

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

POLICE NO. :	19-018982
PROSECUTOR NO. :	095452087
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
KEYON D. PATTERSON)	
5258 Swope Parkway)	CASE NO. 1916-CR
Kansas City, MO 64130)	DIVISION
DOB: 12/25/1991)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT

Count I. 565.020 - 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 between March 13, 2019, and March 14, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to L.O. caused the death of L.O. by stabbing her.

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 (571.015-001Y19755299.0)

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 between March 13, 2019, and March 14, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second

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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 dangerous instrument.

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/ Nichole Erickson
Nichole Erickson (#52086)
Assistant Prosecuting Attorney
415 E. 12th Street, 11th Fl
Kansas City, MO 64106
(816) 881-3345
NErickson@jacksongov.org

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. L.O, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

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5. PO Dylan Pifer, 1125 Locust, Kansas City, MO
6. PO Eric D. Stubbs, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/10/2019

CRN: 19-18982

I, Detective Chason Crowell #5228
(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 03/13/2019, at 6433 Manchester Apt#7 in
(Date) (Address)

Kansas City, Jackson Missouri Keyon D Patterson
(County) (Name of Offender(s))

BM,12/25/1991 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 03-15-2019 at 1330 hours Officers of the Kansas City Missouri Police Department were dispatched to 6433 Manchester Avenue # 7, Kansas City, Jackson County, Missouri on a reported dead body. Upon arrival, they located a black female face down on the floor inside the apartment deceased. On 3-16-2019 Jackson County Medical Examiner ruled the victim’s death a Murder and indicated the case was from multiple stab wounds.

The reporting party stated the last time she saw or spoke to the victim was in the evening of 03-13-2019 when the victim came and showed her a vehicle which she had just purchased, a blue 2008 Honda SUV. In the afternoon of 03-15-2019, when she had not heard from the victim, she and her other sister went to the victim’s apartment and found her deceased. She further advised that the victim’s vehicle was missing.

Crime Scene investigation indicated a struggle had taken place and there was a large amount of blood at the scene. Of note was a hand impression in blood found on a chair cushion cover inside the apartment. The victim’s cell phone was also found to be missing. Review of the video surveillance at the victim’s apartment complex show the victim arriving at the complex at 11:16 PM on 03/13/19. She exits the driver side of her car and a second person is seen exiting the passenger side and they both walk toward the victim’s apartmet. The victim is seen to be wearing white and the passenger is wearing dark colors. At approximately 1:13 AM on 03/14/19 the subject in dark clothing enters the driver seat of the victim’s vehicle and drives away.

Family members and friends of the victim stated the victim was involved in a romantic relationship with “Keyon” for the last month. Family advised the victim and "Keyon" had met on Facebook. They also provided the Facebook account for “Keyon” as “Salam Peace”. Investigation found this person to be Keyon D. Patterson B/M 12-25-1991.

On 03/15/2019 the victim’s vehicle was recovered at an apartment complex located near the intersection of 51 St. and Swope Parkway. The vehicle was abandoned and a large amount of apparent blood was found inside the vehicle.

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On 03/19/2019 Keyon Patterson was interviewed. At that time detectives noted him to have a healing injury to his hand between the thumb and forefinger. Patterson admitted he knew the victim, they had met on Facebook, and had been hanging out for about a month. He stated he had last been to her apartment in February. Patterson denied having ever been inside her new vehicle, but he had seen a picture of it on Facebook. Patterson provided his address as 5258 Swope Parkway. It should be noted this is approximately one block from where the victim's car was recovered.

A court order for the victim's cell phone records was obtained and reviewed showed that the last 4 calls on her phone were to the number 913-706-3748. A court order was obtained for this number and it was found to belong to Keyon Patterson. Cell tower mapping on Patterson's cell phone shows it to be hitting off the towers near the victim's apartment on the evening and early morning hours of 03/13/19 and 03/14/19.

On 04/01/2019 family of the victim contacted the detectives and advised they had found the victims Apple watch inside her apartment. Detectives reviewed the data on the Apple watch and observed text conversation between the victim and Patterson. The text conversation on 3-13-2019 at approximately 9:45 PM indicated that the victim was picking Patterson up and that he was planning on spending the night at her apartment.. According to the text conversion the victim picked Keyon up from 5258 Swope Pk.

The Regional Crime Lab tested swabs of blood taken of the bloody hand impression on a chair cushion cover inside the apartment. On 04/09/2019 detectives received information from the Regional Crime Lab that the lab results from the bloody handprint indicated there to be DNA from the victim as well as DNA in the area between the thumb and forefinger that matched Patterson.

On 04/11/2019 at 11:15 hours Patterson was taken into custody and transported to 1125 Locust. Patterson was read his Miranda Warning and advised he understood his rights and wished to talk to detectives. Patterson denied being at the victim's apartment the night of the homicide and requested an attorney. The interview was terminated and Patterson was transported to East patrol for booking.

Printed Name Det. Chason Crowell #5228 Signature /s/ Det. Chason Crowell 5228

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

Judge

Circuit Court of _____ County, State of Missouri.