

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

POLICE NO. :	KC21057012
PROSECUTOR NO. :	095466000
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DARRYL DONEGAN)	
7805 E 112th St.)	CASE NO. 2116-CR
Kansas City, MO 64134)	DIVISION
DOB: 06/04/1992)	
Race/Sex: B/M)	
)	
)	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 August 27, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Kurreem D Graves caused the death of Kurreem D Graves 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 August 27, 2021, in the County of Jackson, State of

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Missouri, the defendant committed the felony of murder in the second degree charged in Count One, 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 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/ Jeannette Wolpink
Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor

State vs. Darryl Donegan

Kansas City, MO 64106
(816) 881-1776
jwolpink@jacksongov.org

WITNESSES:

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106
3. Kurreem D Graves, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. [REDACTED] 12th St, Floor 11, Kansas City, MO 64106
5. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
6. [REDACTED], Floor 11, Kansas City, MO 64106
7. [REDACTED] 11, Kansas City, MO 64106
8. DET James H. Price, 1125 Locust, Kansas City, MO 64106
9. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
10. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
11. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
12. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08/27/2021

CRN: 21057012

I, Detective Ilinca Rusnac #5741, of the Kansas City, Missouri Police Department
(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 08/27/2021, at 7903 E 112th St in
(Date) (Address)

Kansas City, Jackson Missouri Darryl A.D. Donegan
(County) (Name of Offender(s))

R:B S:M DOB: 06/04/1992 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08/27/2021 at 0217 hours, Officers of the Kansas City, Missouri Police Department were dispatched to **7903 E 112th St, Kansas City, Jackson County MO**, regarding a sound of shots call which was updated en route to a shooting. Upon arrival they located the shooting victim slumped over onto the driver side of a vehicle and suffering from multiple gunshot wounds. The victim was unresponsive upon officers' arrival and was pronounced deceased on scene by the responding KCFD Medic. The Jackson County Medical Examiner's Office determined the manner of death as homicide.

Witness [REDACTED] stated that he had been at the dispatched address for several hours of 08/26/21 into 08/27/21. He stated that he produces beats for rap songs and the homeowner writes lyrics, which is why he is often there. [REDACTED] stated that he knew the Victim from always being over at the house and he got him a job at a [REDACTED] stated he also knew the suspect because he would frequent the same residence often and lived only a few houses down but only knew him by his nickname of "Ready" later identified as **Darryl A.D. Donegan**. [REDACTED] described the victim and the suspect as being friends but added that on the morning of the shooting, the two had been involved in an ongoing verbal altercation. Sometime around 0200 hours, [REDACTED] left the residence in his vehicle to drive to a nearby store. When he returned, he parked his vehicle in front of 7903 E 112th facing east and right in front of the victim's parked vehicle, which was facing west [REDACTED] was sitting inside of his vehicle looking for beats on his phone. He observed the victim leave in his white Chevrolet Suburban and return a short while later and park right in front of the dispatched address, facing his vehicle. As [REDACTED] was looking down on his phone, he heard several gunshots. When he looked up, he saw the suspect shooting in the direction of the victim and his white Suburban. He then witnessed the suspect stop shooting and begin to walk westbound and towards him. The suspect then turned back around and fired more rounds in the direction of the victim. The suspect turned around a second time and began walking westbound on E 112th St towards the direction of his residence. [REDACTED] observed the suspect looking at him so he exited his vehicle and ran across the street for cover. Once the suspect had walked out of line of sight [REDACTED] went back to the victim's car,

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looked inside but couldn't find him and began yelling out for him. That is when the victim responded and said that he was under the vehicle and began crawling out from under it. [REDACTED] then ran back to his car and called 911.

Witness [REDACTED] stated that she had been living with her cousin at the dispatched address and was there during the incident. [REDACTED] stated that the night of the incident, (08/26/21 into 08/27/21), she was at the residence along with her adult cousin, [REDACTED], **Donegan** (who she knew as Ready) and the victim. [REDACTED] stated that **Donegan** appeared aggressive throughout the night telling the victim to step outside so they could fight multiple times. At some point in the night, **Donegan** pulled out a black handgun with an extended magazine and began gesturing with it in his hand but did not point it at anyone. This made her nervous, so she convinced **Donegan** to step outside of the residence because she wanted him away from her children due to his behavior and weapon handling [REDACTED] asked **Donegan** to put the gun away but as he attempted to tuck it in his pants, the gun kept falling to the ground. [REDACTED] then tried to convince **Donegan** to let her hold on to the gun so she could put it away, but he refused.

[REDACTED] went back into the residence to check on her children and came back out to hear **Donegan** shouting at the victim something to the effect of "Say one more thing [to me]" in a threatening manner. The victim continued the verbal altercation and that is when [REDACTED] witnessed **Donegan** raise his handgun and fire it at the victim. She also stated that her cousin, Ashley, who had left the residence previously was just driving back so [REDACTED] began running after her car in fear due to **Donegan** still firing shots. [REDACTED] and her cousin returned to their residence a short time later and observed the victim on the ground in between his vehicle and the front of their yard. She could also hear **Donegan** walking away in the direction of his residence, apparently talking to himself. When asked, [REDACTED] stated that to her knowledge, nobody else was armed that evening aside from **Donegan**.

[REDACTED] also told officers on scene that that the suspect "lived just up the street on this side, with a maroon door and a silver car in the driveway." It was verified by [REDACTED] that the residence she was referring to was 7805 E 112th St.

Witness [REDACTED] stated that she was the homeowner of the dispatched address where she had been living with her children and adult cousin, [REDACTED]. Witness [REDACTED] stated that the victim and suspect had been at her address since the evening hours of 08/26/2021 and into 08/27/2021. She stated that at some point earlier in the night, **Donegan** told her that the victim wanted him (**Donegan**) to kill her. [REDACTED] did not believe **Donegan** and told the victim about what the suspect had told her. The victim began calling **Donegan** a liar and that is what started the ongoing verbal altercation. [REDACTED] stated that she left her residence briefly to go to the store. When she returned, she began hearing gunshots but did not know where they were coming from so, she ducked and started backing her vehicle away from her house. That is when [REDACTED] came running up and jumped in the car with her. They returned once they couldn't hear any more gunshots and found the victim on the ground by his vehicle.

Witness [REDACTED] stated that she went over to the dispatched address with the intention of confronting the homeowner about possibly being involved in a relationship with her boyfriend, [REDACTED] [REDACTED] argued for a while before [REDACTED] and his male cousin pulled up in separate cars. [REDACTED] further stated that [REDACTED], her cousin, [REDACTED] and a heavyset black male with dreads that everyone called "Ready" all went inside the house (7903 E 112th St.)

After [REDACTED] and [REDACTED] argued for a while, the victim showed up to the house with a blonde female that [REDACTED] did not know. "Ready" started acting crazy towards the victim and the two started "shadow boxing" outside in

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front of the house. ■ saw "Ready" with a black handgun with a longer magazine and he had dropped it a couple times during the altercation. The victim kept telling "Ready" to stop coming at him because his arm was messed up and did not want to fight. The two stopped squaring off with each other and things calmed down a bit, so everyone went back inside and a few minutes later "Ready" and the victim began arguing again at which time ■ told them to take it outside ■ ■ got into a heated argument so ■ left and went back to her house. She then returned a while later to confront ■. again. When she returned, everyone had left.

She saw the victim's vehicle (white Chevy Suburban) parked on the side of the street with the driver's side door open and someone underneath the vehicle. She approached the Suburban and saw shoes sticking out from underneath the vehicle and a shell casing near them. She saw blood on the ground near the vehicle and walked around to the driver's side. That is when she saw the victim pulling himself out from underneath the Suburban. ■ told him she was calling the paramedics and he started moaning. The victim sat up, leaned forward, and stopped moving. A short time later police arrived.

Witnesses ■ and ■ were shown line-ups. All three witnesses positively identified **Donegan** as the person they referred to as "Ready."

Officers responded to 7805 E 112th St at approximately 0320 hours and contacted the homeowner and resident who confirmed that **Donegan** was inside the residence. He exited the residence and was taken into custody without incident.

Donegan was escorted to Police Headquarters 7th Floor, Interview room #4. **Donegan** was read the Miranda Warning verbatim and agreed to provide a statement without an attorney present. **Donegan** initially denied being at dispatched address but eventually admitted to having been there starting before sundown on 08/26/2021 and into 08/27/2021. **Donegan** stated that he frequented ■'s residence often because he loved her and wanted to keep her safe. He stated that he had known the victim for approximately one year. **Donegan** said that on the late evening early morning of the incident he, ■ and the victim were together at the dispatched address. **Donegan** stated that he was buzzed from alcohol but was not incapacitated and was fully aware of what was happening. He stated that he felt numerous people were after him and wanted to kill him and the victim was one of those people. **Donegan** referred to the victim having pointed a handgun at him but when asked for details, he offered that he had "seen him with the eyes on the back of his head" and that he hadn't seen him holding a gun per se but rather felt like the victim's behavior towards him was life threatening. When asked how many times he shot the victim, **Donegan** could not provide an exact number but stated that it was more than twice and less than ten. He also added that after he shot the victim "a lot" he tried to shoot him more, but his gun wouldn't work, and he couldn't find him. I asked **Donegan** if he believed that his gun stopped firing because it was out of bullets and he said no, it stopped firing because it had jammed. I then asked what he did with the gun. **Donegan** answered that he went back to his residence, randomly threw the handgun in his back yard, and then went inside his parents' residence, where he was later arrested. **Donegan** described the handgun he used as a Smith and Wesson handgun with an extended magazine.

Donegan's mother and homeowner gave Consent to Search of her residence and a search warrant was obtained for **Donegan's** dwelling, which was an unattached shed in the rear of the back yard and curtilage.

An open 50 count box of Federal .40 S&W ammunition with 12 rounds remaining inside was recovered from inside **Donegan's** shed. A total of six shell casings with the same head stamp were recovered from within the crime scene, next to the victim's body.

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ATF Agent Koerner responded with K9 Shiloh and aided in the search of the shed and back yard. K9 Shiloh located a black Smith and Wesson handgun with an extended magazine which was located under yard vegetation, in the southwest corner of the back yard.

Printed Name Detective Ilinca Rusnac #5741 Signature /s/ Detective Rusnac #5741

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

Judge

Circuit Court of _____ County, State of Missouri.