

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

POLICE NO. :	20-2297
PROSECUTOR NO. :	095460694
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

DETERICE R DOSS

8426 Lane Place

Kansas City, MO 64138

DOB: 11/04/2002

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 August 10, 2020, in the County of Jackson, State of Missouri, Lucas Jester was killed by being shot as a result of the attempted perpetration of the class A felony of Robbery in the First Degree under Section 570.023, RSMo committed by the defendant on or about August 10, 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.

State vs. Deterice R Doss

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 on or about August 10, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count 1, 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.

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/ Hallie L. Williams

Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
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WITNESSES:

1. Aaron Hixon, 10000 E. 59th Street, Raytown, MO 64133
2. Erica Hopper, 10000 E. 59th St., Raytown, MO 64133
3. PO Larry Jackson, 10000 E. 59th Street, Raytown, MO 64133
4. Brandon Jeffrey, 10000 E. 59th St., Raytown, MO 64133
5. Brandon Meyer, 10000 E. 59th St., Raytown, MO 64133

Probable Cause Statement Form

Date: 09/10/20

Report: 20-2297

I, Detective L. Jackson, 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 08/10/20 at 8494 Lane Drive., Raytown, Jackson County, Missouri, 64138, Deterice Doss, a black male born 08/08/02, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 8/10/2020 at approximately 2123 hours, Raytown Missouri Police Officers were dispatched to the area of 8494 Lane Drive, Raytown, Missouri 64138 regarding the sounds of gunshots.

Upon arrival, Officers located a 2018 Chevy Equinox bearing Missouri tag EC8D4B (VIN: 3GNAXXEU2JS558003) parked in a parking space of the apartment building with the front passenger door and rear driver's door ajar. A deceased white male, identified as Lucas N. Jester, a born 01/08/2001, was located in the vehicle's driver's seat suffering from apparent gunshot wounds.

During the investigation, it was discovered Xzaveion King and Aaron Hays were with Lucas N. Jester during the homicide. Witnesses advised the homicide of Lucas N. Jester was the result of a "drug deal gone bad" between Xzaveion and Lucas Jester. Witnesses reported that Xzaveion King utilized the moniker/street nickname "X" and was the creator and user of Snap Chat Account username Goldenx.1. Witnesses showed electronic communications showing Lucas N. Jester's Snapchat user account (pope_jester) to be in direct contact with Xzaveion King's Snap Chat user account (Goldenx.1), minutes prior to his homicide.

Surveillance video from the scene, showed Lucas N. Jester arriving at the address in silver Chevy Equinox, with a white male passenger, believed to be Aaron M. Hays. A black male clad in a red hoodie could be seen approaching Lucas Jester's vehicle and talking/communicating on his cell phone, immediately following Lucas Jester's arrival at the scene. The black male is later seen entering the back seat of Lucas N. Jester's vehicle. The black male was later identified to be Xzaveion King

On 08/12/20 Aaron M. Hays was interviewed. Aaron Hays admitted to arriving on scene and being in the vehicle with Lucas at the time of the homicide. Aaron Hays confessed that Lucas and he had arrived at the scene to sell "2 ounces" of marijuana, valued at \$400.00 USD, to an "unknown/unidentified friend of Lucas." The unidentified friend was believed to be and later identified to be Xzaveion King./Goldenx.1./"X)." Aaron Hays reported the homicide of Lucas Jester was the result of a drug deal that went bad.

A lawful search of Lucas Jester's Snap Chat account (pope_jester) showed him to be in direct communication with Xzaveion's King Snap Chat account username (goldenx.1), minutes prior to Lucas Jester's homicide. The geographical coordinates of such communication matched the geographical coordinates of where Lucas Jester's homicide had occurred.

A lawful search of Xzaveion's Snap Chat user account (goldenx.1) showed Xzaveion to be in direct communication with Lucas Jester's Snap chat account (pope_jester), minutes prior to his death. The

geographical coordinates of such communication matched the geographical coordinates of where Lucas Jester's homicide had occurred.

