


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

<b>POLICE NO. :</b>	18-008645
<b>PROSECUTOR NO. :</b>	095448795
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>DEION D CRUM</b>	)	
<b>1330 E89th Street #2E</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64131</b>	)	<b>DIVISION</b>
<b>DOB: 09/29/1996</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	<b>DEFENDANT.</b>	)

**COMPLAINT**

**Count I. Murder 1st Degree (565.020-001Y19840903.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about February 4, 2018, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Jacob Skowronski by shooting him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

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**OR IN THE ALTERNATIVE**

**COUNT I: Murder in the Second Degree 565.021-001Y19840903.0**

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 February 4, 2018, in the County of Jackson, State of Missouri, the defendant, knowingly caused the death of Jacob Skowronski by shooting him, and defendant is further given notice that should the State submit murder in the second degree-felony under section 565.021.1(2) RSMo 2000, it will be based on the death of Jacob Skowronski as a result of the perpetration of robbery in the first degree under Section 570.023, RSMo committed by the defendant, on or about February 4, 2018, in the County of Jackson, State of Missouri.

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 (571.015-001Y19755213.0)**

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 February 4, 2018, in the County of Jackson, State of Missouri, the defendant

committed the felony of first degree murder charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of first degree murder 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to

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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. Robbery - 1st Degree (570.023-001Y20171207.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about February 4, 2018, in the County of Jackson, State of Missouri, the defendant forcibly stole marijuana owned by Jacob Skowronski, and in the course thereof defendant was armed with a deadly weapon.

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 IV. Armed Criminal Action (571.015-001Y19755213.0)**

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 February 4, 2018, in the County of Jackson, State of Missouri, the defendant

committed the felony of robbery in the first degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. 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.

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**Count V. Possession Of Controlled Substance Except 35 Grams Or Less Of  
Marijuana/synthetic Cannabinoid (579.015-001Y20173522.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.015, RSMo, committed the **class D felony of possession of a controlled substance**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 22, 2018, in the County of Jackson, State of Missouri, the defendant knowingly possessed oxycodone, a controlled substance, knowing of its presence and nature.

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Jennifer S Tatum  
Jennifer S Tatum (#70789)  
Assistant Prosecuting Attorney  
415 E. 12th Street  
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Kansas City, MO 64106  
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jtatum@jacksongov.org

**WITNESSES:**

1. PO Austin Bax, 1125 Locust, Kansas City, MO 64106
2. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
3. PO Michael Heard, 1125 Locust, Kansas City, MO 64106
4. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
5. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106

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6. PO Dylan Pifer, 1125 Locust, Kansas City, MO
7. DET James H. Price, 1125 Locust, Kansas City, MO 64106
8. Jacob Skowronski, 9804 Hedges Ave #1 - C, Kansas City, MO 64134
9. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 10/11/2018

CRN: 18-13085

I, Detective Nathan VanVickle #5169, Kansas City Missouri Police Department (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 02/04/2018, at 9804 Hedges Ave #1-C in (Date) (Address)

Kansas City, Jackson Missouri Deion D. Crum (County) (Name of Offender(s))

B/M 09-29-1996 committed one or more criminal offense(s). (Description of Identity)

- Homicide
Armed Criminal Action
Robbery

The facts supporting this belief are as follows:

On 02/04/2018 at 1700 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 9804 Hedges Avenue #1-C Kansas City, Jackson County, Missouri on a Dead Body.

Upon arrival they discovered the victim to be deceased inside 9804 Hedges Avenue Apt. #1C from an apparent gunshot wound to his head. It appeared that the victim was lying on the ground with his hands under his forehead as if he had been lying on the ground when he was shot.

Detectives interviewed the victim's parents who found the victim. The parents advised that there were no signs of forced entry into the apartment when they went into the apartment to check on the victim.

Crime scene responded and processed the scene for evidence, and recovered two spent Federal .45 auto shell casings. The victim was transported to the Jackson County Medical Examiner's Office where they determined the cause of death to be multiple gunshot wounds to the head.

During the investigation an area canvass was completed. During the area canvass, the occupant of 3-C was contacted. Her apartment shared a wall with the victim's apartment. As the investigation continued the victim's phone was examined and messages were discovered from several phone numbers. One of the Phone numbers, 816-491-0275 was determined to be Deion Crum B/M 09/29/1996 who is the son of who lives at 9804 Hedges #3-C.

While going through the victim's phone it was determined by reading messages that he had just gone to Colorado and had just returned on 02/02/2018. From the messages it is believed that the trip was to bring back

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marijuana and other paraphernalia items. In the phone there was also a photo of what appeared to be a larger Ziploc bag containing a green leaf like substance.

