jayvon Rabb regarding him being identified by independent witnesses as the shooter of Deionate Hair. After being advised of his rights, Mr. Rabb initially gave the [REDACTED] story about not being involved in the incident. Det. Cook confronted Mr. Rabb with the facts of the investigation at which time, he admitted that he had went down the street after hearing the shots being fired and was in possession of a Glock 30. Mr. Rabb observed a vehicle that had been flipped on its side. He advised that he also saw a subject on the ground in front of a truck and was pissed off. Mr. Rabb admitted that he had pulled his gun and had fired his handgun at the victim while he was lying on the ground.

Det. Steve Schmidli #842

/s/ Steve Schmidli

Print Name

Signature