IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT INDEPENDENCE</u>

P	OLICE NO.:	22-0003	64
PROSEC	CUTOR NO.:	0954679	956
	OCN:		
STATE OF MISSOURI,)
,	PLAIN	TIFF,)
vs.		Ş)
)
MARQUISE L WEBB)
5917 Blue Hills Rd			CASE NO. 2216-CR
Kansas City, MO 64110		`	DIVISION
DOB: 04/17/2000		Ś)
Race/Sex: B/M		Ş	
)
	DEFENI	DANT.)
	COMP	ΓΑΙΝΊ	r

<u>COMPLAINT</u> 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 January 14, 2022, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Richie T. Aaron caused the death of Richie T. Aaron 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 January 14, 2022, in the County of Jackson, State of 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

State vs. Marquise L Webb

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 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 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.

Count III. Vehicle Hijacking - Serious Physical Injury/Deadly Weapon/Dangerous Instrument/Vulnerable Person (570.027-001Y20201212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.027, RSMo, committed the class A felony of Vehicle Hijacking, punishable upon conviction under Section 558.011, RSMo, in that on or about January 14, 2022, in the County of Jackson, State of Missouri, the defendant forcibly seize possession or control of a 2015 Dodge Charger which was in the immediate possession of James Richardson, and in the course thereof displayed what appeared to be a deadly weapon.

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 January 14, 2022, in the County of Jackson, State of

State vs. Marquise L Webb

Missouri, the defendant committed the felony of vehicle hijacking charged in Count three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of vehicle hijacking by, with and through, the knowing use, assistance and aid of a 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 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.

Count V. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class E felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 31, 2022, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons black handgun, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range punishment for a class E 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

State vs. Marquise L Webb

exceed four (4) 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/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
321 West Lexington Avenue
Independence, MO 64050
(816) 881-4592
jbaldwin@jacksongov.org

WITNESSES:

- 1. DET Chad Albin, 10 NE Tudor, Lee's Summit, MO 64086
- 2. DET Erika Albin, 10 NE Tudor, Lees Summit, MO 64086
- 3. PO Sam Cole, 10 NE Tudor, Lee's Summit, MO 64086
- 4. DET Kevin Dibben, 10 NE Tudor, Lee's Summit, MO 64086
- 5. DET Scott Doumitt, 10 NE Tudor, Lee's Summit, MO 64086
- 6. DET Aaron Ide, 10 NE Tudor, Lee's Summit, MO 64086
- 7. SGT Scott Liles, 10 NE Tudor, Lees Summit, MO 64086
- 8. PO Stephen Owings, 10 NE Tudor, Lee's Summit, MO 64086
- 9. St, Floor 11, Kansas City, MO 64106

Counts 1, 2, 3, and 4 STATEMENT OF PROBABLE CAUSE

LSPD Complaint: LSPD22-00364

Date: 02/01/2022

I, Detective Aaron Ide, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

- 1. I have probable cause to believe that on 01/14/2022, at 220 SW Main St, Lee's Summit, Missouri, Marquise L. Webb (B/M, 04/17/2000, committed one or more criminal offenses.
- The facts supporting this belief are as follows:

On 01-14-2022 at about 2145 hours, Det. Sgt. Liles (LSPD) was notified by Sgt. Cole (LSPD) of two incidents that seemed to be related. He said patrol officers were dispatched to an armed carjacking that occurred behind Konrad's at 302 SW Main St. While officers were investigating the carjacking, an additional call for service was dispatched that involved someone being shot on the Amtrak with the suspect exiting the train at 3rd and Main. The Amtrak continued to a stop in Independence, MO where the shooting victim was pronounced dead. The victim was identified as Richie Aaron

Detectives conducted field interviews with the witnesses that were on the train. Multiple witnesses stated that they heard several gunshots. They described the shooter as being a black male in his 20's, and that he was wearing dark pants and a jacket or hoodie that was black and yellow. The black male was also described as being a skinny build, under 6'0 tall, with curly hair. No one observed or heard a disturbance leading up to the shooting.

