

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	2020-32862
PROSECUTOR NO. :	095459301
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
DA'QON J SIPPLE	)	
1713 N High St	)	CASE NO. 2016-CR
Independence, MO 64050	)	DIVISION
DOB: 05/13/1998	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

**COMPLAINT
WARRANT REQUESTED**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

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 May 27, 2020, in the County of Jackson, State of Missouri, Mari Mcelyea was killed by being struck by the vehicle the Defendant was operating as a result of the immediate flight from the perpetration of the class B felony of unlawful use of a weapon under Section 571.030(9), RSMo committed by the defendant on or about May 27, 2020, in the County of Jackson, State of Missouri.

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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At
Person, Motor Vehicle Or Building (571.030-020Y20145213.0)**

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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 May 27, 2020, at 808 N Emery, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, 2011 Chevy Cruze.

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 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 III. 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 May 27, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count Two, 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

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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/ Jeremy J. Baldwin

Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
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WITNESSES:

1. DET Eric Burchfield, 1100 SW Smith, Blue Springs, MO 64015
2. Mari Mcelyea, 11101 E Bannister, Kansas City, MO 64123
3. [REDACTED]

PROBABLE CAUSE STATEMENT

Date: 5/28/2020

Report #: 2020-32862

I, Thomas Burchfield, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 5/27/2020, at 1430 hours, Daquon J Sipple, (Race- Black, Sex- Male, DOB- 05/13/1998, Address-1713 N High ST., Independence, MO , [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 5/27/2020 at approximately 1430 hours at 808 N Emery, Independence, Jackson County, Missouri, the defendant did shoot into a vehicle occupied by his ex-girlfriend, the victim, Tiyona Reese. The defendant then fled the scene traveling at a high rate of speed west bound on 24 Hwy. At 24 Hwy and Sterling the defendant struck a southbound vehicle which killed the driver, the only occupant, Mari McElyea.

On 5/27/2020 at approximately 1432 hours officers were dispatched to 808 N Emery regarding an aggravated assault with shots fired. Once on scene officers located a spent shell casing and glass in the roadway. During this time a female, later identified as [REDACTED], called 911 stating her ex-boyfriend, later identified as the defendant, shot at her while she was in her vehicle. She advised dispatch she was chasing the defendant west on 24 Hwy.

[REDACTED] was later brought to police headquarters and interviewed by Det. Cox where she provided the following statement: She came home from work at approximately 1100 hours. The defendant was standing on the front porch talking to his other ex-girlfriend. She advised she walked past them and into the residence at 808 N Emery where she still lives with the defendant. She advised that the other girl left, and the defendant came inside where they began to argue. She advised that the defendant choked her and grabbed her arms. Det. Cox advised he did see marks on her arms but not on her neck. After a while the other girl returned with the defendant's gun and gave it to him. She advised the defendant gave the other girl another gun at that point. The victim advised she got in her vehicle to leave and the defendant began shooting at her as she drove away. She advised all the windows were shot out except one. She advised her vehicle is a silver 2011 Chevy Cruze.

The [REDACTED] advised she parked down the street and called 911 and the operator told her to leave the area, but she did not. She advised she could still see the residence from where she was parked and observed the other girl bring out one of the defendant's big guns and put it in a vehicle. At that point both the defendant and the other girl left the area in separate vehicles. She advised she followed the defendant until the motor vehicle crash.

On 05/27/2020 at approximately 1438 hours, a 2013, Chrysler 300, white in color, 4 door, VIN # 2C3CCAEG3DH621139, bearing a MO temporary license of 04TVX5 (06/13/2020) was traveling westbound on US-24 Hwy. at a high rate of speed after shooting at the vehicle of

another subject. As the 2013 Chrysler was westbound at Sterling, it was in the left hand through lane and ran through the red light. As the Chrysler entered the intersection, a southbound 2013 Kia, Soul, Gray in color, VIN# KNDJT2A60D7553609 was southbound in the right hand lane. The Chrysler was traveling at a high rate of speed and struck the Kia in the driver's side. The driver of the Kia, Mari McElyea, died on scene as a result of the crash. The driver of the Chrysler was identified as the defendant and was hospitalized as a result of the crash. The crash occurred inside the limits of the city of Independence, in Jackson Co, MO.

The defendant's criminal history shows numerous arrests and/or charges in Kansas for aggravated assault with a weapon. It showed felony convictions in Kansas for same. The defendant shows to have a valid driving status through Missouri DOR.

T. Burchfield 1470

/S/ T. Burchfield 1470

Print Name

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge