

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

POLICE NO. :	17-004194
PROSECUTOR NO. :	095437369

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
ERIC B. MARQUEZ)	
2540 Lister Ave.,)	CASE NO. 1716-CR
Kansas City, MO 64128)	DIVISION
DOB: 10/27/1991)	
Race/Sex: W/M;)	
SSN: [REDACTED])	
)	DEFENDANT.
)	<u>COMPLAINT</u>

Count I. Abandonment Of A Corpse (194.425-001Y20175599.0)

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, charges that the defendant, in violation of Section 194.425, RSMo, committed the **Class E Felony of Abandonment of a Corpse**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 17, 2017, in the County of Jackson, State of Missouri, the defendant was the boyfriend of Brenda Vera, and knowingly left the corpse of Brenda Vera in the passenger seat of a gray Nissan pick-up truck parked in the driveway of 2540 Lister Ave., without properly reporting the location of the body to the proper law enforcement officials.

Count II. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **Class D Felony of Unlawful Possession of a Firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about January 17, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed a handgun capable of firing .40 caliber ammunition, a firearm, and on June 21, 2016, the defendant was convicted of the felony of possession of a controlled substance in the Circuit Court of Jackson County Missouri under court case number 1516-CR03059-01.

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.

PROBABLE CAUSE STATEMENT FORM

Date: 01/24/2017

CRN: 17-004194

I, Det. Brent Taney#4641 (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 01/17/2017, at 2540 Lister Ave. in (Date) (Address)

Kansas City, Jackson County Missouri Eric "Brandon" Marquez (County) (Name of Offender(s))

W/M, 10/27/1991 (Description of Identity) committed one or more criminal offense(s).

Felony Murder/Abandonment of Corpse/ FIP/ Stolen Auto

The facts supporting this belief are as follows:

On 01/17/2017 at 1803 hours, Officers of the Kansas City Missouri Police Department were dispatched to 2540 Lister Avenue, Kansas City Jackson County, Missouri in regard to a shooting. Upon arrival, Officers were contacted by a Bail Bondsman, called to the scene by the suspect's family, who informed Officers a female was shot in the passenger seat of a pick-up truck. The Bondsman further stated the suspect was inside the residence, possibly armed with a gun. Officers located the victim, deceased, in the front passenger seat of a gray, Nissan, pick-up truck, parked in the driveway of 2540 Lister Avenue. The victim was determined to be the suspect's girlfriend and mother of the suspect's child. Officers set up a perimeter around the residence, an operation 100 was initiated and a search warrant was obtained for the residence. The suspect's family was contacted at the scene, debriefed by the Hostage Negotiator and escorted to Police Headquarters to provide statements.

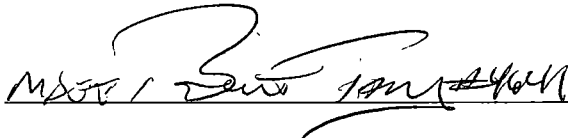
The suspect's mother stated her son, Eric "Brandon" Marquez, W/M, 10/27/1991, called her on 01/17/2017 around 0100 hours, upset and told her he wanted to commit suicide. Marquez's mother stated she left for work on 01/17/2017 around 0600 hours and Marquez had not returned home. Marquez's mother stated she attempted to call Marquez and the victim several times throughout the day with negative results. Marquez's mother stated she returned home after work, concerned for Marquez and located him inside the residence. Marquez informed his mother he accidentally shot the victim during a road rage altercation after he struck a vehicle and the vehicle owner pulled a gun on him. Marquez's brother stated he received a phone call from his step-mother who stated she was concerned for the suspect and asked he respond to 2540 Lister. Marquez's brother stated he responded to the residence, observed the suspect inside his bedroom with the door locked. Concerned the suspect may have committed suicide; he forced the bedroom door open and located the suspect on the bed. The suspect informed his brother he accidentally shot the victim during a road rage incident. The suspect informed his brother an altercation ensued after he struck the vehicle and the vehicle owner pulled a gun on him. The suspect informed his brother, he pulled his gun, shot back at the vehicle owner and accidentally shot his girlfriend, the victim.

Tactical Response Officers made entry into 2540 Lister and did not locate the suspect inside. The victim was located in the front passenger seat of a gray, 2004 Nissan Titan, pick-up truck, deceased from an apparent homicide. A computer check of the vehicle identification number revealed it to be stolen from Kansas City, Kansas. The location and time of the homicide are unknown.

PROBABLE CAUSE STATEMENT FORM

CRN 17-004194

A computer check of the suspect revealed Marquez is a convicted felon out of Jackson County Missouri for possession of a controlled substance under Jackson County Circuit Court Case Number 1516CR03059-01. In addition, Marquez is a convicted felon out of Allen County, Kansas for possession of a controlled substance under court case number 14CR119.

Printed Name Det. Brent Taney#4641 Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.