


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

<b>POLICE NO. :</b>	21-015312
<b>PROSECUTOR NO. :</b>	095463486
<b>OCN:</b>	QO005220

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ANTHONY C. PASQUALE</b>	)	
<b>200 N.W. 27th Street Court</b>	)	<b>CASE NO. 2116-CR</b>
<b>Blue Springs, MO 64015</b>	)	<b>DIVISION</b>
<b>DOB: 12/27/2000</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**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 March 16, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Xavier E. Plotner caused the death of Xavier E. Plotner 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 (571.015-001Y20205213.0)**

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 March 16, 2021, in the County of Jackson, State of

**State vs. Anthony C. Pasquale**

Missouri, the defendant committed the felony of Murder in the Second 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 571.015.1, 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 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/ Michael J. Hunt  
Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3856  
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**WITNESSES:**

1. DET Tyler Duke, 223 N. Memorial Drive, Independence, MO 64050
2. DET Emily Knox, 223 N. Memorial Drive, Independence, MO 64050
3. Xavier E. Plotner, 1613 SE Abbey, Blue Springs, MO 64014
4. DET John Roach, 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 3/17/2021

Report #: 2021-15612

I, Tyler Duke, 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 3/16/2021, at 1951hrs, Anthony Pasquale, (Race- B, Sex- M, DOB- 12/27/2000, Address-200 NW 27<sup>th</sup> St Ct, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 03-16-21 at 1953 hours, Officers with the Independence Police Department were dispatched to Quik Trip, 16001 E US 24 Highway, on a shots fired call. An unknown calling party had called 911 and reported that shots had been fired and there was a black male in a red hoodie lying in front of the entrance to Quik Trip.

Fire and AMR units arrived on scene and advised the Victim (XP, 11-20-02) had a gunshot wound to the chest and pronounced him deceased at 1956 hours.

Officer Stewart contacted store manager Kaitlyn and began viewing security footage in an attempt to identify a suspect in the shooting. Surveillance footage showed a silver older model sedan, possibly a Honda, pull into Pump #2 facing north at 1950 hours. An unknown race male, later identified as Anthony Pasquale, is seen getting out of the silver sedan and begins to pump gas.

At 1951 hours the Victim is seen pulling into Pump #1 facing south and remains in his car. The Victim arrived on scene driving a 2011 blue Hyundai Genesis, VIN: KMHHT6KD1BU047896, displaying MO temp tag 057XGA registered to Ashlynn Sellars. The Victim does not get out of his car.

Pasquale is seen retrieving an object from inside the silver sedan and approaching the Victims vehicle. Pasquale puts his hand on the Victims car door. The Victim opens the car door and comes out of the car and is seen swinging his fists at the Pasquale. Pasquale goes out of the camera angle for a moment, but when is seen again, he is holding a gun and pointing it at the Victim. The Victim is seen running frantically towards the store, runs face first into the door, and collapses at the west entrance to the store.

At 1952 Pasquale is seen pulling the gas pump from his vehicle, dropping it on the ground, putting his gas cap back on, and leaving the area eastbound on US 24 highway.

Quik Trip surveillance footage shows Pasquale to be an unknown race male wearing a gray hooded sweatshirt, black sweatpants, a COVID mask, with extremely white hands.

There are two separate camera angles of Pasquale pulling into the Quik Trip lot. From those angles Officer Stewart was able to observe a black stripe down the side of the car. He was also able to determine that there was damage to the front end of the vehicle. Officer Stewart was able to observe an emblem on the front of the car that appeared to be a Honda emblem.

Independence Crime Scene Unit was on scene collecting and processing evidence. Upon observation of the Victim's car, Sgt. Howe found in the center console of the vehicle a black semi-automatic Glock 23 handgun. The gun was made safe by Sgt Howe and collected as evidence.

At the back of the car, on the ground, a white Apple iPhone was found. It is believed to belong to the Victim and was collected as evidence.