I responded to the train car to observe the crime scene. I observed a brown wallet, cell phone (816-655-1724), ear buds charger, and power cord on the floor, and a dark blue duffel bag, all later determined to belong to Aaron. There was a gray jacket, later determined to match the jacket the suspect was wearing. There was what appeared to be a bullet hole on the back, left side, of seat 38.

Det. Reese conducted an interview with the victim, stated while he was waiting in his vehicle, a 2015 Dodge Charger, his driver's door just opened at which point he thought it was his girlfriend. He then observed it to be an unknown black male who pointed a handgun at his head while telling him to get out of the car now. The unknown male then entered his vehicle and drove away. The suspect was described as a black male with dreads. He had a thin goatee and a deep scratchy voice. His eyes were puffy and red, he looked high. He was wearing a black beanie style hat, longer black coat with red on it, black pants and black boots. He was carrying a medium size black back-pack. The handgun was a black semi-automatic style handgun.

Det. Sgt. Liles contacted Capt. Ali Sulemani (Amtrak Police) at which time Capt. Sulemani told Det. Sgt. Liles the conductor stated productor, B/M, 10-13-1999, was missing from the train. On 01-15-2022 Det. Sgt. S. Doumitt and Det. C. Albin interviewed

stated he boarded the Amtrak train in St. Louis, Missouri, and planned on ending his trip in Lee's Summit, Missouri.

When the train stopped at the Amtrak Station in Lee's Summit, he heard three apparent gunshots. After the male shot the victim he stated, "That's what you get." The male was carrying a black colored backpack when he left the train. He described the male as a dark complexed black male, approximately eighteen to twenty years old. The male was wearing a black and yellow colored jacket and dark pants. It described the male's hair as "sponged" and stated that he had "big full lips." It described the handgun as black colored handgun with an orange colored "tip" on the end of the barrel like you would see on a toy gun.

Detective Nick Binner, Amtrak Police Department, was contacted by
of the train. advised that while was checking tickets on the train, before the shooting
occurred, and contacted the passenger identifying to be Marquise Webb to check his ticket. At
that time, observed that Webb had purchased two tickets for the same trip.
Webb about having two tickets at which time Webb shrugged it off like it was no big deal.
stated that in Independence they were transferring passengers that were supposed to
be going on to the Kansas City stop, from the train to a bus. The bus was going to take the
passengers to the Kansas City stop. As they were transferring passengers, they were making a
list of the passengers as they got on the bus. They then compared that list to the manifest and
observed four passengers that were not on the bus that should have been continuing on to
Kansas City. The four passengers were , Marquise Webb,
and . They determined that and were females.
had been accounted for by Det. C. Albin. Marquise Webb was then unaccounted for and
according to the manifest, was supposed to be traveling to the Kansas City stop.
A check of Webb's tickets showed that he boarded the Amtrak in Normal, IL, which is the

A check of Webb's tickets showed that he boarded the Amtrak in Normal, IL, which is the same location the deceased, Aaron, boarded the Amtrak. Det. M. Badalamenti, Normal Police Department, recovered video surveillance from the Normal Amtrak station. While reviewing the video surveillance Det. Badalamenti observed Aaron and the passenger identifying as Webb as they entered the station at separate times. Aaron appeared to be wearing the same clothing that he was in while on the train. Webb appeared to be wearing the gray jacket that was later recovered from the train car scene, which is the same jacket (size is youth's XL) the conductor stated that no one claimed after the shooting and was located on the luggage rack for the row of seats behind Aaron's row. Webb's DOR entry shows him to be 5'3 and 130 lbs. Webb had a black hoodie over his head. He was wearing a backpack and black pants. Webb was carrying what appeared to be a shirt or jacket that was yellow and black in color. While reviewing the video surveillance, Webb is observed using a cell phone that he was keeping with him multiple times.

On 01-18-2022 Det. P. Stewart conducted a check via Whooster of the phone number 816-621-9544 which is suspected to belong to Webb due to being the phone number listed on both of Webb's Amtrak tickets. The second identity to show was Webb's.

On 01-20-2022 a court order was issued for a Pen/Trap of the phone number believed to be used by Webb.