The Apartment Complex located at 9804 Hedges is a gated entry into the parking lot. There were no instances where the victim had keyed into the gate or entered a code after arriving back at his residence, prior to being discovered in his apartment, which indicates that he did not key card or buzz anyone else in.

One set of messages on the victim's phone to **Crum** was the victim saying on 02/01/2018 that he was leaving for home, **Crum** asking "did you grab sum". The victim tells him "yes, do you want to link up later". Which **Crum** replies "lmk (let me know)". On 2/2 the victim messages **Crum** that he is finally home now.

A contact and advise was issued for **Deion Crum**, who was one of the last people to talk to the victim, and who had access to the apartment building without the victim buzzing him in. On 02/22/2018 **Crum** was arrested at 1330 E. 89<sup>th</sup> St. for outstanding warrants and transported to Police Headquarters for questioning.

Prior to being transported to Police Headquarters **Crum** and the Female occupant of the residence gave consent to search the apartment. Upon searching the apartment, Officers located a box of Federal .45 auto ammunition with a Walmart receipt next to it, a Ziploc vacuum seal bag with green leafy residue, iPuff smoking 'rit with residue, and a glass jar with what appeared to be THC wax residue, and 15 green pills that were identified as Oxycodone.

**Crum** was advised of his Miranda Rights and stated he would talk with Detectives and stated the following: He met the victim about a year ago, and they were friends. **Crum** went over to the victim's apartment occasionally to smoke marijuana and make music with the recording setup the victim had. **Crum** stated he has seen marijuana plants growing at the Victim's apartment but said they were in the seed stage. He stated that he always knew the victim to keep his door locked and would knock or call when he would go over there.

**Crum** stated the 15 green pills were Oxycodone and they were his that he received from a friend. **Crum** finally admitted to knowing the victim was going to Colorado for Marijuana and said Percocet is cheaper, and it is the same thing as the oxycodone that was found in the closet he was hiding in at the time of his arrest. **Crum** stated the oxycodone, which was a green round pill imprinted with the number "4811" was his and he got it from a friend for back pain that he has.

**Crum** was asked about the (10) .45 Auto live ammunition also located in the apartment. At first, **Crum** stated his cousin had left the ammunition at his house and later identified his cousin as "Damien Wells". Damien Wells was not located, however a Damien Franklin was located in the computer database and it was determined, "Damien Wells" on Facebook is Damien Franklin, BM 03/18/1992.

Once **Crum** was presented with the receipt of the purchase of ammunition from Walmart on State Line and possible video surveillance of the purchase, he admitted to buying the ammunition but still said it was for his cousin.

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During the interview with **Crum** he provided a buccal swab for a DNA standard. He further stated to Detectives that the Ziploc bag was his cousins and his DNA would not be on it. He stated the Ziploc bag was Franklins that he was keeping at his house along with the bullets.

Lab requests were entered for the spent shell casings to be compared to the live rounds that were recovered from where Crum was arrested. The lab determined The 45 Auto cartridge cases were both fired in the same firearm. No ejection marks could be seen on the ten 45 Auto cartridges that were recovered at the time Crum was arrested. There was a tool mark of unknown origin that was observed on the head stamp area of the cartridges and the spent cartridge cases. These tool marks were compared and it was determined that the two 45 Auto spent cartridge cases recovered from the crime scene and seven 45 Auto cartridges recovered from **Crum's**, exhibited a matching tool mark of unknown origin.

A representative with Federal Premium Ammunition was contacted and confirmed the rounds are plate loaded, which meant everything is lifted, pressed and set into a tray to load, and therefore should not have scratch marks along the head stamp of the rounds.


Lab requests were entered for the Ziploc bag to be tested for DNA which responded back with **Crum's** DNA and the victim's DNA included on the Ziploc bag.

Photos of the Ziploc bag that was recovered were taken and compared to photos of a Ziploc bag that the victim had on his phone from his trip to Colorado just prior to his death. The Ziploc bags were similar in appearance and size.

On 09/15/2018 Damien Franklin was picked up on a stop order. Upon being advised of his Miranda Rights, he stated he knew about the Homicide because of seeing it on the news, but he had no involvement in the Homicide. He stated the bag and ammunition that was recovered from Crum's apartment was not his, and he never had Crum purchase ammunition for him. During the interview Franklin gave consent for his buccal swab which was recovered.

Labs were requested for DNA on the Ziploc bag, be compared to Damien Franklin and came back excluding Franklin as a contributor of DNA on the bag.

Printed Name Detective Nathan VanVickle

Signature  #5169

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.