On 09/08/20 a question and advisory order was made for Xzaveion King. Contact with Xzaveion King's mother, Dominica Adams was made at her residence. Ms. Adams was advised of Xzaveion King's stop order and encouraged to contact and advised Xzaveion King to voluntarily contact me.

At approximately 1230PM, Ms. Adams contacted me and advised that Xzaveion King and she were enroute to Raytown Headquarters to talk to me. Upon arrival, Mr. King was escorted to an interview room, and advised of his Miranda Rights. Xzaveion King acknowledged he understood his Miranda Rights and signed a Miranda Rights waiver form. Xzaveion King confessed to contacting Lucas Jester via Snapchat, and arranging and scheduling the purchase of two zips (a zip is a slang term used by drug dealers/buyers to indicate a single ounce of marijuana. The marijuana is usually stored in a zip lock sandwich bag and has a total street value of \$200/zip.) Xzaveion King confessed to sending Lucas Jester his address of 8494 Lane Place via snap chat. Xzaveion King confessed to seeking out his friend Deterice Doss, a black male born 08/08/02, to assist him in inspecting the marijuana that he was going to purchase from Lucas Jester. Xzaveion King confessed to Deterice Doss and him each receiving one zip (an ounce of weed) from Lucas Jester, to inspect for quality. Xzaveion King confessed, that while inspecting the weed, he witnessed Deterice Doss remove a firearm from his waist band and point it at Aaron Hays' head/neck. Xzaveion King confessed to hearing a single gunshot and believed that Deterice Doss had fired that shot. Xzaveion King confessed to knowing Deterice Doss had a history of robbing individuals at gunpoint and had direct knowledge about the firearm used by Deterice Doss during the homicide, to be the exact same firearm that had been stolen during an armed robbery by Deterice Doss, months prior. Xzaveion King confessed to knowing Deterice Doss was going to rob Lucas Jester upon seeing him pointing his gun at Aaron Hays' neck. Xzaveion King confessed to fleeing the scene with the marijuana and later flushing it down the toilet.

On 09/10/20 at approximately 1035 hours, Raytown Police Officers, Det. Sgt. Rogers and I responded to Deterice Doss' listed address, 8426 Lane Place, Raytown, MO., 64138, and made contact with Ms. Doss (mother of Deterice Doss). Ms. Doss was advised of my reasoning for coming to her home (investigating a homicide) and asked if Deterice Doss was present. Ms. Doss affirmed Mr. Doss was present at the home. Contact with Deterice Doss was made outside of the home, where Deterice Doss was apprehended, and transported to Raytown Police Headquarters. While at Police Headquarters, Deterice Doss was escorted to an interview room, and advised of his Miranda Rights. Deterice Doss acknowledged he understood his Miranda Rights, and signed a Miranda Rights Waiver form. Deterice Doss confessed to knowing and willingly participating in an illegal drug purchase with Xzaveion King, Lucas Jester, and Aaron Hays. Deterice Doss reported that Xzaveion King arranged and set up a marijuana purchase with Lucas Jester, via Snapchat, and asked him to join him and "be a witness". Deterice Doss confessed that prior to him participating/being a witness to/in the illegal drug purchase, Xzaveion King told him about his intentions of robbing Lucas Jester of his drugs, via stabbing him with a knife and running away with his drugs. Deterice Doss confessed to willingly and knowingly carrying a firearm on his person, during the illegal drug purchase. Deterice Doss confessed to using his firearm (shooting it) on Lucas Jester in "self-defense" and later fleeing from the vehicle while carrying the said firearm. Deterice Doss reported Xzaveion King had also fled from the vehicle and later met up him nearby. Deterice Doss confessed to later calling his mother, informing her about the shooting incident and asking her to come and pick up Xzaveion King and himself from the area where Xzaveion King and

he had ran to after the shooting. Deterice Doss reported that his mother (Ms. Doss), after picking Xzaveion King and he up, brought Xzaveion King and he to his residence; where he later disassembled said firearm and hid its pieces in his bedroom's air ducts.

A criminal history records check was performed on Deterice Doss, revealing him to have no criminal history.

Name: Larry Jackson

Signature: /s/ Larry Jackson