On 01-21-2022 search warrants were issued for two email addresses associated to Aaron and two emails associated to Webb.

On 01-21-2022 Detectives began receiving pen/trap information from Verizon Wireless on Webb's phone. According to cell phone tower locations 01-14-2021 Webb's phone was in Burlington Illinois on 01-14-2022. His phone traveled from Burlington Illinois to St. Louis Missouri, which is consistent with cell phone towers along the train tracks between the two cities. From Saint Louis Missouri Webb's phone traveled to Lee's Summit still remaining consistent with cell phone towers along the train route. At Lee's Summit, Webb's phone shows a clear deviation from the train track cell phone tower locations. Cell phone tower locations show his phone heading due west into Kansas City and would not be consistent with cell phone tower locations if his phone had remained on the train heading towards Independence, Missouri.

On 01-21-2021 Detectives also began physical surveillance on the GPS locations associated to Webb's phone. The GPS locations were placing the phone in the area of the 5900 block of Blue Hills Road Kansas City Missouri. Electronic Surveillance placed the phone specifically in the apartment building 1600 of the Citadel Apartments.

Marquise Webb's shows an association through Clear to the Citadel Apartment building 1604 Apartment 149. Running name through REJIS locator services also shows an association to also works at the Citadel apartments leasing office. Furthermore, detectives ran an Accurint report, which listed most recent address at 1604 Apartment 149.

On 01/31/22, Detectives executed a search warrant at 1604 Bushman Dr #149 KCMO 64110 in an attempt to locate the cell phone used by Suspect Webb for the Amtrak ticket. Contact was made through the front door with a female on the inside. We identified ourselves verbally as the police department and she said to hold on while she got dressed. She never opened the door so we could identify her. A short time later, a male emerged from the back door of the residence as the female stood next to him. The male was positively identified as Marquise Webb by Det. Treacy, as he produced a black handgun. Marquise Webb ran back inside and did not answer to any verbal commands. The female was escorted out of the scene by detectives.

A short time later, the front door of the apartment opened slightly and we gave verbal commands for the person inside to show their hands. The barrel of a black handgun was pointed out of the slighly open door and then was pointed directly at Det. Owings and a KCPD detective. The subject immediately closed the front door and did not follow any verbal commands from detectives on scene.

Det. Ide made contact with	t which time she explained that she did purchase an
Amtrak ticket for Marquise to travel from N	Normal, IL to Kansas City.
Marquise went to Normal to visit some far	mily members. stated that she took Marquise
to the Amtrak station to go to Normal, but	she did not know how Marquise arrived at her
residence. stated that no one ro	ode with Marquise to Normal and she did not know if
anyone came back with him.	as shown still photos from the St. Louis Amtrak video
surveillance where she positively identifie	d Marquise.
Detectives executed a search warrant	of the Marquise's residence at which time a social
security card belonging to	was located in the bowl of the apartment toilet. A
gray backpack, matching the one Webb w	vas wearing in the video surveillance, was located in the
closet of the master bedroom. Inside the	backpack was a 9mm magazine, a Venmo MasterCard
belonging to and an id	dentification card for Marquise Webb. A Taurus 9mm
handgun was located on the floor of the m	naster bedroom.

<u>Detective Aaron Ide</u> **Print Name (Detective)** /s/ Det. Aaron Ide
Signature (Detective)