Detective Roach arrived on scene and made contact with Quik Trip Division Manager E. McGuire in regards to the purchase made at pump number 2. McGuire was able to advise the last credit card purchase made at that pump was at 1951 hours and the name on the card that was used was Anthony Pasquale and the last 4 digits on the card were 8812.

A picture of the suspect vehicle was disseminated to all Patrol Units.

At approximately 2100 hours, Officer Doorman observed a silver Honda traveling southbound on Lees Summit Road from 24 highway. He observed a white Chevy Impala traveling close behind the silver Honda. Officer Doorman turned around at 24 highway and Lees Summit RD and went southbound on Lees Summit due to being dispatched on another call. Officer Doorman passed the silver Honda and white Chevy Impala in the area of Truman Road and 291 Highway. As he passed the silver Honda, he observed it matched the picture of the suspect vehicle from the shooting at Quik Trip. Officer Doorman observed the front-end damage to the vehicle as well as the black stripe down the side.

Officer Doorman conducted a vehicle stop on the silver Honda. The vehicle displayed a Missouri Temporary tag D7704-AJ. A computer inquiry of the temp tag showed it to be registered to Pasquale Auto and Bodyworks LLC on a 1999 Honda Accord. The driver of the vehicle was identified as [REDACTED] [REDACTED] showed to have several municipal warrants for his arrest and was taken into custody.

The Honda was positively identified by Sgt. Gilbertson, as the suspect vehicle in the shooting due to the front-end damage and the black stripe down the side. The card used at Pump #2 belonged to Anthony Pasquale and the temp tag on the Honda was registered to Pasquale Auto Body.

After Sgt. Gilbertson positively identified the vehicle, a person of interest was issued for homicide for the driver, [REDACTED].

The Honda was towed from the scene and stored at the Independence K9 Unit as evidence to be searched after obtaining a search warrant.

At 2105hrs, on 3-16-2021, Officer D. McIntosh, stopped a white Chevy Impala (ND7U7Z) at 291hwy and Hidden Valley Rd. The vehicle was traveling near the vehicle that Officer Dorman had stopped, which was the suspect vehicle from the homicide. Officer McIntosh was able to identify the driver as [REDACTED], and the passenger as Anthony Pasquale. Officer McIntosh was unable to reach any supervisors to verify the involvement that they may have had in the homicide. They were subsequently released from the scene.

On 03-17-21 Detective Roach obtained and executed a search warrant on the 1999 Honda. During a search of the vehicle a red Debit card was found between the front seat and the center console. The name on the card was "Anthony Pasquale" and the last four digits on the card were "8812". Also found in front passenger seat was a red cell phone / wallet case. In the wallet portion a Missouri Driver's License and Social Security card belonging to Anthony Pasquale were found. The Debit card was recovered as evidence.

On 03-17-21 Detective Duke and Knox conducted an interview with [REDACTED] at the Independence Police Department in a 3rd floor interview room. Prior to the interview [REDACTED] was read and signed the Miranda Warning of Rights form.

During the interview [REDACTED] stated he was at his residence, 1704 E. Morgan, Independence MO 64050, on the evening of the 16th. He stated Anthony Pasquale, his cousin, was on the way to his house but was going to stop by Quik Trip first. [REDACTED] advised Pasquale arrived at his house around 2100hrs, driving the 1999 Honda. [REDACTED] advised when Pasquale came into the house he appeared to be in a "panic mode" and had tears in his eyes. Pasquale told [REDACTED] "I fucked up" and asked for a change of clothes. [REDACTED]

advised he did not ask Pasquale any questions but provided him with a change of clothing. He stated he told Pasquale that he needed to call an attorney and "get ahead of this" in the morning.

██████████ advised Pasquale's clothes he changed out of were still on his bedroom floor next to his bed.

