

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

POLICE NO. :	KC19070669
PROSECUTOR NO. :	095458846
OCN:	HR009603

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DAVID Z. HAYNIE)	
31609 E. Harris Potts Rd.)	CASE NO. 2016-CR
Oak Grove, MO 64075)	DIVISION
DOB: 01/22/1992)	
Race/Sex: W/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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 September 16, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Darryle J Humbird caused the death of Darryle J Humbird by striking him with a rock.

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

State vs. David Z. Haynie

571.015.1, RSMo, in that on or about September 16, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of murder second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder 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 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/ Daniel Portnoy

Daniel Portnoy (#62186)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Floor
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WITNESSES:

1. Sean Braden, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

State vs. David Z. Haynie

2. [REDACTED]
[REDACTED]
[REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
5. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
6. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. Darryle J Humbird, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
8. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
9. David K Lund, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
10. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
11. DET Jacquelyn R. Mutschler, 1125 Locust, Kansas City, MO 64106
12. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
13. Stephanie R Rifenburg, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
14. DET Bradley N Thomas, 1125 Locust, Kansas City, MO 64106
15. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04-20-2020

CRN: 19-070669

I, Det. Scott Mullen #5431
(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 09-16-2019, at 9132 E. 43rd Terrace in
(Date) (Address)

Kansas City, Jackson Missouri David Z. Haynie
(County) (Name of Offender(s))

W/M 01-22-1992, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 09-16-2019 at approximately 1042 hours, Officers from the Kansas City Missouri Police Department were dispatched to 9132 E. 43rd Terrace in regard to an EMS call. Upon arrival officers contacted the reporting party who is the victim's girlfriend. Officers also contacted the victim's neighbor. Both the victim's girlfriend and neighbor responded to Police Headquarters to provide formal statements.

The victim appeared to have been beaten to death and multiple items of evidentiary value were recovered from the crime scene to include a large rock with apparent blood on it which was near the victim.

The Jackson County Medical Examiner's Office later ruled the victim's death a homicide from blunt force trauma to the head.

After the victim's homicide, the victim's daughter contacted the reporting detective to report the victim's credit card had been used after his death. The victim's daughter forwarded the reporting detective a Credit One Bank statement for the dates 09-10-2019 through 10-09-2019. The victim was found deceased on 09-16-2019 and the statement listed 1 charge on 09-23-2019 and 8 charges on 09-30-2019.

The charge on 09-23-2019 was for \$66.88 from HTS Kansas City - Independence MO. One of the charges on 09-30-2019 was for \$72.04 from Hotels.com. Another charge on 09-30-2019 was for \$8.07 from KCM Taxi K0125 Kansas City, MO.

KCM Taxi was tracked to 1512 Marsh Ave, Kansas City, MO. The manager stated he was able to locate the transaction from the victim's credit card and stated the driver who made the run and subsequent charge was Marlei Lee. The reporting detective responded to KCM Taxi and was provided a receipt from the transaction in question. Lee was contacted who stated she remembered the fair and transaction. Lee stated she picked up a female who she described as a mother who was with another younger female the younger female's boyfriend. Lee stated the trip was less than 5 minutes and she drove them to the Home Towne Studio & Suites on 42nd St.

The reporting detective responded to the Home Towne Studios and met with the Manager who located the transactions on the victim's card from 09-23-2019 for \$66.88 and the charge for \$72.04 on 09-30-2019. In regard to the 09-23-2019 transaction, the record showed the reservation was made by Samantha Haynie for a 09-22-2019 check-in and departure of 09-24-2019. The manager stated the reservation ended up as a no-show and the card was still charged for one night

PROBABLE CAUSE STATEMENT FORM

CRN 19-070669

due to the no-show. In regard to the 09-30-2019 transaction, the record showed the reservation to Kimberly Haynie with a check-in of 09-30-2019 and departure of 10-01-2019. The manager stated Kimberly Haynie is the one who completed the check-in, completed the rental agreement, and provided her identification. The reporting detective obtained copies of all the transaction paperwork from Dooley to include a copy of Kimberly Haynie's ID.

