

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

<b>POLICE NO. :</b>	21-000089
<b>PROSECUTOR NO. :</b>	095462790
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	
	)	
<b>vs.</b>	)	
	)	
<b>DESMOND C. RICHARDSON</b>	)	
<b>8302 Hilcrest Rd., Apt #D</b>	)	<b>CASE NO. 2116-CR</b>
<b>Kansas City, MO 64138</b>	)	<b>DIVISION</b>
<b>DOB: 05/06/1991</b>	)	
<b>Race/Sex: B/M</b>	)	
<b>████████████████████</b>	)	
	)	
<b>DEFENDANT.</b>	)	

**COMPLAINT  
WARRANT REQUESTED**

**Count I. Murder 1st Degree (565.020-001Y20200902.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about January 13, 2021, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Etta C. Mckenzie by stabbing her.

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 (571.015-001Y20205299.0)**

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 January 13, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count One, all allegations of which are incorporated herein by reference, and

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the defendant committed the foregoing felony of murder in the first 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years.

### **Count III. Murder 1st Degree (565.020-001Y20200902.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about January 13, 2021, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Kenneth Mckenzie by stabbing him.

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 IV. Armed Criminal Action (571.015-001Y20205299.0)**

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) (571.015.2) (571.015.3), RSMo, in that on or about January 13, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count Two, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the first 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years.

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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  
321 West Lexington Avenue  
Independence, MO 64050  
(816) 881-4592  
jbaldwin@jacksongov.org

**WITNESSES:**

1. LT Paul Beitling, 10000 E. 59th Street, Raytown, MO 64133
2. SGT Nathan Brand, 10000 E. 59th Street, Kansas City, MO 64133
3. PO Robert Fox, 10000 E. 59th St., Raytown, MO 64133
4. TPR Travis Goolsby, 504 E. Blue Pkwy, Lees Summit, MO 64063
5. CPL Thomas Greer, 10000 E. 59th Street, Raytown, MO 64133
6. PO Rodolfo Hernandez, 10000 E. 59th St., Raytown, MO 64133
7. DET Erica Hopper, 10000 E. 59th St., Raytown, MO 64133
8. PO Larry Jackson, 10000 E. 59th Street, Raytown, MO 64133
9. [REDACTED]
10. Etta C. Mckenzie, 8324 Hedges Ave, Kansas City, MO 64138
11. [REDACTED] 12th St, Floor 11, Kansas City, MO 64106
12. [REDACTED]
13. Kenneth Mckenzie, 8324 Hedges, Raytown, MO 64138
14. DET Brandon Meyer, 10000 E. 59th St., Raytown, MO 64133
15. PO Reed Nelson, 10000 E. 59th St., Raytown, MO 64133
16. CPL Brandon Parker, 504 E. Blue Pkwy, Lees Summit, MO 64063
17. SGT Jared Rogers, 10000 E. 59th Street, Raytown, MO 64133
18. [REDACTED]
19. TPR Ryan Wilhoit, 504 E. Blue Pkwy, Lees Summit, MO 64063
20. PO Joe Wise, 10000 E. 59th St., Raytown, MO 64133
21. TPR Matthew Yoder, 504 E. Blue Pkwy, Lees Summit, MO 64063

Probable Cause Statement Form

Date: 01/27/21

Report: 21-0089

I, Detective B Meyer, 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 01/13/21 at 8324 Hedges Avenue, Raytown, Jackson County, Missouri, 64138, Desmond C. Richardson, B/M, 05/06/91, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 01-13-21, at approximately 0157 hours, Raytown Police Dispatch received a 911 call from Kenneth McKenzie who sounded in distress and stated "Des" before repeating "help 911, help 911". Raytown officers were dispatched to the address on a nature unknown call but prior to arrival another call was received from Mr. McKenzie who stated "help 8324 Hedges my nephews here" and again stated "help, help". Officers arrived and shortly after advised they heard gunshots from inside the residence.

Officers surrounded the residence and were able to observe a naked black male inside covered in blood. After approximately 1 hour that male, Desmond Richardson exited the residence through the front door suffering from multiple gunshot wounds and was transported to the hospital in critical condition.

Officers entered the residence and located Mr. McKenzie deceased in the basement suffering from multiple stab wounds to his face, chest and back with a five shot revolver lying on the floor under his left hand. Officers exited the residence at that time and notified investigations.

