


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

POLICE NO. :	KC21008440
PROSECUTOR NO. :	095462928
OCN:	HS024561

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MARVINA STEMMONS)	
4937 Bellefontaine Ave.)	CASE NO. 2116-CR
Kansas City, MO 64130)	DIVISION 1
DOB: 12/03/1990)	
Race/Sex: B/F)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 7, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Charles Harris, caused the death of Charles 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.

State vs. Marvina Stemmons

Count II. Armed Criminal Action (571.015-001Y20205213.0)

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 7, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the 2nd 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 2nd 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.

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.

State vs. Marvinna Stemmons

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] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. CST Leah Davis,
3. [REDACTED]. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. PO Kevin M. Green, 1125 Locust, Kansas City, MO 64106
5. Charles Harris, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
7. PO Robert L. Kern, 2640 Prospect Ave., Kansas City, MO 64127
8. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
9. C [REDACTED]
[REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
11. PO Austin L. Moats, 1125 Locust, Kansas City, MO 64106
12. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
13. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
14. CST Greg VanRyn, 6633 Troost, Kansas City, MO 64131

PROBABLE CAUSE STATEMENT FORM

Date: 02-09-2021

CRN: KC21-008440

I, Detective Mary Kincheloe #5063
(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 02-07-2021, at 4025 Wabash in
(Date) (Address)

Kansas City, Jackson Missouri Stemmons, Marvinna L. B/F 12-03-1990
(County) (Name of Offender(s))

5'01", 150lbs, Blk hair, Brown eyes, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 02-07-2021, at 0412 hours, Officers of the Kansas City Missouri Police Department were dispatched to 4025 Wabash on a reported shooting. Upon their arrival, the victim, later determined to be Harris, Charles B/M 01-01-1973, was observed deceased on the couch in the living room with an apparent gunshot wound.

Two witnesses from inside the residence were identified. [REDACTED] advised the victim was his cousin. [REDACTED] said the victim was at his residence earlier in the day on 02-06-2021 and left to work on a friend's furnace. When the victim returned to [REDACTED]'s residence he had the suspect with him. [REDACTED] described the suspect as a dark skinned, black female, 5'04", medium build, with an afro about 3-4 inches long. [REDACTED] described the suspect as wearing lime green and white tennis shoes with something wrapped in her hair. [REDACTED] observed the suspect retrieve a white firearm from a black bag she was carrying and said she described it as being a .380. [REDACTED] said the two (victim and suspect) left in his mint green Ford Focus to go the pool hall in Raytown, MO to celebrate with another cousin, later identified as [REDACTED]. [REDACTED] said he went to bed and was awakened to the sound of a gunshot. He retrieved a baseball bat and went downstairs where he observed his front door open and the victim slumped over on the couch. There was nobody else in the residence.

[REDACTED] the second witness in the residence, also described the suspect as being a black female, 5'04", medium build, short afro, wearing black jeans, with a scarf tied in her hair, carrying a black bag. [REDACTED] described the suspect as showing [REDACTED], the victim and [REDACTED] her white firearm while in the living room of [REDACTED]'s residence. [REDACTED] said she told the suspect to put the firearm away because there were kids in the home. [REDACTED] said they left and she and [REDACTED] went to bed. [REDACTED] said around 0330 hours, she heard the victim knocking on the front door asking for [REDACTED] [REDACTED]. [REDACTED] said she assumed the victim remembered he had a key to the front door because she said she heard him come inside the residence. [REDACTED] said somebody came upstairs to use the restroom, but she did not see who. She said about 10-15 minutes later, she heard the sounds of a gunshot [REDACTED] said she did not hear anything until the gun was fired. On 02-09-2021, [REDACTED] was presented with a photographic lineup in which [REDACTED] identified **Marvina Stemmons, B/F 12-03-1990** as the unknown female who had been at her house earlier in the night with the victim.

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█. was located and advised the following: the victim arrived at 10012.5 E. 63rd Street in Raytown with the suspect where █ █. were DJ'ing. █. said she had never seen the suspect before and did not pay attention to her name. █. described the suspect as a black female, 5'04", 150 pounds wearing a green camouflage jacket, black pants and lime green shoes. █. said she was wearing a pink bow in her hair. █. said the victim described the suspect to █. as the "real deal" and a "real gunner." █. said the victim had the suspect show █. her firearm which she was carrying in a black pouch. █ said she did not pay attention to it, but confirmed she saw a firearm in the black pouch being held by female █ said the two seemed to be getting along, but was not sure when they left.

█. confirmed the suspect was a black female, approximately 5'02", 145 lbs, with an afro. █ said she had a pink bow tied in her hair and was wearing a green camouflage jacket with green shoes. On 02-09-2021 █ was presented with a photographic lineup in which █. identified **Stemmons, Marvina B/F 12-03-1990** as the unknown female with whom she had seen at the pool hall with the victim.