On 01-13-2020 the reporting detective was forwarded an email with information received by Det. Dolato in regard to the listed murder investigation. The email from Det. Dolato stated he was contacted by a Jackson County Dispatcher who stated he received a call from a witness who told the Jackson County Dispatcher she talked with a Samantha Haynie DOB 04-25-1994 and Samantha told her the suspects listed in the email killed the victim with a rock during a robbery attempt. The witness named as a suspect to the dispatcher **David Haynie DOB 01-22-1992**.

The witness was later contacted who stated Samantha Haynie used to babysit for her and stay with her. The witness stated Samantha progressively got worse and worse with drinking when she was supposed to be watching her son. The witness stated the night before she was going to tell Samantha she had to go and she was not going to watch her son anymore, Samantha was intoxicated inside her living room and confessed to being involved in the homicide in front of her and her mother.

The witness stated Samantha told her she and **David Haynie** were involved in a robbery of their drug dealer and it went bad and then **David Haynie** beat the victim's head with a rock and killed him. Samantha stated they took 41 grams of drugs, the money in the victim's pockets, and a bottle of Giorgio Armani cologne from the victim after he was killed. Samantha told the witness they called a friend to pick them up and he was the getaway driver. The witness stated after the homicide, Samantha and **David Haynie** had a falling out and she took the cologne from **David Haynie** and gave it to a friend. The witness was shown single photos of Samantha G. Haynie W/F 04-25-1994, **David Z. Haynie W/M 01-22-1992**, and the friend who received the cologne. Upon viewing each photo the witness stated each was the person she had previously mentioned during her statement.

The witness' mother was also contacted who stated she was present when Samantha Haynie confessed about her and **David Haynie's** involvement with the victim' murder. The witness' mother stated Samantha stated she and **David Haynie** planned to rob the victim and then it turned into **David Haynie** beating the victim to death with a rock.

On 02-03-2020 the reporting detective received a TIP from the TIPS Hotline which stated a male named **David Haynie** killed the victim and his then wife Samantha Parker (Haynie) was involved. The TIP also stated Samantha later gave another man a bottle of cologne they took from the victim after he was dead and Samantha and **David Haynie** kept the rest of the items.

On 03-13-2020 the reporting detective received a report from the KCPD Crime Lab in regard to the testing of the rock used in the homicide. DNA swabs were taken from the rock avoiding large apparent blood stains. One of the swabs responded back with the victim's DNA on it and an unknown male contributor. The unknown male contributor's profile was entered into CODIS.

On 03-16-2020 the reporting detective received a CODIS Hit report from the Missouri Highway Patrol Crime Lab which stated the unknown male contributor previously mentioned responded back to **David Z. Haynie W/M 01-22-1992**.

Based off the statement obtained from the witness, the TIPS Hotline report, and the reports from both the KCPD and Missouri State Highway Patrol Crime Labs, pick-ups were issued for Samantha Haynie and **David Haynie**.

On 04-20-2020 at 1400 hours, Samantha Haynie was arrested and transported to Police Headquarters. After being read her Miranda Rights. Samantha stated she was not present for the homicide and she was at or near the Wal Mart off 40 Hwy. Samantha stated she observed David Haynie had \$3,000-\$6,000 in cash and drugs he previously didn't have when he returned. Samantha admitted to taking the taxi cab ride and staying in the hotel which were paid for with the victim's credit card, but stated she was unaware how those items were paid for and claimed no knowledge of the stolen credit

PROBABLE CAUSE STATEMENT FORM

CRN 19-070669

card. Samantha stated the person who gave them a ride was not the "getaway driver" but was called several hours after the fact and he did not have anything to do with the homicide.

On 04-20-2020 at 1000 hours, **David Haynie** was arrested and transported to Police Headquarters. After being read his Miranda Rights, **David Haynie** admitted to knowing the victim and being at his house on the day of the homicide to buy drugs between 0600-0645 hours in the morning. **David Haynie** stated he was alone when he went to the victim's house and he never went inside the victim's residence on the day of the homicide. **David Haynie** admitted to taking the taxi ride and staying in the hotel room paid for by the victim's credit card after the homicide but stated he had no knowledge of the victim's credit card being used. **David Haynie** could not explain how the victim's credit card would have been used or in the possession of those who used it. **David Haynie** denied killing the victim and stated he never handled the rock used to kill the victim and had no explanation as to how his DNA was on the rock.

Printed Name Det. Scott Mullen Signature /s/Det. Scott Mullen #5431

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

Judge

Circuit Court of _____ County, State of Missouri.