

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC21007851
PROSECUTOR NO. :	095462896
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
KEAIRE L. MARTIN)	
8120 Walnut Street)	CASE NO. 2116-CR
Kansas City, MO 64131)	DIVISION 1
DOB: 09/20/1982)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

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 4, 2021, in the County of Jackson, State of Missouri, the defendant knowingly, or with the purpose of causing serious physical injury to Dionte L Harris, caused the death of Dionte L Harris by shooting him.

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 (571.015-001Y20205299.0)

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 February 4, 2021, in the County of Jackson, State of

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Missouri, the defendant committed the felony of Murder in the Second Degree as charged in Count 1, all allegations of which are incorporated here 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 571.015.1, 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen 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 five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. (565.050-001Y20201399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about February 4, 2021, in the County of Jackson, State of Missouri, the defendant attempted to kill [REDACTED] by shooting her, and in the course thereof defendant inflicted serious physical injury on [REDACTED].

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 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, RSMo, in that on or about February 4, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree as charged in Count 3, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Assault in the First 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 571.015.1, 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen 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 five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. Unlawful Possession Of A Firearm (571.070-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about February 4, 2021, in the County of Jackson, State of Missouri, the defendant knowingly possessed a revolver, a firearm, and

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on 7/10/07 he was convicted on delivery and manufacturing of a controlled substance, a felony, on case number 0716CR0024001 and sentenced to 7 years.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); 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 more than double the amount of the offender's gain from the commission of the crime.

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/ P. Benjamin Cox
P. Benjamin Cox (#60757)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, MO 64106
(816) 881-3975
BCox@jacksongov.org

WITNESSES:

1. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. Dionte L Harris, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
6. [REDACTED] Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
9. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
10. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

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11. [REDACTED]
[REDACTED]

[REDACTED], Kansas City, MO 64106

13. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02-05-2021

CRN: KC21007851

I, Detective J. Mutschler #5594 (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 02/04/2021, at 8145 Lydia Ave in (Date) (Address)

Kansas City, Jackson Missouri Martin, Keaire L (County) (Name of Offender(s))

Black Male 09/20/1982 committed one or more criminal offense(s). (Description of Identity)

- Murder
Agg Assault
ACA x 2
Felon in Possession

The facts supporting this belief are as follows:

On 02/04/2021 at approximately 1458 hours, Officers were dispatched to 8145 Lydia Ave Kansas City, Jackson County, Missouri in regard to a reported shooting. Upon arrival, the Officers observed the screen door closed with a panel missing, but the interior door was wide open. Officers announced at the door, and two males later identified as [redacted] and [redacted] entered the living room from the attached garage. Officers cleared the residence and observed a male deceased in the basement along with female suffering from gunshot wounds. The female victim was transported to an area hospital. Medical personnel stated she had gunshot wounds to the head, chest and arm listing her in critical condition and remains in critical at this time.

Detectives made contact with [redacted] who advised the following: When he arrived to 8145 Lydia Ave, Kansas City, Jackson County, Missouri, he was approached by [redacted] who told him someone had been shot in the residence. [redacted] stated [redacted] told him "Bear" shot "Dip" (male victim). [redacted] stated he has known "Bear" for a long time. "Bear" was later identified as Keaire Martin B/M 09/20/1982. [redacted] was shown a photo of Martin and [redacted] confirmed Martin was who he was referring to as "Bear". [redacted] stated he has known Martin to carry a .38 caliber revolver. It should be noted no shell casings were located at the crime scene supporting [redacted]'s knowledge of Martin to carry a revolver.

[redacted] stated "Bear" came to the residence and went down in the basement where the two victims were. [redacted] stated the only people in the basement were "Bear" and the two victims. [redacted] stated he then heard arguing coming from the basement and then heard gunshots. [redacted] stated he went outside and a short time later "Bear" exited the residence and left north on foot. [redacted] was shown a photo line-up of 6 males similar in appearance with Martin in the #3 position. The remaining 5 spots were unrelated fillers. [redacted] identified Martin as the person he was referring to as "Bear".

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On 02-05-2021, **Martin** was arrested at 3144 Hardesty Ave, Apartment #2, Kansas City, Jackson County, Missouri, the residence of [REDACTED]. [REDACTED] stated **Martin** arrived at her house on 02/04/2021 around 1700 hours. [REDACTED] stated **Martin** was crying and stated he did "something bad". [REDACTED] stated **Martin** would not tell her what he did but told her to watch the news. [REDACTED] stated **Martin** stayed at her house overnight. [REDACTED] stated on 02/05/2021 **Martin** told her he killed someone and it was because they owed him money. [REDACTED] stated **Martin** told her he shot a male and also shot a "white girl" who was in the hospital. [REDACTED] stated **Martin** told her he threw the gun in a garbage dumpster. [REDACTED] stated when the police showed up to arrest **Martin**, he tried to hide his shoes in her apartment.

Martin was transported to Police Headquarters and after waiving his Miranda Rights, **Martin** confessed to shooting both victims with a .38 caliber revolver. **Martin** stated the victim's stole his money the day prior and he did not realize it until the following day. **Martin** advised he went to confront the victims and stated "I let rage get the best of me". **Martin** stated when he initially shot the victim's, he shot with his eyes closed and then opened his eyes and shot her two more times. **Martin** stated "had to finish what I started". **Martin** was asked if he meant he wanted to kill them which he ultimately replied yes.

Martin has an extensive criminal history and is a convicted felon. On 4/14/03 he was convicted for Possession of a Controlled substance on case number 16CR0200718101 and sentenced to 3 years. On 7/10/07 he was convicted on delivery and manufacturing of a controlled substance on case number 0716CR0024001 and sentenced to 7 years.

Printed Name Sergeant Janice Heins #4415 Signature /S/ Sgt. Janice Heins #4415

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

Judge

Circuit Court of _____ County, State of Missouri.