

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

POLICE NO. :	19-003961
PROSECUTOR NO. :	095450347
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

DAKKOTA S. SIDERS

1311 W. Short Street

Independence, MO 64050

DOB: 12/29/1993

Race/Sex: B/M

DEFENDANT.)

COMPLAINT

Count I. Murder 2nd 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 January 16, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Barbra J Harper caused the death of Barbra J Harper by shooting her.

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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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 January 16, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, 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.

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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. 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 558.002 and 558.011, RSMo, in that on or about January 16, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Taurus 9mm handgun, a firearm, and on or about May 23, 2017 the defendant was convicted in the Circuit Court of Jackson County, Missouri, in case #1616-CR02868-01, of the felony of Possession of a Controlled Substance with Intent to Distribute.

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.

Count IV. 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 558.002 and 558.011, RSMo, in that on or about January 16, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Glock 9mm Handgun, a firearm, and on or about May 23, 2017 the defendant was convicted in the Circuit Court of Jackson County, Missouri, in case #1616-CR02868-01, of the felony of Possession of a Controlled Substance with Intent to Distribute.

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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.

Count V. 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 558.002 and 558.011, RSMo, in that on or about January 16, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a FHN 45 caliber handgun, a firearm, and on or about May 23, 2017 the defendant was convicted in the Circuit Court of Jackson County, Missouri, in case #1616-CR02868-01, of the felony of Possession of a Controlled Substance with Intent to Distribute.

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.

Count VI. Delivery Of Controlled Substance Except 35 Grams Or Less Of Marijuana Or Synthetic Cannabinoid (579.020-004Y20173562.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the **class C felony of delivery of a controlled substance**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 16, 2019, in the County of Jackson, State of Missouri, the defendant, with the intent to deliver knowingly possessed more than 35 grams of marijuana, a controlled substance, knowing of its presence and nature.

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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.

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**Count VII. Unlawful Use Of Weapon - Subsection 11 - Possess Weapon And A Felony
Controlled Substance (571.030-019Y20175299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class E felony of unlawful use of a weapon**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about January 16, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a FHN 45 caliber handgun, a firearm, while also possessing more than 35 grams of marijuana, a controlled substance, knowing of its presence and nature.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense. The range of punishment for a class E 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 four (4) 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/ Brady X. Twenter

Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
1315 Locust, 1st Floor
Kansas City, MO 64106
BTwenter@jacksongov.org

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WITNESSES:

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
2. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
3. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
4. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
5. PO Andy Keil, 1125 Locust, Kansas City, MO 64106
6. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
7. PO Jared Tipton, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01-16-2019

CRN: 19-3961

I, Detective Daniel Frazier # 5180

(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

I have probable cause to believe that on 01-16-2019, at I-70 West and I-35 North ramp in
(Date) (Address)

Kansas City, Jackson Missouri Dakkota Siders
(County) (Name of Offender(s))

B/M, 12-29-93 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 01/16/2019 at approximately 0306 hrs, Officers from the Kansas City Missouri Police Department were dispatched to I-70W west bound to the I-35 north entrance ramp, Kansas City, Jackson County, Missouri in regard to an injury accident with a party possibly deceased.

Upon arrival, officers observed the victim's vehicle, a white Toyota Corolla, had run off the road, on the east side of the highway into an embankment. Officer's observed the victim to be deceased, covered in blood and to be suffering from an apparent gunshot wound. The driver side window was broken, as well as the back passenger side window. Detectives also noticed holes in the passenger side headrest that appeared to be from gunfire. Two spent shell casings head-stamped "FC 9mm Luger" was located in the roadway near the victim's vehicle.

Detectives obtained surveillance video from city cameras and observed the victim's vehicle traveling west bound on I-70 going over Paseo Blvd at 0241:38 hrs when another vehicle is seen speeding up behind the victim's vehicle along the passenger side of the victim's car. Just after this vehicle approaches the victim's vehicle, the victim's vehicle is seen swerving and striking the guard rail ultimately coming to a stop where it is located at 0242 hrs. The vehicle which sped up behind the victim's vehicle exited north onto Harrison St from I-70 Hwy.

Detectives located further surveillance video at Kryger Glass Company which is located at 1221 Harrison St. Kansas City, Jackson County, Missouri which is at the base of the exit ramp from I-70W to Harrison St where the subject vehicle is seen exiting the highway. At 0242:10 in the Kryger video two shots can be heard via recorded audio and video cameras and seconds later, the subject vehicle which appears to be a light colored sedan with dark wheels and a blinker in the side view mirror is seen appearing at the intersection of E. 12th St and Harrison St. The subject vehicle turns east bound on E. 12th St. towards Troost Av. where it leaves camera views. Additional city cameras then capture a vehicle at a high rate of speed south bound on Troost Av towards Truman Rd at 0242:39 hrs.

