


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

POLICE NO. :	21-031436
PROSECUTOR NO. :	095464633
OCN:	qo005747

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
STEVEN B. TURNER JR.)	
413 N 23rd Terr)	CASE NO. 2116-CR
Higginsville, MO 64037)	DIVISION
DOB: 08/19/1976)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 1st Degree (565.020-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 May 23, 2021, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of **Billy M. Davis** by shooting 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 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 May 23, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First 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 First Degree by, with and through, the

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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. Murder 1st Degree (565.020-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 May 23, 2021, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Ashley D. Walker by shooting 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 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 May 23, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree charged in

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Count 3, 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 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Traci A. Stansell
Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4591

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trupstansell@jacksongov.org

WITNESSES:

1. SGT Brice Roger Blackmore, 223 N. Memorial Drive, Independence, MO 64050
2. [REDACTED]
3. PO Matthew Byrum, 223 N. Memorial Drive, Independence, MO 64050
4. DET Chad Cox, 223 N. Memorial Drive, Independence, MO 64050
5. Billy M. Davis Jr., 1586 SE Manor Lake Dr, Lees Summit, MO 64081
6. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050
7. PO Raymond Osenbaugh, 223 N. Memorial Drive, Independence, MO 64050
8. Ashley D. Walker, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
9. [REDACTED]

PROBABLE CAUSE STATEMENT

Date: 5/27/2021

Report #: 21-31436

I, Jeff Pagel, 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 5/23/2021, at 0630 hours, Steven B. Turner, (Race- Black, Sex- Male, DOB- 08/19/1976, Address-413 N 23rd Terr Higginsville Mo 64037, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 5/23/2021 at approximately 0630 hours, the Defendant **Steven B. Turner** did knowingly cause the death of Mr. Billy M. Davis and Ms. Ashley D. Walker by shooting both victims who were inside of a Jeep Renegade SUV parked behind the residence of 105 N. Huttig Ave. Independence, Jackson County, Missouri 64053.

On 5/23/2021 at approximately 0630 hours, Independence Police received a 911 emergency call of an accident at 520 S. Ash Ave. Police also received a 911 call in reference to the sound of shots fired in the area of Kentucky Ave and Huttig about the same time as the reported accident. When Independence Police arrived at the traffic accident (minor front end collision with a parked vehicle), they located a b/m identified as Billy Davis (driver) and Ashley Walker (front passenger) inside of a purple or blue Jeep Renegade SUV that had been riddled with bullet holes and the front driver's side window and rear glass was shattered. Both Davis and Walker had apparent gunshot wounds and later died from their injuries. Officers also responded to the area of Kentucky Ave and Huttig and located several PMC 10mm spent shell casings behind the residence of 105 N. Huttig along an alleyway. Officers also located what appeared to be vehicle window glass on the ground near the shell casings that were located.

Responding officers located juvenile children at the residence of 105 N. Huttig Ave riding bikes behind the house. After brief contact with police, it was determined the children possibly witnessed the incident. The children were forensically interviewed, and information was revealed that a male they knew as "Stevie" was at the residence moments before the shoot occurred. Interviews revealed the kids heard a gun being "racked" and shots being fired behind the house moments after "Stevie" walked out of the house. It was also stated that "Stevie" was seen running from the back of the residence after the sound of the shots being fired.

Through the investigation, investigators contacted several members of Ashley's family; Notably, [REDACTED] [REDACTED] who identified herself as Ashley's cousin and Billy' Davis's girlfriend. When she was asked if she knew a male named "Stevie", she provided the Defendants name. She was then shown a DOR photograph of the Defendant and confirmed that was the male she knew to be "Stevie." She stated the Defendant was friends with Ashley, and often would assist her with paying utility bills. [REDACTED] also stated she knew the Defendant very well and had been around him since they were kids. She was asked about the history between the Defendant and Billy Davis, and she advised they did not get along [REDACTED] did not know exactly what the feud was over but hinted it was about guns and the way Billy acted towards people when he was "High." [REDACTED] also advised that the Defendant had previous shot at Billy on two other occasions. She stated one was at the Embassy Suite Hotel in Kansas City, and the other was at Billy's residence of 610 E. 83rd St in Kansas City.