Upon their arrival Raytown Detectives began to gather vehicle information for vehicles parked in the open garages of the residence and two vehicles parked in the driveway. Three of the vehicles belonged to Mr. and Mrs. McKenzie. One vehicle, a maroon Jeep Compass with no plates responded back in the police computer as stolen after being taken in a strong arm carjacking in Kansas City Missouri approximately two hours before the initial 911 call. Mr. Richardson's wallet was in plain view on the passenger seat of this vehicle.

After obtaining a search warrant Troopers with the Missouri State Highway Patrol entered the residence to begin processing the crime scene due to its large size. Upon entry the Troopers located Etta McKenzie in the upstairs NW bedroom on the floor next to her bed deceased. Mrs. McKenzie was also suffering from multiple stab wounds to her face, neck, back, hands and head.

Raytown Detectives and the Troopers then processed the scene locating an additional revolver and blood soaked knife in front of a basement chair opposite of where Mr. McKenzie's body was located. Also near Mr. McKenzie was his Apple iPhone 11 that was used to call 911. Blood was found throughout the residence including in the garage, kitchen, living room, main level hallways, northwest bedroom, stairs, downstairs living room, bar area, both downstairs bathrooms and the downstairs southernmost

bedroom. The largest concentrations of blood were located in the upstairs living room and bar area downstairs where Mr. McKenzie's deceased body was located.

In the living room upstairs several pieces of furniture were moved and it appeared there was a struggle. On the backrest of a chair located on the eastern wall of the upstairs living room a piece of apparent human tissue approximately one inch by one inch was located. A blood trail leading to the northwest bedroom was visible on the walls and the bedroom door appeared to have been forced open with pieces of the door jamb lying on the floor. Blood was visible on the back of the door that appeared as if someone was holding the door closed from the inside.

Inside the northwest bedroom a table that had been previously in the middle of the room was moved several feet resulting in several items scattered across the floor. On the floor at the foot of the bed leading to Mrs. McKenzie's body was a bloody palm print that appeared as if someone was crawling on the floor or had fallen. Between the left side of the bed and a cabinet Mrs. McKenzie was hunched over deceased on the floor. Under her body was a large meat cleaver and a small paring knife both with apparent blood on them. Directly above Mrs. McKenzie was a bullet hole in the ceiling and investigators located one spent 22 caliber projectile along the southern wall of the room.

In the southwest corner of the downstairs living room Mr. McKenzie was seated and surrounded by a large pool of blood. The revolver located near his left hand contained five spent .38 special casings. Directly across from Mr. McKenzie were two bullet holes in the eastern living room wall and two additional bullet impacts were located in the northeastern corner of the downstairs living room.

In the bar area near Mr. McKenzie's body a red cup with apparent blood on it and a kitchen knife were located. In front of a green chair also in the northeastern corner of the downstairs living room were a knife and 22 caliber revolver covered in apparent blood. This revolver contained one spent casing, four live rounds and one empty chamber.

In the northern downstairs bathroom investigators located camouflage pants, a long sleeve gray Nike shirt and black Nike shoes along with apparent blood. These clothing items matched the suspect description from the carjacking vehicle located in the driveway.

On 1-14-21 an autopsy was conducted on Mr. and Mrs. McKenzie. The preliminary anatomic diagnoses from the Jackson County Medical Examiner's Office of Mrs. McKenzie showed multiple sharp force injuries including incised wounds of the scalp, face and hands. Along with stab wounds to Mrs. McKenzie's posterior neck and torso including a transection of the upper cervical spinal cord. Mrs. McKenzie also suffered multiple bite marks to one of her arms.

Mr. McKenzie's exam showed multiple sharp force injuries including multiple stab wounds of the torso resulting in wounds to his right lung and spleen resulting in a right hemothorax. Additionally multiple incised wounds of the head, neck and left arm were found. Mr. McKenzie also suffered a bite to one of his arms. Both Mr. and Mrs. McKenzie's manner of death were classified as homicide.

On 1-21-21 Detectives Meyer and Hopper with the Raytown Police Department conducted a recorded interview of Mr. Richardson who was being treated at Research Medical Center for the injuries sustained from this event. After reading Mr. Richardson his Miranda warning and providing a copy for him to read he signed the waiver and agreed to speak with the Detectives.

During the interview Mr. Richardson explained how he had “borrowed” the vehicle located in the driveway and went to his Aunt Etta’s house looking for his daughter. Mr. Richardson stated shortly after his arrival his Aunt let him into the house and they began to talk in the living room. Mr. Richardson stated his Aunt stated “now Des” so he went and got a knife from the kitchen and put it down in front of them on the table. Mr. Richardson stated he told his Aunt Etta, “I don’t really care about my life, I know you don’t really care about yours because you wouldn’t have taken my daughter and burnt her without my permission”.