Count 5 PROBABLE CAUSE STATEMENT FORM

PROBAB	LE CAUSE STATEN	TENT FORM	
Date: 01-31-2022		CRN: 22-6614	
I, Detective Kelsie McLees 5734, Kar	nsas City, Missouri Po	lice Department	
(Name and identify law enforcement office			
1 : 4 . 61		1	,
knowing that false statements on this fo	orm are punishable by	law, state that the facts contained herein are	true.
I have probable cause to believe that or		, at1604 Bushman Rd #149	in
	(Date)	(Address)	
Kansas City, <u>Jackson</u>	MissouriWEBB,l	MARQUISE	
(County)		(Name of Offender(s))	
B/M 04-17-2000		committed one or more criminal offense	e(s).
(Description of Identi	ity)	_	
The facts supporting this belief are as for	ollows:		
11 8			
· · · · · · · · · · · · · · · · · · ·		ty, Missouri Police Department were dispato	
-	_	l Paseo Blvd in regard to an aggravated assa	
		wo victims to be a detective for Lees Summi	it
Police Department and a detective of the	•	-	
working in an on duty capacity at the time	e of the aggravated ass	ault.	
		orking in an on duty capacity today, 01-31-2	
for the Kansas City, Missouri Police Department		vas wearing an outer vest with police marking	_
		e Department in locating WEBB,MARQU	
in regard to a homicide investigation. Price			
that everyone had vest and police marking		ery detective working this investigation was	
wearing an outer vest with police marking		. (Lees Summit PD) and a KCPD	
		nt to the rear. Detectives knocked on the fro	
		responded identifying themselves as police.	
female stated she would open the door in		near commotion in the rear of the apartment	
		nouncing themselves as police and giving v	
		the building so that there was a KCPD pres	
in the front. Detectives in the rear of the b			was
in the hallway of the building when he ob			
holding a black semi-automatic handgun	out of the cracked door	rway. began giving verbal commands	to

Detective . (victim) stated the following: He responded to 1604 Bushman Rd apartment 149 to conduct a knock and talk in regard to a homicide that occurred in Lees Summit. There was a person of interest

WEBB, but WEBB did not comply. WEBB raised the handgun and pointed it at before quickly shutting

the door. . . and the detectives in the front retreated to a safer location.

PROBABLE CAUSE STATEMENT FORM

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-CRN	22-6614	

for WEBB,MARQUISE for homicide. Detectives were tracking a phone to that apartment. Detectives knocked on the front door. A female asked who was there, and detectives identified themselves as police. The female advised she would get dressed and open the door. He heard yelling and commotion on the rear of the apartment where four more detectives were located.  Could hear a lot of verbal commands, telling  WEBB,MARQUISE to show them his hands. Two of the detectives in the front went to the rear. Two Lees  Summit detectives stayed with  Detective  was also in the front with  and  were in the breezeway of the apartment building. When they heard something about a gun from the detectives on the rear of the apartment.  grabbed one of the detectives to begin retreating. As they were attempting to retreat, observed the apartment door open slightly and he observed a barrel of a gun pointed at him and the others.  described the gun as a black handgun.  advised he could not see who was holding the gun, due to it being dark and his positioning. As soon as  observed the gun, he began giving verbal commands to warn the other officers that he observed a gun, and for the person inside the apartment to drop the gun. The door shut quickly and the detectives retreated back to a safe location.				
. (witness) stated the following: <b>WEBB,MARQUISE</b> is her brother. He has been staying with her for a few months now. She was inside her apartment (1604 Bushman Rd apartment 149) on the phone with school when she could hear officers talking. When she looked out the window, she heard officers saying "what if she says he's not in there). Officers were now on the front and back side of her apartment. Her brother, <b>WEBB,MARQUISE</b> , was trying to exit the back door of the apartment, but there were officers there. assumes that <b>WEBB,MARQUISE</b> pointed a gun because officers were pointing guns toward him and telling him to drop the gun. knows <b>WEBB,MARQUISE</b> to carry a handgun with him at all times.				
On 01-31-2022 at 2005 hours, <b>WEBB,MARQUISE B/M 04-17-2000</b> exited the apartment and was taken into custody without incident, ending the operation 100. A search warrant was obtained for 1604 Bushman Rd Apartment 149. During the search warrant execution, detectives located a Taurus G2C 9mm handgun bearing serial number ACH144475 on the master bedroom floor by a dresser. The magazine in the Taurus had live rounds of ammunition, with one live round of ammunition in the chamber of the firearm.				
Due to the aforementioned information, and previous criminal history, it is believed that WEBB is a danger to society.				
Printed Name Detective Kelsie McLees 5734 Signature /s/Detective K. McLees 5734				
The Court finds probable cause and directs the issuance of a warrant this day of				
Judge				
Circuit Court of County, State of Missouri.				