

PROBABLE CAUSE STATEMENT FORM

Date: 07-16-2019

CRN: 19-047234

I, Det. Ryan Taylor, #5585 KCPD Homicide Unit
(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 06-25-2019, at 612 Spruce Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Marcus S. Lewis
(County) (Name of Offender(s))

B/M 09-13-1977, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

- Murder
- Armed Criminal Action
- Felon in Possession of a Firearm

The facts supporting this belief are as follows:

On 06-25-2019 at 06:34 hours, officers were dispatched to 612 Spruce on a reported dead body. Upon arrival officers observed the victim lying on her back on the north side of 612 Spruce. The victim was lying on her back. The victim was partially nude. The victim appeared to have a multiple defects on her body consistent with gunshot wounds. Five 9 mm shell casings were collected from around the victim's body. The Jackson County Medical Examiner ruled the cause of death as Homicide.

It should be noted that KCPD officers put out a sound of shots call in what they believed was the area of Independence Avenue and Myrtle Avenue at 02:08 hours, just four blocks west from Spruce.

The KCMO PD Crime Lab tested the shell casings for DNA and entered into CODIS. A DNA match in CODIS revealed an investigative lead to Marcus Lewis [REDACTED]

Detectives checked Marcus Lewis through databases. In one of the reports Lewis and the registered owner of a vehicle with a Missouri license plate of CR1-N1Y were listed as being in a relationship. It was determined that the license plate CR1-N1Y responded through a License Plate Reader database on a black Chevy Impala. The Chevy Impala was on the LPR on the night of the homicide driving eastbound on Independence Avenue and Prospect on 06-25-2019 at 01:07 hours and then southbound on Independence Avenue and Hardesty on 06-25-2019 at 02:33 hours.

On 07-16-2019, Marcus Lewis was arrested on a stop order for Aggravated Domestic Violence Assault, and Armed Business Robbery. Lewis was advised of his Miranda Rights at 1420 hours and he agreed to speak with detectives. When confronted with the DNA evidence from the shell casing, Lewis stated that he committed the homicide by shooting the victim. Lewis stated on the night of the homicide he was sitting inside of his Chevy Impala at O'Reilly Auto Parts on Independence Avenue by Baccala Strip Club. Lewis said he observed the

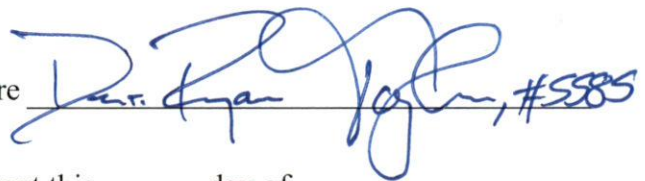
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victim walking on Independence Avenue, who appeared to be highly intoxicated, and exposing herself. The victim approached Lewis who was in his car, attempting to solicit a date. Lewis stated he wasn't interested but got out of his car and attempted to walk away. Lewis got to the area of Independence Avenue and Spruce when the victim began to solicit him again and stated "you're going to be my daddy" and "I'm going to get that dick." Lewis stated the victim grabbed him by the side, grabbing his shirt and pulled him towards an abandoned house on Spruce Ave. As they were walking, he stated he was trying to tell the victim that he was not interested. A physical altercation ensued and victim and Lewis fell to the ground fighting. Lewis stated that as he was escaping the victim's grasp he pulled out his gun and shot the victim. Lewis stated that he then ran away from the scene, got into his vehicle and then went home. Lewis stated that he purchased his firearm earlier in the day of the homicide and then after the homicide sold the firearm to an unknown individual. Lewis described the firearm as a 9mm handgun with a black grip and a silver slide. Lewis acknowledged that he was a felon and was not supposed to possess a firearm.

I believe that Marcus Lewis poses a danger to the community or to any other persons because he is a habitual unregistered sex offender. He is under investigation for aggravated domestic violence involving a firearm and an armed business robbery involving a firearm.

Printed Name Det. Ryan Taylor, #5585

Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.

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

POLICE NO. :	KC19-047324
PROSECUTOR NO. :	095453785
OCN:	HS011326

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MARCUS S. LEWIS)	
5105 Winner Rd., Apt. #5)	CASE NO. 1916-CR
Kansas City, MO 64127)	DIVISION
████████████████████)	
████████████████████)	
████████████████████)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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 June 25, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Christopher Lindsey, caused the death of Christopher Lindsey by shooting him.

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.

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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 June 25, 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.

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.

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 June 25, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a firearm, to wit a handgun capable of shooting a 9mm round of ammunition, and on April 23, 1998, the defendant was convicted of the felony of Statutory Rape in the First Degree in the Circuit Court of Jackson County, Missouri, in case number 16CR96071141-01.

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.

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.

State vs. Marcus S. Lewis

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/ Sarah A. Castle
Sarah A. Castle (#64770)
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WITNESSES:

1. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
2. DET Timothy R. Taylor, 1125 Locust, Kansas City, MO 64106