Mr. Richardson stated his Aunt told him his daughter was in the garage so he went to the garage and he saw his Aunt walking the other way. Mr. Richardson described his Auntie trying to go into her room so he “pulled her and said no no no”. Mr. Richardson stated “the knife that I had had, it wasn’t no real getcha getcha knife, it was just a scary little knife kitchen utensil like a plastic one”. Mr. Richardson later described the knife he obtained as “stubby but longer” and elaborated the blade was “pretty wide”. He also stated that “he had never stabbed anyone so he didn’t know this is the type of blade you get to do certain things like this”.

During this time Mr. Richardson stated his Uncle had come up from the basement and they all started “tussling” in the living room. Mr. Richardson clarified that when I say “tussling, I mean we were fighting at that point”. Mr. Richardson stated he didn’t have a knife at that point but “I was trying to get the knife back from them to use it because I was tussling with them”.

When I asked Mr. Richardson how many times he cut his Aunt he stated “I don’t know, the first time I tried to cut her it didn’t”. He stated he didn’t get a good knife and that’s why he had trouble. Mr. Richardson also stated “I’m not a pin point knife cutter, If I did bring a knife in there at a different time, I could have and I haven’t pin pointed the thought yet, I really don’t care”. Mr. Richardson continued “actually I did go grab another knife now that I think about it because it wasn’t sharp enough”. Mr. Richardson demonstrated a slashing motion with his right hand and stated “like a slash” when I asked how he tried to cut her. Mr. Richardson stated all he remembered about his Aunt Etta was some blood coming from her forehead, “it wasn’t like you could see a cut, like the skin came off”. It’s believed the skin located on the back of the chair came from between Mrs. McKenzie’s eyebrows and nose area.

Once we got done tussling and “I finally let both of them up, Mr. McKenzie went downstairs and she went in her”. Mr. Richardson stated after following his Aunt to her room she “shot” him in the head but he didn’t feel anything. He stated he was “shocked he wasn’t dead”. When I asked Mr. Richardson what he was doing to defend himself he stated “I didn’t really think all like that, I just kicked her down, I knew she was done after she shot me”. Mr. Richardson did not suffer a gunshot to the head the night of this incident.

After taking the gun from his Aunt and while holding a knife in his other hand he went downstairs to prevent his uncle from getting his gun. As Mr. Richardson walked down the stairs he stated he saw his Uncle seated on a chair talking on the phone. When asked what he thought Mr. Richardson stated "I just walked up on him, straight forward like it's going to be both me and his last days". Mr. Richardson stated after his Uncle let loose "honestly I thought I was invincible to bullets because he didn't see no bullet wounds". When asked why he didn't shoot at his Uncle after he shot him Mr. Richardson stated "I don't believe in guns, if you're going to do something I always said I just wanted to do it the right way". "I know there's an easier way with guns but I'm just not a gun person". I asked Mr. Richardson what "the right way" means and he stated "like I get it done' fast, pow", "that's like naw man that's your gun that's not my gun if god wants you to kill me god wants you to kill me if god wants me to win with this knife and the little bit of stuff I got then he wants me to win that way, ain't no real thought processes to me like". Mr. Richardson also stated he feels more nervous to use a gun rather than a knife and that he had "never done anything like that before regardless".

Mr. Richardson stated after his Uncle shot him and he "didn't die so he cut him". He saw the blood when he and Mr. McKenzie were gasping for air after Mr. Richardson got a drink of water downstairs.

When asked about the knives found throughout the residence Mr. Richardson stated he didn't believe he had used four knives. That he never really got to going "yah yah yah" as he waved his arms back and forth in what I would describe as stabbing someone with both hands. Mr. Richardson stated "I can tell you that never happened, I would have been very happy if I could do that, but that didn't happen".

Mr. Richardson stated "like the first cut I thought one cut I thought it was supposed to be over, guess I had a lot to learn". Mr. Richardson stated "I thought one cut...ok bleed out and be done I would have never thought in a million years they would have enough time or the strength to be able to go get a gun or a knife".

Mr. Richardson was charged with Vehicle Hijacking related to the vehicle found in the driveway after being positively identified by the victim.

Name: Brandon Meyer

Signature: /s/ Brandon Meyer