██████████ advised he called his other cousin, ██████████, and told him what happened. ██████████ advised ██████████ arrived at his house a short while later driving a white Chevy Impala. ██████████ told ██████████ "take his ass home." ██████████ confirmed they were talking about Pasquale. ██████████ stated that Pasquale and ██████████ got into ██████████ vehicle, a white Chevy Impala. ██████████ stated that Pasquale was seated in the passenger seat of the Impala and ██████████ was driving the Impala. ██████████ stated that he got into, and drove Pasquale's vehicle. ██████████ stated that they were trying to get to Pasquale's girlfriend Zoey's house who lives in Grain Valley. He stated they were on their way to Grain Valley when he got pulled over.

When asked, ██████████ advised he would take Detectives to his house to retrieve Pasquale's clothing.

██████████ signed a consent to search form for his residence, 1704 E. Morgan Road, Independence, Jackson County Missouri 64050.

Independence Detectives Duke and Roach along with Crime Scene Tech J. Myers responded back to ██████████'s residence. While on scene ██████████ pointed to a pile of clothes on his bedroom floor and indicated that those clothes belonged to Pasquale.

Detective Roach assisted CST Myers in recovering the following clothing:

- 1 gray hooded sweatshirt
- 1 pair of black jogger sweatpants
- 1 red long sleeve Chief's shirt
- 1 pair of white gloves
- 1 white surgical mask
- 1 black surgical mask
- 1 pair of headphones

All items were recovered and placed on police property as evidence.

After the interview with ██████████ a stop order was issued for Pasquale for homicide.

Detectives were advised on the morning of 3-17-2021 that Pasquale had arrived at IPD headquarters with his father and an attorney and turned himself in on the stop order of homicide.

Detective Duke and Knox responded to IPD detention and took custody of Pasquale. He was escorted the criminal investigations unit to provide a statement. Pasquale was advised of his Miranda rights which he signed and initialed. Pasquale stated that he did not wish to speak without his attorney present. Pasquale did tell detectives "I am sorry." Detectives escorted Pasquale back to IPD detention and remained on the investigative hold.

On 03/17/21 Det. Knox and Det. Cox contacted ██████████ at her address 1205 NW Willow Dr in Grain Valley, MO. Detectives asked ██████████ if she knew why they were there, and she told me that she did. ██████████ advised that Anthony Pasquale and his dad came to her house last night and he told her what happened.

Detective Cox asked ██████████ to tell me what he had said. She stated that Anthony got off work around 1900 hours and was supposed to come over to see her and his baby. He did not show up, so she tracked him on his Apple iPhone using the find my apple app. She stated that she saw that he was at Quik Trip. ██████████ stated

that she later heard from him because he called her as he was being pulled over by the Independence Police. He told her that he has shot Xavier and he was going to jail.

She stated that the police did not arrest him at that time, and he ended up coming to her house with his dad. She thought that it was around 2200 hours. He told her that he stopped at Quik Trip and Xavier pulled up next to him. He stated that Xavier hit him in the face, and he shot Xavier and then left Quik Trip.

████████ stated that Anthony's friend, Jaden, was killed in Blue Springs a little while back and Xavier had been telling Anthony that he stomped on Jaden's head after he died. Xavier had also been making threats to kill Anthony. She told me that Anthony does carry a gun because he was paranoid that someone was going to try and kill him. She thought it was a semi auto pistol.

████████ further advised that she told Anthony to turn himself in and he agreed to do this. She also told me that Anthony did not know that Xavier was dead until his family started sending him the news articles. Detectives asked her what Anthony's dad was doing during this and she said that he kept saying that he did not know what to do.

████████ told me that Anthony has an iPhone and the carrier is Verizon. She also told me that his phone number is 816-322-2954. I asked her for historical data on the Find Me app. She attempted give it to me but could not figure out how to find that information. We ended the interview with ██████████ It was recorded onto a digital recorder and later placed in the property room as evidence.

Detective Tyler Duke

/S/Tyler Duke #1384

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Print Name

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Signature