Additional city camera review captures the vehicle which appears to be a silver vehicle with LED style headlights, turn east on Truman Rd from Troost at 0243:09 hrs. The vehicle continues east at Truman Rd and Lydia at 0243:21 hrs where you observe light colored vehicle with tinted windows and dark wheels. The vehicle continues eastbound on Truman Rd stopping at a red light at Paseo Blvd at 0243:41 hrs. At 0244:12 the same vehicle is captured on a License Plate Reader (LPR) located along Truman Rd and Woodland (The next block east of Truman Rd and Paseo Blvd) with the license plate of SN2M8K for MO on a light colored car.

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A check of police databases revealed the license plate responded back to a 2012 Kia Optima 4-door registered to Dakkota Shayne Siders B/M 12-29-1993 with an address of 1311 W. Short Av, Independence, Jackson County, MO. The vehicle continued eastbound on Truman Rd past Hardesty Av (0248:50) Av where it was no longer captured on camera. It should be noted that the victim's vehicle was observed via city camera getting on I-70 Hwy at Indiana ave (Blocks from where she works) at 0240:09 hrs 1 minute and 29 seconds before she is seen traveling westbound on I-70 at Paseo blvd.

On 01-16-2019 Officers from the Kansas City Missouri Police Department were conducting surveillance at the address listed on the license plate to the subject vehicle when the subject vehicle pulled into the driveway of the address and a black male, later confirmed to be Siders, exited the vehicle (which is described as a silver 4 door sedan with tinted windows and dark wheels) and went into 1311 West Short Av #B. A short time later Siders exited the house and began to enter the Kia at which time Officers approached the vehicle and arrested Siders. While arresting Siders, officers located a Taurus 9mm handgun in his waistband and a Glock 9mm handgun under his armpit. Siders also had a large quantity of cash and a black I-phone 10 in his possession. Siders was arrested and placed on a 24 hour investigative hold for homicide.

A search warrant was obtained for 1311 West Short Av from the Jackson County Courts (Division 27) allowing Detectives to search the residence for firearms, ammunition, spent ammunition, and authority to tow Siders vehicle for later processing. A search on the residence on 01-16-2019 revealed a FHN 45 caliber handgun, a bullet proof vests, 45 caliber ammunition, and approximately three pounds of marijuana in a black duffel bag along with numerous scales and sandwich baggies. Siders vehicle was towed to the city tow lot.

During the above investigation detectives were notified of an earlier disturbance involving shots fired on 01-16-2019 at 0239 hrs at the Shady Lady Strip Club located at 2800 E 12th St, Kansas City, Jackson County, MO (CRN 19-3965) where multiple shots were fired in front of the club. Officers responded to the location and recovered spent shell casings from the street which had a head-stamp of "FC 9mm Luger." An analysis by the crime lab revealed the spent 9mm shell casings recovered from the Shady Lady Club and the homicide scene were fired from the same gun.

Detectives responded to the Shady Lady and reviewed surveillance video from the time of the shooting which revealed a disturbance inside the club involving several males. Two white males are escorted out of the club. A black male and another white male are then also seen leaving. Outside video shows a black male, similar in appearance to the male seen leaving the club, quickly walk over to a silver vehicle and lean into the driver side. The male then walked towards the front of the business and out of camera view. Two white males are seen getting into the passenger side of the same vehicle. A short time later the black male is observed backing toward the vehicle and then firing a gun in the direction of the front of the business. While shooting you can see the black male has thick hair down his back. The male then enters the driver side of the vehicle and it drives off to the west. The video also shows at the same time on the opposite side of the club a white car exit the parking lot and travel at a high rate of speed west bound on 12th St. A witness contacted also advised that they observed three vehicles driving off after the shots were fired, one appeared to be a Lyft taxi service vehicle. A second witness stated he was a Lyft driver and he observed a white in color vehicle leaving the area at a high rate of speed after shots were fired.

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Siders was transported to Police Headquarters, advised of his Miranda rights and asked for a lawyer.

The Kansas City Missouri Crime Lab conducted an examination of the guns recovered off the suspect and determined the Taurus 9mm to be the gun that fired the shell casings recovered from the Shady Lady and the Homicide scene.

The suspect, Siders, was found to be a felon and currently on probation. On 05-23-2017 Siders pled guilty on case number 1616CR0286801 and sentenced SES with 5 years probation.

Detectives believe based on the information obtained during the investigation that the victim's vehicle was targeted believing it was related to the disturbance that occurred at the Shady Lady a minute prior that involved the suspects same vehicle. Based on the evidence it is believed that the victim had no involvement with the incident at the Shady Lady but was targeted merely due to her car's resemblance to the one involved in the earlier incident.

Printed Name Detective Daniel Frazier # 5180 Signature /S/ Detective Daniel Frazier # 5180

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

Judge

Circuit Court of _____ County, State of Missouri.