As the investigations progressed, investigators received NIBIN information that the shell casings recovered at the scene of the shooting from 5/23/21 were matched casings recovered in (5) other incidents in the Kansas City area over the last two years. These incidents include a homicide that occurred in September of 2020, and two other shootings on 4/25/21 and 4/30/21. The incident on 4/25/21 was shell casings recovered from the parking Lot of the Embassy Suite Hotel located at 7640 Tiffany Springs Parkway in Kansas City. The incident on 4/30/21 was in reference to the sound of shots being fired near the intersection of 83rd St and Holmes, which is

right next to Billy Davis's home. Both NIBIN hits are consistent with Erica's statement. Additionally, Erica stated she was with Billy when the incident at Embassy Suites occurred, and that she observed the Defendant arrive in a black Mercedes. She stated she observed the Defendant shoot at Billy.

As the investigation continued, on 5/26/2021 information was obtained that provided a possible address for the Defendant's location of 3560 Broadway Blvd, apt 314, Kansas City Mo. Detectives with IPD, SWAT officers, and US Marshals set up surveillance on the room. As a result of the surveillance, the Defendant was eventually apprehended after throwing a gun, later identified as a Glock 10mm, out of the 3rd story window moments before being arrested. Prior to arresting the Defendant, [REDACTED] [REDACTED] was located inside the apartment with the Defendant. Each subject was interviewed individually by investigators with IPD. Both [REDACTED] and [REDACTED] stated that prior to his arrest, they had seen the Defendant carrying a black handgun inside the apartment.

[REDACTED] was later interviewed at police headquarters. [REDACTED] stated she was the sister of the victim, Ashley Walker. [REDACTED] advised she was in a relationship with the Defendant and had been since she got out of prison. The Glock 10mm gun was described to Jennifer, and she confirmed that was the gun she had known the Defendant to carry. She advised he had the gun when she first met him. [REDACTED] was also asked about the incident where the Defendant had reportedly shot at Billy in the past, and she stated she was with the Defendant the night Billy was at the Embassy Suites. She stated they were in a black Mercedes, and that the Defendant shot at Billy and missed. When asked what she knew about her sister's death, she stated that she thought a guy named "Moe" did it. [REDACTED] advised she was kidnapped on Saturday night 5/22/21 by Moe while she was riding in a car named [REDACTED]. She stated she was set up by Marvin for Moe because she had stolen Moe's truck weeks before. [REDACTED] stated Moe "beat the shit out of her" for hours. She advised he would not let her go until the next morning after he knew Billy and her sister Ashley were dead. [REDACTED] stated she thought that instead of killing her, Moe killed her sister. She stated that once Moe told her Ashley had been shot, she asked him how he knew. He stated to her that he had people who told him.

Det. Waterworth interviewed [REDACTED] (known as [REDACTED]) about his involvement and interaction with the Defendant. [REDACTED] advised the Defendant had told him that he killed Billy and Ashley and stated that he didn't know Ashley was in the car. [REDACTED] stated the Defendant told everyone but Jennifer that he'd shot Billy but was trying to convince J [REDACTED] that Moe must have done it. [REDACTED] also stated that the Defendant always carries that Glock 10mm on his, and that just prior to the arrest, he ran into the bedroom [REDACTED] was in and threw the Glock out of the window.

On 5/27/2021 Detective Pagel and Lane interviewed the Defendant. Prior to the interview he was read his Miranda rights verbatim. Initially, the Defendant denied any involvement in the shooting death of Billy and Ashley. He was then made aware of the evidence and eventually confessed to shooting both of them. The Defendant stated that on Saturday 5/22/21 he was contacted by Moe that he had taken [REDACTED], and it was told that if he didn't kill [REDACTED], Moe would kill the whole family. He stated the issues with Moe all stemmed from when [REDACTED] stole Moe's truck. The defendant advised that on the morning of 5/23/21 he near 23rd St and Pleasant and an apartment. He stated he received a call from a number and a person he didn't know telling him that Billy was over at Ashley's house (105 N Huttig Ave) and this would be the best time to do it. The Defendant advised he drove over to the house a white Malibu alone. He stated he walked into the house and one of the kids was still awake. He advised he heard voices in the basement and assumed everyone was down there. The Defendant stated he looked outside and noticed Billy's jeep was running and observed Billy inside the car. He advised he stepped outside and shot until the gun was empty. When asked how many bullets were in the gun, he stated it held 17 and he fired them all. He advised he only noticed one head in the car and did not know Ashley was inside the vehicle. The defendant stated after the shooting he left and returned to Motel 6 off 210 Hwy. He advised he didn't know Ashley was in the car and dead until his friend Tank told him.

Additionally, after the Glock 10mm firearm was recovered at 3560 Broadway Blvd in the yard where it was thrown out the window, it was test fired at IPD. The casing from the test fire was entered into NIBIN and revealed a match to the shell casings recovered from the homicide at 105 N. Huttig Ave.

Detective Jeff Pagel

/s/ Jeff Pagel

Print Name

Signature