

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

POLICE NO. :	KC20015120
PROSECUTOR NO. :	095457975
OCN:	

STATE OF MISSOURI,
PLAINTIFF,
vs.
DESHONIA S DIAMOND
1320 E 89th St., Apt. 1W
Kansas City, MO 64131
DOB: 09/05/1992
Race/Sex: B/F
[REDACTED]
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 February 28, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Devon Nolan caused the death of Devon Nolan by shooting him and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Devon Nolan as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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.

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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 February 28, 2020, in the County of Jackson, State of Missouri, the defendant is guilty of 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, Resulting In Death Or Injury (571.030-015Y20145213.0)

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 A Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about February 28, 2020, at 1200 E Linwood Blvd., Kansas City, in the County of Jackson, State of Missouri, the defendant knowingly shot a firearm from a gold Chevrolet Impala, a motor vehicle, and as a result of the above-described conduct, Devon Nolan suffered injury or death.

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.

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Count IV. 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 February 28, 2020, in the County of Jackson, State of Missouri, the defendant is guilty of 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.

Count V. Failure To Report A Shooting - 1st Offense (577.068-002Y20174812.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.068, RSMo, committed the **class A misdemeanor of failure to report a shooting**, punishable upon conviction under Sections 577.068, 558.002 and 558.011, RSMo, in that on or about February 28, 2020, in the County of Jackson, State of Missouri, the defendant, while in possession of a firearm, discharged such firearm causing injury to Devon Nolan, and knowing that the defendant had caused such injury, failed to report such shooting to the nearest law enforcement agency.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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

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more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ *Jamie K. Hunt*

Jamie K. Hunt (#50401)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, MO 64106
jhunt@jacksongov.org

WITNESSES:

1. [REDACTED]
[REDACTED] City, MO
64106
 3. SGT Stephanie L Chandler, 1125 Locust, Kansas City, MO 64106
 4. PO Audrey Crosby,
 5. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
 6. D. D., Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
 7. PO Timothy Falk, 1125 Locust, Kansas City, MO 64106
 8. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
 9. PO Dane Jensen, 1125 Locust, Kansas City, MO 64106
 10. [REDACTED]
[REDACTED]
- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Nathan C. Kinate, 1125 Locust, Kansas City, MO 64106
16. PO Kevin Koppe, 1125 Locust, Kansas City, MO 64106
 17. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

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18. PO Christopher Martin, 1125 Locust, Kansas City, MO 64106
19. PO Jayden McMahon, 1125 Locust, Kansas City, MO 64106
20. D. N., Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
21. D. N., Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
22. [REDACTED]
23. Devon C. Nolan, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
24. PO Drunell Phillips, 1125 Locust, Kansas City, MO 64106
25. PO Xavier Ramos-Dixon, 2640 Prospect Ave., Kansas City, MO 64127
26. PO Venasa L. Ray, 1125 Locust, Kansas City, MO 64106
27. SGT Larry B. Schoen, 1125 Locust, Kansas City, MO 64106
28. PO Abygail Shockley, 1125 Locust, Kansas City, MO 64106
29. PO Rares S. Toma, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02-28-2020

CRN: KC20015120

I, Detective Chason Crowell #5228 of the Kansas City Missouri Police Department
(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 02-28-2020, at 1200 E. Linwood Blvd. in
(Date) (Address)

Kansas City, Jackson Missouri Deshonia S. Diamond
(County) (Name of Offender(s))

R/S: B/F DOB: 09-05-1992 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 02-28-2019 at 1559 hours Officers of the Kansas City Missouri Police Department were dispatched to 1207 E. Linwood Blvd. Jackson County, Missouri, on a reported Shot Spotter, sound of shots. Upon arrival officers located the victim, a black male, suffering from apparent gunshot wounds. The victim stated to the officers that "Deshonia Diamond" shot him with a pink gun and she was driving a gold colored vehicle. The victim was transported to Truman Medical Center for medical treatment where he died as a result of his injuries.

Officers viewed the video surveillance footage from a business across the street from the dispatched address and observed the suspect vehicle to be gold Chevrolet four door sedan with black front bumper and black wheels. The suspect vehicle information was then broadcasted to other officers and an officer observed a vehicle matching that description at 62 St. and Paseo. A car check on that vehicle was conducted and the driver was identified as Shelly Jones B/F, 06-25-91, Ms. Jones advised she is a friend of the suspect and had just dropped her off at her (Ms. Jones') apartment at 6001 Blue Hills Rd. #5.

Officers responded to 6001 Blue Hills Rd. # 5. Officers gave verbal commands to the suspect to exit the apartment and the suspect, Deshonia Diamond B/F, 09-05-1992 exited the apartment and was taken into custody. Based on the knowledge that children were inside the apartment unattended, officers asked Ms. Diamond if there were any firearms inside the apartment. At that time, Diamond stated there was a firearm on the couch. The officers entered the apartment and removed the children for their safety.

Detectives obtained a search warrant for the apartment through the Jackson County Courts. Upon execution of the search warrant Detectives located a pink and black 9mm SCCY firearm tucked into the cushions of the couch in the living room of the residence.

