

**IN THE CIRCUIT COURT
OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

Police# 16-094596
Prosecutor# 095436849
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Drevon U. Davis
10608 E. 42nd St. #F
Kansas City, MO 64129
DOB: 10/03/1999; Race/Sex: B/M;
SS#

Defendant.

Count I. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841399.0)

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 December 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] 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 December 21, 2016, 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. Attempted Robbery 1st Degree (569.020-001Y19791299.1)

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, charges that the defendant in violation of Section 564.011, RSMo, committed the class B felony of attempted robbery in the first degree punishable upon conviction under Sections 564.011, and 558.011, and 560.011, RSMo, in that on or about December 21, 2016, in the County of Jackson, State of Missouri, the defendant threatened [REDACTED] with a deadly weapon by pointing a gun at her while telling her to get out of the car, and such conduct was a substantial step toward the commission of the crime of robbery in the first degree, and was done for the purpose of committing such robbery in the first degree.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. 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 December 21, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of attempted 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 attempted robbery 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.

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.

THE STATE OF MISSOURI

vs.

Drevon U. Davis

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

JoEllen F. Engelbart (#68047)
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WITNESSES:

PO Jeffrey Buck , 223 N. Memorial Drive, Independence, MO 64050

DET Jason Clancy , 223 N. Memorial Drive, Independence, MO 64050

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PO Brian Weiter , 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 12/22/2016

Report #: 16-94596

I, Jason Clancy, 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 12/21/2016, at 2228 hours, Drevon U. Davis, (Race- black, Sex- male, DOB- 10/03/1999, Address-10608 E 42nd St #F Kansas City MO 64129, SSN- unknown) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 12/21/2016 at 2232 hours Independence, Missouri, Police Officers responded to the area of the Burlington Coat Factory, 11910 E 40 Hwy, Independence, Jackson County, Missouri, to investigate a shooting. Prior to the officer's arrival, Sgt. Zarrillo with the Jackson County, Missouri, Sheriff's Department, located [REDACTED] [REDACTED], a white female, born 04/04/1980, on 40 Hwy under I-70. Ms. [REDACTED] told Sgt. Zarrillo that she was just approached by three black males and was shot in the chest when two of them attempted to "carjack" her as she sat in her 2006 Audi A6, bearing Missouri license CL7-V0H, while parked in the Burlington Coat Factory parking lot. Ms. [REDACTED] was transported to Centerpoint Hospital for medical attention.

During the investigation Independence Police Officers viewed Burlington Coat Factory's surveillance video and saw three black males walk to the front entry of the store. One of the black males was wearing a blue sweatshirt with a KU logo on the front, blue jeans, and a red and yellow "Chiefs" stocking cap with a tassel on top. A second black male was wearing a red hooded sweatshirt with an unknown design on the front, and a third black male was wearing a black hooded sweatshirt and black pants. The males could be seen walking towards the area of the parking lot where Ms. [REDACTED]'s vehicle was parked occupied by her. At approximately 2228 hours, according to the video, a flash of light occurred just as Ms. [REDACTED] drove off toward 40 Hwy. The three suspects were last seen running north through the parking lot.

Crime Scene Technician Kevin Phillips processed the scene of the shooting and located a spent 9mm shell casing in the area where [REDACTED] [REDACTED]'s car had been parked.

Detective Jason Clancy, with the Independence, Missouri Police Department, responded to the hospital and interviewed [REDACTED] [REDACTED]. [REDACTED] [REDACTED] described the three black males as they were seen on the video surveillance. She stated that they all appeared to be in their mid to late teens. She stated that a black male that was carrying a back pack approached her vehicle on the driver's side while a second black male approached the passenger side. Both black males were pointing black semi-automatic handguns at her and telling her to get out of the car. She said, "No." and the black male with the back pack fired one shot at her through her closed car window. She stated that she knew she had been shot in the chest so she immediately drove out of the parking lot onto 40 Hwy in order to get to a hospital but she was stopped by a Sheriff's Deputy.