█ advised the victim came over to his house on 02-06-2021 at 2000 hours with an unknown black female in which he described as medium complexion, medium afro with a black hair band around her head, 5'1", medium build approximately 25 to 30 years of age. █. stated the suspect was wearing a black jacket, black pants, and lime green shoes █. was advised the suspect went by "Moo Moo." █. said the victim asked him to take photographs of the victim and suspect on the victim's phone. █. said he observed the suspect to be armed with a white firearm and said she stated she "is always armed." On 02-09-2021 █ was presented with a photographic lineup in which █. identified **Stemmons, Marvina B/F 12-03-1990** as the unknown female with whom accompanied the victim at his house.

A view of the Genetec cameras revealed the vehicle owned by █. but reportedly occupied by the victim and suspect to be traveling north on Prospect and then turn west on 41st Street on 02-07-2021, at 03:19:45 hours.

The crime scene was processed for items of evidentiary value which included a green camouflage jacket recovered from the couch in which the victim was found deceased.

A search of the victim's phone revealed several photographs taken during the timeframe previously described by █. The female depicted in the photograph was consistent with what witnesses had described her appearance to be. A computer search of the contact number in the victim's phone titled "MowMow" revealed it belong to **Stemmons**. A computer search of **Marvina Stemmons B/F 12-03-1990** revealed a DOR photograph which appeared to be the same female depicted in the victim's photographs contained in his cell phone. A continued search of the victim's phone revealed a text message from "MowMow" asking the suspect to pick her up at 4937 Bellefontaine on 02-06-2021. A computer search of NICHE report writing system revealed **Stemmons** listed her home address as 4937 Bellefontaine on 11-10-2020.

On 02-07-2021, a Pick Up order was issued for **Stemmons, Marvina R. B/F 12-03-1990**. On 02-09-2021, at 1240 hours, **Stemmons** was taken into custody at 4937 Bellefontaine.

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On 02-07-2021, **Stemmons** was escorted to a 7th room interview room. At 1543 hours, **Stemmons** was read aloud Miranda Rights and agreed to speak with detectives. **Stemmons** said she had been with the victim prior to the homicide and only learned of his death over the news the next day. **Stemmons** confirmed the places she had been with the victim on 02-06-2021 which was consistent with witness statements. She denied being in possession of a firearm. **Stemmons** said after the pool hall, the victim took her home around 0300 hours, not stopping anywhere en route. When asked if the victim had made any sexual advancements toward her throughout the night she said “yes” but described him as being respectful when she told him no. She acknowledged she kissed his check, he kissed hers and then he “snuck one on the lips.” **Stemmons** reiterate that the victim had taken her straight home after the pool hall. When presented with witness statements, **Stemmons** continued to deny she returned to the home of [REDACTED]. after the pool hall and denied brandishing a white firearm. Over the course of the interview, **Stemmons** did eventually acknowledge she returned to the home of [REDACTED]. **Stemmons** said she was seated on the couch with the victim and had kicked off her shoes. She said the victim gave her his firearm and told her to hold it after he removed the magazine. The victim then began rubbing on **Stemmons** leg and said “I’m going to get me that pussy.” **Stemmons** said she pulled the trigger not expecting the gun to fire, but it did so. She said she heard [REDACTED] yelling the victim’s name, so she picked up her shoes and ran all the way home barefoot. Upon further questioning about her possessing her own white firearm as previously described by witnesses, **Stemmons** continued to deny it. However, **Stemmons** eventually admitted she did not shoot the victim with his own firearm nor did he give her his firearm to hold. **Stemmons** said she did possess her own white firearm as described by the witnesses. She said she was removing the magazine and putting it in her shoulder bag when the victim leaned his body on the side of hers and began rubbing her leg. **Stemmons** said she told him to “stop” at which time the victim grabbed her “private part” over the clothing. **Stemmons** said the victim began to put his hand under the waistband of her pants. At that time, **Stemmons** said her hand was on her firearm in her shoulder bag which was slung around the front of her body. **Stemmons** pulled the firearm from the bag and pulled the trigger. **Stemmons** said she did not know if the victim had been hit or not because it was completely dark in the living room. **Stemmons** said she slid out from under the victim’s body, picked up her shoes and ran home after she heard J.F. calling the victim’s name.

A Preliminary Anatomic Diagnosis report from the Office of the Jackson County Medical Examiner revealed no evidence of close range fire. The course of the bullet is front to back, right to left, and slightly upward.

Printed Name Detective Mary Kincheloe #5063 Signature /s/ Det. Mary Kincheloe #5063

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

Judge

Circuit Court of _____ County, State of Missouri.