The witness, Ms. Jones responded to Police Headquarters to provide a formal statement, she advised that she is a friend of Ms. Diamond and that she allowed Ms. Diamond to drive her gold Chevy Impala to the KCPD

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Central Patrol Division Station where Diamond planned to exchange her children with the victim. Ms. Jones stated she sat in the front passenger seat and her mother was seated in the back seat with her niece, her child, and Diamond's three children. Ms. Jones advised the exchange was completed and she could tell Ms. Diamond and the victim were exchanging heated words but she was unable to hear what was said. Ms. Diamond got back into the driver seat of the gold Chevy Impala and drove the vehicle to the exit of the parking lot driveway where it met Linwood Av.

As they were waiting for traffic to clear, the suspect pulled his white SUV alongside the driver's side of Ms. Jones' vehicle. The victim exited his vehicle, came around the front of his vehicle and was walking toward the driver door of the gold Chevy Impala. Ms. Jones advised the victim was hollering at Ms. Diamond and "talking with his hands." She stated at no time did she ever see the victim with any weapons in his hands. She observed Ms. Diamond to have her left arm out of the gold Chevy Impala, down along the side of the vehicle. She stated the victim was approximately ten feet away from the vehicle. She then heard one gun shot. She advised that she told Ms. Diamond, "You didn't have to shoot him, you could have just backed up." Ms. Jones stated she never observed the firearm in Ms. Diamond's possession but knew her to own a pink handgun.

Ms. Diamond drove away from the scene and ultimately responded to Ms. Jones residence located at 6001 Blue Hills Rd. # 5, where she was taken into custody.

A second witness, Ms. M. Jones, mother of witness Ms. Jones, responded to Police Headquarters to provide a formal statement and advised that she was in the vehicle with Diamond, Ms. Jones, and several children. Ms. M. Jones stated that Diamond drove to the Central Patrol Division and entered the parking lot, where the victim was already waiting. Diamond took two of her children and put them in the victim's vehicle and also moved their bags over from the trunk of Ms. Jones' car to the victim's vehicle. Ms. M. Jones stated that the conversation between Diamond and the victim became heated when Diamond referenced that the victim must have gotten his vehicle windows repaired that she had previously shot out. Diamond then got back in the driver's seat of the car and drove to the exit lane at Linwood. The victim then pulled his vehicle up alongside the car and the victim got out of his vehicle, walked around the front of his vehicle and toward the car. The victim had his hands in his pockets, said something that Ms. M. Jones could not make out, removed his hands from his pockets, and Diamond leaned to the side in the driver's seat and fired a shot, striking the victim. Ms. M. Jones stated that she had no idea that Diamond had a firearm. Ms. M. Jones stated that the victim was not assaulting Diamond and had just removed his hands from his pockets when Diamond shot. Ms. M. Jones did say she thought the victim was going to hit the suspect but did not think the suspect should have shot the victim. Ms. M. Jones stated Diamond apologized to her as they drove away from the scene.

Ms. Diamond was transported to Police Headquarters, advised of her Miranda rights and agreed to speak with Detectives. She stated that the victim had been abusive to her in the past and on today's date, she had arranged to exchange her children with the victim at the KCPD Central Patrol Division. She advised she was carrying a pink and black .9mm SCCY handgun in the front pouch of her jacket. She stated she had the firearm because she was extremely afraid of the victim. She admitted that while she was outside of the vehicle she made the statement, "I see you got your windows fixed from when I shot them out last time." She advised she was referring to an incident that happened a couple years ago when she used a crow bar to bust a window out of the victim's vehicle. She stated she attempted to exit the parking lot of KCPD Central Patrol Division when the

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vehicle she was driving was blocked by the victim's white Suburban. She advised she could not see around his vehicle and could have only turned right or backed up; however traffic, was coming which kept her from turning out of the parking lot on to Linwood Blvd.

The victim exited the driver's seat of his vehicle and walked around the front of his vehicle while he had his right hand in his jacket pocket. The victim was making the statements, "I'm gonna spit on you and beat your ass." As the victim exited his vehicle Ms. Diamond advised she took her handgun out of her front pouch and held it against the outside of her driver door. She asked the victim not to come any closer to which he stated he would take the gun and shoot her with it as he continued to approach her. Ms. Diamond stated she fired one shot. The victim grabbed his body and stated, "Bitch you just shot me." Ms. Diamond stated she drove away from the scene, to the residence of Ms. Jones where she was apprehended by the Police.

Detectives reviewed the victim's cell phone data and observed text messages where the suspect was threatening to kill the victim. There was a recorded phone call on the victim's phone that captures the suspect threatening to shoot the victim and telling the victim his mother is going to have to bury him.

Based upon the defendant's conduct in this incident, and her prior history of threats, I am requesting a warrant be issued for the defendant's arrest as she constitutes a danger to the community. Additionally, the defendant's last known address is in the State of Iowa.

Printed Name Detective Chason Crowell 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.