

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

POLICE NO. :	19-021617
PROSECUTOR NO. :	095451731
OCN:	an019574

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 INGENUE K PERSINGER)
)
 2910 S Forest Ave) CASE NO. 1916-CR
)
 Independence, MO 64052) DIVISION
)
 DOB: 01/17/2001)
)
 Race/Sex: B/F)
)
)
)
 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 March 24, 2019, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Donald L. McIntosh Jr. caused the death of Donald L. McIntosh Jr. by shooting him.

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 (571.015-001Y19755213.0)

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 March 24, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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.

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.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
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Independence, MO 64050
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PROBABLE CAUSE STATEMENT

Date: 3/26/2019

Report #: 2019-21617

I, Robert Brady, 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 3/24/2019, at 0017, Ingenue K.D. Persinger, (Race- Black, Sex- Female, DOB- 01/17/2001, Address-2910 S. Forrest Ave Independence Missouri 64050, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 3/24/2019 at approximately 0017 hours, Officers of the Independence Police Department were dispatched to 2910 S. Forrest Ave, Independence, Jackson County Missouri 64052 in reference to a reported shooting. Dispatch reported they received a 911 emergency call from Ms. Penny Wren who stated a male subject had been shot in her house. During the 911 call, Ms. Wren advised dispatch that Mr. David Sutton had shot the victim.

Upon arrival of Officers, they entered the above residence and observed a male subject identified as Donald Macintosh Jr (Herein referred to as DJ) lying on the floor of the master bedroom located on the ground floor of the residence. DJ had obvious gunshot wounds to his body and required immediate medical attention. He was transported from the scene by AMR to Centerpoint Hospital and later died from his injuries.

Throughout the course of the investigation, several subjects were interviewed with knowledge of the case. Based on statements provided by witnesses, it was determined that Ms. Ingenue Persinger was the subject that shot DJ. On 3/25/19 Ingenue was interviewed by Detectives of the Independence Police Department. During that interview, she provided a confession that she shot DJ multiple times while inside of the house.

Detective Robert Brady

/s/ Robert Brady

Print Name

Signature