

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

POLICE NO. :	KC19065091
PROSECUTOR NO. :	095454725
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
TAYLOR D MACKEY	)	
3333 Indiana Ave.	)	CASE NO. 1916-CR
Kansas City, MO 64130	)	DIVISION
DOB: 05/14/2001	)	
Race/Sex: B/M	)	
	)	
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 August 27, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with others, with the purpose of causing serious physical injury to Isaac L. Brown caused the death of Isaac L. Brown by shooting him.

Defendant is further given notice that should the State submit murder in the second degree - felony under Section 565.021.1(2), RSMo, it will be based on the death of Isaac L. Brown as a result of the perpetration of the class B felony of Unlawful Use of a Weapon under Section 571.030, RSMo, committed by the defendant, either acting alone or purposefully in concert with others.

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 August 27, 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. 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 Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20145299.0)

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 B Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about August 27, 2019, at 2649 Lockridge Avenue, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a person, Isaac L. Brown.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person

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shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

Count IV. 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 about August 27, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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. 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.

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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/ Katherine Baker Nelson

Katherine Baker Nelson (#62733)
Assistant Prosecuting Attorney
415 E. 12th Street, 11th Floor
Kansas City, MO 64106
(816) 881-3560
kj baker@jacksongov.org

WITNESSES:

1. PO Kenneth W. Allen, 1125 Locust, Kansas City, MO 64106
2. [REDACTED] MO
64106
3. Isaac L. Brown, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO
64106
4. PO James Brownsberger, 1125 Locust, Kansas City, MO 64106
5. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
6. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
7. [REDACTED]
64106
8. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO
64106
9. DET Holly J. Zornes, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09-05-2019

CRN: KC19065091

I, Det. Chason Crowell #5228 Kansas City Missouri Police Department, 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 08-27-2019, at 2649 Lockridge Avenue in
(Date) (Address)
Kansas City, Jackson Missouri Mackey,Taylor
(County) (Name of Offender(s))
B/M, 05-14-2001 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08-27-2019 at approximately 1750 hours, officers of the Kansas City Missouri Police Department were dispatched to the area of 2649 Lockridge Avenue, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, officers located a black male victim suffering from apparent gunshot wounds. The victim was transported to an area hospital, where he died as a result of the injuries. The victim was transported to the Jackson County Medical Examiner's Office, where his death was ruled a homicide.

An investigation of the crime scene revealed two spent shell casings, caliber: .380 Auto, and various items of clothing: two shirts that responding Officers stated had been cut off of the victim in order to render first aid, as well as a gray shirt found in the street near where the victim had been prior to transport by EMS.

Witnesses were contacted and stated they had heard the shots and then observed the victim lying in the street. Two black males with their hair pulled up in pony tails were seen leaning over the victim and then they observed these males to run from the scene. A second witness was contacted and stated that she had been outside minutes before the sound of shots and she had observed two black males with a "fountain" style hairdo walking with a third male down the street.

Detectives located surveillance footage from Morning Star retirement home which is near the intersection of Lockridge Av and Prospect Av. In the footage the victim is seen meeting up with two slim black males. One male is wearing a red and black shirt and khaki shorts the other is shirtless and wearing greyish sweat pants that are pulled up to his knees. Both of these black males have what appears as "Fountain" style hair pulled up on the top of their head.

An officer who works as School Resource Officer (SRO) at Central Academy of Excellence, 3221 Indiana Avenue, was asked to view the footage from Morning Star to see if the subjects in the video were familiar, given information that two subjects of interest were likely of school age and the proximity of the school to this scene. The SRO believed the two subjects to be "the Mackey brothers," who she knew to live in the area of the school. The SRO advised that "the Mackey brothers" frequented the area around the BP gas station, 3319 Linwood Blvd, especially around the time that school lets out, 1420 hours.

Detectives reviewed footage from the BP gas station, 3319 Linwood Blvd, and observed two subjects, consistent in appearance with those observed in the Morning Star surveillance footage. Still shot images of the two subjects

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were released via the KCPD Media Unit and several anonymous tips began to be received by the KCPD identifying the two subjects as **Taylor Mackey** and his juvenile brother [REDACTED] **06-22-2004**.

On 09-04-2019, both suspects were brought to police headquarters by a parent. Taylor Mackey was advised of his rights and agreed to speak to detectives. Mackey confessed that he and his brother [REDACTED] saw the victim at Prospect Av and E. 28th St. They walked along with the victim and turned east bound on Lockridge Av. Mackey advised that he believed the victim was responsible for a prior shooting in which his brother [REDACTED] was shot and he wanted the victim to feel the same pain his brother felt. He stated he was thinking this was his time to "Get him." He advised that he and his brother [REDACTED] approached the victim and began talking to him they then both pulled out guns and shot the victim one time each.

Detectives located CRN KC19031778 in which [REDACTED] is the victim of an Aggravated Assault Shooting.

[REDACTED] was advised of his rights by Deputy Juvenile Officer Grimes. His father was present at the time of his questioning. [REDACTED] initially denied being in the area of the offense. After being told of the video surveillance putting him at the scene, he admitted that he was on the block, but he was at a residence to visit a friend. He stated that while in the residence he heard the shots. He stated he was wearing a red and black shirt and his brother Taylor Mackey was shirtless. Shortly thereafter, [REDACTED] father requested a lawyer on his behalf.

I believe that the defendant poses a danger to the community or to any other person due to violent nature of the above offense which was unprovoked by the victim.

Printed Name Det. Chason Crowell #5228 Signature _____

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

Judge

Circuit Court of _____ County, State of Missouri.