

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

POLICE NO. :	18-086057
PROSECUTOR NO. :	095449309
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
SANTAVION METCALF)	
3208 Quincy Dr., Apt #4)	CASE NO. 1816-CR
Kansas City, MO 64128)	DIVISION
DOB: 10/18/2001)	
Race/Sex: B/M)	
██████████)	
	DEFENDANT.)

COMPLAINT

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y19841304.0)**

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 September 3, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to ██████████ by shooting ██████████.

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. 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,

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committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about September 3, 2018, 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. 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.

Count III. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y19841304.0)

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 September 3, 2018, in the County of Jackson, State of Missouri, the defendant shot at [REDACTED], and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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. 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.

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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 September 3, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault 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 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. 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.

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/ Bryan O. Covinsky
Bryan O. Covinsky (#47132)
Assistant Prosecuting Attorney
415 E. 12th Street, Fl 7M
Kansas City, MO 64106
(816) 881-3368

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BCovinsky@jacksongov.org

WITNESSES:

1. [REDACTED] Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED] Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Jamie M. Frates, 1125 Locust, Kansas City, MO 64106
4. PO Benjamin M. Haskett, 1125 Locust, Kansas City, MO 64106
5. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
7. PO Blaine Kennedy, 1125 Locust, Kansas City, MO 64106
8. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
11. DET Angelina M. Sanchez,
12. PO Brandon E. Walker, 1125 Locust, Kansas City, MO 64106
13. DET Ian E. Winters, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09/04/2018

CRN: 18-68057

I, Det. Winters #5752
(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 09/04/2018, at 1125 Locust St. in
(Date) (Address)

Kansas City, Jackson Missouri Santavion Metcalf
(County) (Name of Offender(s))

B-M 10/18/2001 committed one or more criminal offense(s).
(Description of Identity)

Aggravated Assault
ACA

The facts supporting this belief are as follows:

On 09/03/2018 at 1705 hours, officers were dispatched to 3110 Prospect Ave. in regard to a shooting. The officers located 2 victims that had been shot, and both parties were transported to area hospitals in regard. Witness #1 identified **Metcalf, Santavion, B/M 10/18/2001** as the suspect.

Victim #1 was contacted at Children's Mercy Hospital. She stated on 09/03/2018, she was working at the Sun Fresh at 3110 Prospect Ave. bagging groceries. Victim #1 stated she was walking towards the front of the store to put away baskets when she heard two gunshots close by. Victim #1 ran to the back of the store to safety, at which time she realized she had been shot in her right thigh.

Victim #2 was contacted at Truman Medical Center. Victim #2 stated on 09/03/2018, he was at the Sun Fresh at 31st and Prospect Ave. to buy groceries for a family barbeque. Victim #2 stated family members were not answering his phone calls, so he did not know what to buy and he decided to leave. Victim #2 decided he should buy a drink before leaving, at which time he turned around and saw the suspect draw, point a gun at him, and shoot at him. Victim #2 stated he drew his 10mm Glock and returned fire in self-defense. The Victim stated he fell to the ground, after being shot, and told the people in the store to call an ambulance.

Witness #1 stated she is an employee of Sun Fresh, and was working in the front end as a cashier. She observed the suspect, **Metcalf**, walking around. Witness #1 knew **Metcalf** from attending school with him and being in the same grade. Witnesses #1 observed **Metcalf** shoot at Victim #2 several times. Witness #1 ran to the back of the store with Victim #1 who was shot in the leg, where she rendered first aid. Witness #1 provided the interviewing detective with the suspect's name and Facebook page with the name **Santavion Metcalf**.

Witness #2 stated on 09/03/2018, she was with her two young grandchildren. They had just finished shopping and were walking near the exit to the store. Witness #2 stated she observed a skinny B/M and heavysset B/M (Victim #2). Witness #2 stated she and her grandchildren were in between the two parties when she heard the two males briefly speak to each other. The two males drew handguns and began to shoot at each other. Victim

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#2 fell to the ground, while the suspect continued to shoot at him. Victim #2 returned fire while on the ground at which time the suspect fled from the store and ran northbound through the parking lot. Witness #2 left the area with her grandchildren and went to Center Patrol Station to report the incident.

Sun Fresh had video of the incident which showed **Metcalf** approach Victim #2, pull out a handgun, point it at Victim #2, and begin shooting at him. Video showed Victim #2 produce a handgun from his waistband, point it towards **Metcalf**, at which time he began to shoot back. Victim #2 fell to the floor near the entry doors, at which time **Metcalf** exits the store. Clear video of **Metcalf** was captured during the incident.

Printed Name Detective Ian Winters #5752 Signature Ian Winters #5752

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

Judge

Circuit Court of _____ County, State of Missouri.