On 12/22/16 at approximately 0252 hours Several Kansas City, Missouri, Police Officers, were dispatched to 10616 E 42nd St. to investigate suspicious parties that matched the suspect

description of the suspects from the shooting at the Burlington Coat Factory. Upon arrival they contacted Titan Security Guard Hoffman who advised he believed he located the suspects from the shooting at the Burlington Coat Factory. He received their description from officers who were conducting an area search immediately after the shooting. Mr. Hoffman stated that he was conducting his patrol assignment when he located three individuals that matched the suspect descriptions in a common area of 10616 E 42nd St. He then called the Kansas City Officers who conducted pedestrian checks. The males were on a stair case next to a back pack and several articles of clothing. Upon contacting the males the officers obtained consent to search through the clothing on the stair case as well as the back pack. KCPD Officer Herman searched the backpack and found a black Springfield XD 9mm pistol. He also located a black Jimenez brand 9mm pistol that was located under an "American Eagle" brand hooded sweatshirt. One of the males was identified as Drevon U. Davis, a black male, born 10/03/1999. Mr. Davis had a blue "Kansas University" hooded sweatshirt and a red and yellow "Chiefs" stocking cap with a tassel on top, the clothing that matched exactly what the suspect was wearing in the surveillance video of the shooting. A juvenile identified as B.C., born 7/6/2001, was seen wearing the red "American Eagle" sweatshirt by the security guard when he initially located them in the apartment. The red sweatshirt matched the suspect clothing in the video surveillance of the shooting. The third black male did not match the physical description of the third suspect.

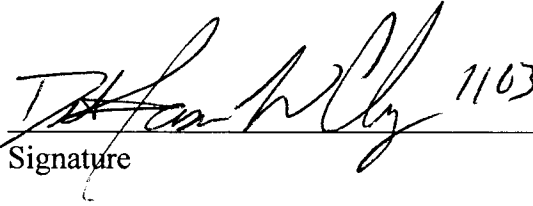
A computer check on the Springfield XD 9 mm revealed that the gun had been reported to be stolen out of Kansas City on 10/14/16. It was taken in conjunction with a stolen auto when a red, 2012 Ford Fusion, bearing Missouri License U18-M1R, (VIN 3FAHP0HG3CR341967) which was stolen from 10521 E 43rd St, Kansas City, MO (KCPD #16-77067). A computer check on the Jimenez 9 mm was also reported to be stolen out of Kansas City, Missouri on 4/1/2014 (KCPD #14-21436). Mr. Davis was arrested by KCPD officers for unlawful use of a weapon and transported to KCPD East Patrol. Mr. Davis was also found to be in possession of a key to a Nissan Maxima. The key chain had the VIN (1N4AA6AP7HC367493) and a computer check revealed that it was a stolen auto taken out of Independence a few moments after the shooting occurred. The Nissan was located in the parking lot of 10620 E 42nd St and it was confirmed to be the car stolen moments after the shooting (IPD #16-94600).

On 12/22/16 at 0953 hours Detective Clancy responded to KCPD East Patrol to interview Mr. Davis regarding the shooting. After Detective Clancy advised Mr. Davis of his rights under Miranda, Mr. Davis stated that he knew he was being questioned about the shooting at the Burlington Coat Factory. Mr. Davis stated that he, the juvenile suspect, and a third party that he would not name, went to the store with the intention to car jack someone. He stated that he got ripped off earlier in the day when he was selling a cell phone and he wanted to find the man that stole the phone and shoot him. He stated that while they were waiting for a car to steal he noticed that the victim had been sitting in the parking lot for about 20 minutes. Mr. Davis stated that he wanted the Audi that the victim was in so he and the juvenile suspect approached the car. Mr. Davis confronted the victim on the driver's side of the car and tapped the window with the muzzle of the Springfield XD pistol. He told the victim to get out but she said, "No" and started to reach for something in the car. He thought she was reaching for a gun so he shot through the window toward the passenger seat. At that point the victim was able to get the car started and quickly drive away leading him to believe he missed her. Mr. Davis stated that the three of them then fled the scene and about 20 minutes later they stole a black Nissan. Mr. Davis stated that

they drove to Raytown for a while and then went home. When they were located by the security guard Mr. Davis had the gun used in the shooting in the waistband of his pants but before the police contacted him, he placed it in the back pack. Also during the interview Mr. Davis stated that he had also been responsible for doing another carjacking at the Burlington Coat Factory in November. (IPD #16-87543 on 11/19/2016). Mr. Davis stated that he has also attempted several other carjacking at the Walmart located in Kansas City as well as several stolen autos and numerous car larcenies.

Det. Jason W. Clancy-1103

Print Name

 1103

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge