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

POLIC	<b>E NO.</b> :	1901203	305	
PROSECUTO	ECUTOR NO.: 09		095451793	
	OCN:	CW0057	709	
STATE OF MISSOURI,	PLAIN	TIFF,	) )	
VS.		`		
MACKENZIE J. HYATT 404 SE Westwind Lees Summit, MO 64063 DOB: 04/28/2001 Race/Sex: W/F			CASE NO. 1916-CR DIVISION	
	DEFENI	DANT.	)	

# **COMPLAINT**

### Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 4, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, knowingly caused the death of Riley McCrackin 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.

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

## State vs. Mackenzie J. Hyatt

Prosecuting Attorney Jackson County, Missouri by,

/s/ Hallie L. Williams
Hallie L. Williams (#66333)
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#### Probable Cause Statement Form

Date: 3/28/2019 Report: 190120305

I, Erica Hopper, 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 3/4/2019, at 10012 ½ E. 63<sup>rd</sup> Street, Raytown, Missouri 64133, Mackenzie Hyatt, a white female born 04/28/2001, committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On March 4, 2019, at approximately 2249 hours, Riley S. McCrackin, date of birth August 31, 1999, was shot to death by two unidentified individuals. The incident occurred in the rear parking lot area of 10012 East 63rd Street, Raytown, Missouri, identified as Raytown Recreation.

Multiple security video recordings of the incident were obtained. The video recordings show McCrackin exit the rear of Raytown Recreation and stand in the parking lot for a moment, as if he were waiting for someone. At one point he appears to look at his phone. Two subjects then emerge from the northeast corner of an adjacent business, 4M Building Solutions, located just north of Raytown Recreation, and approach McCrackin. One subject emerged from behind the building (Shooter #2), while the other subject emerged from behind a trash dumpster (Shooter #1). McCrackin appeared to know the subjects, as he began approaching them and had his hands in his pockets. The subjects initially had their hands in their pockets as they approached. Shooter #1 first brandished a handgun and fired multiple rounds at McCrackin. Shooter #2 also brandished a handgun and fired at McCrackin was mortally wounded. The subjects then fled the scene on foot, running north. During the subsequent investigation, five (5) .45 caliber shell casings were located, and three (3) 9mm shell casing were located.

During subsequent interviews, earlier in the day on March 4, 2019, a witness overheard two conversations between McCrackin and a subject identified as Logan England, date of birth October 1, 1999. The conversations occurred using the Snapchat application. The witness knew the conversations were with England because McCrackin identified England by name during one of the conversations, and the second conversation occurred on speakerphone, where they could hear. The witness had personal knowledge of England and recognized his voice. During the conversations between McCrackin and England, the witness heard them discussing England meeting McCrackin at Raytown Recreation that evening. Once McCrackin and the witness got to Raytown Recreation, England was not there. Immediately prior to the shooting, the witness stated McCrackin told them he was going outside to meet England.

On March 6, 2019, an interview was conducted with witnesses familiar with England. During the interview, they stated England arrived at their residence between 0100 and 0200 hours, on the morning of March 5, 2019. One witness stated they were on the couch in the residence and they heard England in his room, crying. The witness further stated the light in England's room never turned off. One witness stated they knew England for approximately a year and a half. During a subsequent interview on March 8, 2019, one witness observed a video recording of the incident. After watching the recording, they identified Shooter #1 as Logan England. The witness identified him as England based on the shooter's gait, posture, clothing, and the manner in which he wore his clothing. The witness stated they would recognize England if they only saw him from the rear while walking down the street.

On March 11, 2019, at approximately 1655 hours, the witness was interviewed a second time. The witness stated they received a telephone call at approximately 1143 hours, on March 11, 2019. The number the call originated from was identified as belonging to a subject who was identified as England's girlfriend. The witness further stated the individual on the phone identified himself as England. The witness stated England initially spoke to them about getting money to his mother. The witness subsequently told England they knew what was going on and stated, "You shot a man, they called me, I seen the video. I said you shot a man Logan." The witness stated England broke down crying and responded, "I know, I know, I know I did. I'm so mad at myself. I can't believe I did this." The witness further stated they told England to turn himself in. During the interview, the witness stated they had known England for approximately two years, and was around him almost daily.

On March 11, 2019, a witness familiar with England reported he left their residence at approximately 2000 hours, on March 4, 2019, and did not return until March 10, 2019. Upon his return, he cried and stated he was sorry for what he had done. The telephone bearing the number which England used to contact a previously mentioned witness was in this witnesses possession.

On March 11, 2019, without prior contact from law enforcement, England contacted the Raytown Police Department and informed them he would be voluntarily surrendering that afternoon. On March 11, 2019, at approximately 1600 hours, England voluntarily surrendered himself to the Raytown Police Department.

On March 14, 2019, multiple interviews were conducted with three other witnesses. Information was independently obtained and corroborated from each witness that identified Shooter #2 as Tynan Mullen, date of birth September 13, 1999. All three witnesses stated they were told facts about the incident by England.

According to the witness' statements, Mullen, England, one of the aforementioned witnesses, and another witness were together on March 4, 2019, traveling in a white Dodge Dart owned by Mullen. They stated Mullen was driving, and England was in the rear passenger seat. Prior to the shooting, they stated England was already in possession of a firearm, but they went to one of the witnesses residences and obtained a firearm for Mullen. They also went to a gas station in Raytown, identified as a BP gas station, located at 10901 E State Route 350, Raytown, Missouri. After leaving the gas station, they parked on a dead end road west of Raytown Road and north of Raytown Recreation, identified as East 60th Terrace. The witnesses stated Mullen and England were going to meet McCrackin to have a discussion about an issue between them. Once parked, the witnesses stated Mullen and England exited the car and began walking south, toward Raytown Recreation. Several minutes elapsed until Mullen and England returned. After returning to the vehicle, they left the area and took one of the witnesses home. The remaining witness and Mullen then dropped England off at another witnesses residence. After dropping England off, Mullen and the remaining witness picked up another friend and returned to Raytown Recreation, where they met with friends of McCrackin.

On March 15, 2019, surveillance video was obtained from the aforementioned BP gas station. On March 4, 2019, at approximately 2058 hours, Mullen's white Dodge Dart pulled into the parking lot, and Mullen entered the store. Two of the witnesses can be seen in the vehicle, and a fourth person can be seen in the rear passenger seat, however they are unidentifiable in the video. The shoes and pants Mullen is wearing while entering the gas station are consistent with the clothing worn by Shooter #2 in the security video recordings of the incident.

On March 15<sup>th</sup>, 2019, after reviewing surveillance video from the BP gas station, Mullen's white Dodge Dart vehicle bearing Missouri temporary license plate of 041JQF expiring 3/21/2019 was parked in front of his residence in Jackson County Missouri. At approximately 1230 hours, the vehicle left the residence. The vehicle was stopped by a marked Missouri State Highway Patrol unit. The white Dodge Dart was occupied by Mullen

and Kaci Cox, a white female born June 26<sup>th</sup>, 2001. Mullen and Cox were arrested without incident and were transported to the Raytown Police Department.

An interview was conducted with Mackenzie Hyatt on 3/28/2019. Hyatt confirmed she came to the police station at her own free will and read aloud a Miranda Waiver, which she verbally advised she understood. Hyatt advised after England and Mullen returned to the Dodge Dart parked in the residential neighborhood, Mullen yelled at Cox to drive away. Hyatt stated Cox refused to drive because she didn't have a license. At that time, Hyatt stated she got into the driver's seat. She stated Mullen got in the rear passenger seat and as soon as he got into the car, Mullen stated "I just blasted that nigga in the head". Hyatt stated she took a left and another left to leave the area. Hyatt said immediately following the shooting, they drove to Cox's residence. While en route to the Cox residence, Hyatt stated she was yelling at England to figure out if he killed McCrackin and England said "I'm going to jail".

While at the Cox residence, Cox went inside. A few minutes later, Cox returned to the vehicle with a sweatshirt for Mullen. While Cox was inside the residence, Hyatt stated she climbed from the driver's seat into the back seat between the front seat over the center console. Once Cox returned to the vehicle, England told Mullen to take him home. Mullen drove the vehicle to a residence north of Kansas City to drop England off. Upon arrival at that residence, Hyatt stated Cox asked Hyatt to get out of the vehicle so she could talk with Mullen. Hyatt stated she stepped out of the vehicle for approximately 5-10 minutes and eventually Cox told Hyatt she could get back in the car. While outside the vehicle, Hyatt stated England told her he was sorry and that he was going to jail. Hyatt stated she got back in the Dodge Dart and they drove her back to a residence in Lees Summit, Missouri. While en route to Lees Summit, Hyatt stated Mullen received a phone call from a witness stating McCrackin had been shot. Hyatt said Mullen acted as though he didn't care and started to "fake cry". The witness then requested they (Cox and Mullen) go to the scene. Immediatley following the conversation with the witness, another witness 'Facetimed' Mullen and told him McCrackin had been shot. Hyatt stated after being dropped off, Mullen and Cox went to a differnet residence north of the city and picked up the witness. Cox, Mullen and the witness then returned to the scene at Raytown Recreation.

Hyatt relayed again that the Dodge Dart was parked in a residential neighborhood down the street from Raytown Recreation. Hyatt stated the plan was for England and Mullen to meet with McCrackin to "squash the beef". Hyatt stated they parked so far away because England told her prior to arriving that they might fight McCrackin and he didn't want Hyatt to see that.

Name: Det. E. Hopper #1680 Signature: /s/ Det. E. Hopper #1680