

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

<b>POLICE NO. :</b>	KC22005301
<b>PROSECUTOR NO. :</b>	095468030
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MAKAYLA R SMITH</b>	)	
<b>8211 East 85th Street</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64133</b>	)	<b>DIVISION</b>
<b>DOB: 03/24/1992</b>	)	
<b>Race/Sex: B/F</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200901.0)**

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 25, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Jenna Nava caused the death of Jenna Nava by shooting her.

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 January 25, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant

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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.

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/ Brady X. Twenter*  
Brady X. Twenter (#49380)  
Assistant Prosecuting Attorney  
415 E. 12th St., 10<sup>th</sup> Floor  
Kansas City, MO 64106  
BTwenter@jacksongov.org

**WITNESSES:**

1. 
3. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 03-16-2022

CRN: KC22-005301

I, Detective Jeremy D. Wells #5015 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 01-25-2022, at 8810 Crystal Lane #303 in  
(Date) (Address)

Kansas City, Jackson Missouri Makayla R. Smith  
(County) (Name of Offender(s))

B/F, 03-24-1992 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 01-25-2022 at approximately 2154 hours, Officers were dispatched to 8810 Crystal Lane #303 Kansas City, Jackson County, MO on a reported shooting. Upon arrival officers were directed to the third floor apartment #303, where they located a female victim suffering from apparent trauma. Officers located a faint pulse upon arrival; however KCFD EMS arrived and declared the victim deceased on scene. Three juvenile children (victim’s kids) were located within the apartment as well. Detectives located one live 9MM round north of the victim and a large black handle kitchen knife was located in the south dining room of the apartment. Detectives were advised officers moved the knife from next to the victim’s right hand and rolled her from a face down position to a supine position. 1020 Homicide Squad responded to investigate and Jackson County Medical Examiner’s Office has ruled the death a homicide.

It was determined several reports had been documented in regard to Domestic Violence Issues between the victim and her wife and a current Ex-Parte Order of Protection showed to expire on 01-25-2022. A Full Order of Protection had been issued by the Jackson County Courts; however had not been served with the suspect listed as the Petitioner and the victim the Respondent.

While processing the victim for evidence at the Jackson County Medical Examiner’s Office, detectives were advised the victim’s gunshot wound had indications the firearm was against the body (contact wound), a square muzzle imprint was observed, and some soot was observed in the wound; however advised the victim’s clothing may have been between the firearm and her skin.

A [REDACTED] who was in the residence, advised she was in the front room of the apartment when she heard someone messing with entry door of the residence from the outside observing the doorknob “jiggle”. She advised she attempted to see who it was through the peep hole, but it was being covered. She stated she went to wake up her mother in the back bedroom and told her someone was at the door. While her mother was getting dressed, she went and grabbed a knife out of the kitchen. When her mother asked “who is it” through the door, [REDACTED] heard the voice she knows to be her mother’s wife say “me.” The wife was identified as **Makayla R. Smith B/F, 03-24-1992**. After she heard **Smith** say me, she

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handed her mother the kitchen knife. When the victim opened the door, **Smith** entered the apartment, but the victim quickly shut the door because another female was with her. **Smith** then unlocked the door, let the second female suspect in, and a verbal argument ensued. The victim held the knife so the second female suspect and **Smith** could see it. The second female suspect stated "I'm not scared of no knife" and chest bumped the victim. That's when the victim told the juvenile to go get her phone to call for police. When the witness got back with the phone, she observed **Smith** pull a handgun from her hoodie pocket and she held it against the victim's neck. The witness then got her two sisters and hid in the bedroom before hearing a single gunshot. She stated she called 911 and did not exit the room until police arrived. She knows **Smith** carries firearms and she saw the butt of a firearm when she entered the apartment. She advised a previous incident occurred where **Smith** attempted to shoot the victim in the foot in the master bedroom. She stated the fired round missed the victim going through the closet. During processing detectives and Crime Scene Technicians located physical evidence consistent with this event and a single spent bullet was located on the floor of the utility closet.

A second younger juvenile witness (10 years of age) advised when **Smith** entered the apartment with the second female suspect and the argument between **Smith** and her mother began, she described seeing **Smith** with a firearm in her hand. She advised she didn't see any other actions in regard due to her older sister taking her to the back room of the residence with their younger sister prior to the shooting. Both the juvenile's audio and video interviewed at Child Protective Service Office's in regard to this investigation.

A witness, **Smith's** friend of five years, called KCPD and stated **Smith** told him what happened. At approximately 1630 hours, the witness responded to 1125 Locust Street, Kansas City, Jackson County, Missouri to provide a statement. The witness stated **Smith** called him this morning and asked him to come to her grandparents house, [REDACTED] Raytown, Jackson County, Missouri because she needed to talk to him. He did so and **Smith** admitted to him that she accidentally shot the victim when she came at her with a knife. The witness advised **Smith** she needed to turn herself in. While detectives were interviewing the witness, **Smith** called the witness and spoke with him; however the witness had an ear piece in only allowing detective's to hear one side of the conversation. Although detectives could not hear **Smith's** side of the conversation, based on the witness's response about not committing suicide it is believed **Smith** was talking about committing suicide. He advised he was not at the scene of the homicide and had no direct knowledge in regard to what occurred, only what **Smith** told him. He advised the victim and **Smith** had a strained relationship and stated he had advised her this shooting wasn't an accident because she chose to go over to the residence in his opinion.

During the above interview with the aforementioned witness with detectives, Kansas City, Missouri Police Officer's were conducting surveillance at [REDACTED], Raytown, Jackson County, Missouri 64138. TIPS had been received **Smith** was at this residence ([REDACTED] residence) and her Dodge Challenger was at the residence. This residence later is determined to be the billing address for two separate cellular number accounts associated to **Smith**. Officer's observed **Smith** leave the residence and get into the driver's seat of a gray in color 2019 Dodge Challenger with a Missouri temporary tag of 05TXAF (VIN:2C3CDZKGXKH618848, which is registered to **Smith** through Missouri Department of Revenue with the above address listed. After **Smith** got into the vehicle, the identified second female suspect exited the residence and stood near the car and had a verbal exchange with **Smith**. The second female suspect went to her vehicle, returned back to **Smith's** vehicle, and then went back into the residence. Officer's observed **Smith** leave in the Dodge Challenger and followed her to the area of E. 87<sup>th</sup> Street and Blue Ridge Boulevard. **Smith** then returned to the residence and pulled into the driveway. A felony car check was initiated by KCPD TRT officers and **Smith**, the sole occupant of the vehicle, was taken into custody. As **Smith** was being taken into custody, the second

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female suspect exited the residence and was taken into custody. As TRT officer's visually cleared the vehicle for other occupants, a spent shell casing was observed in the driver's side front floor board, in plain view. **Smith's** cellular device was also observed in the front seat of the vehicle.

While processing the original scene a single live round bearing the headstamp FC 9MM Luger was located near the north side of the living room; however no spent shell casing was located. Detectives located several stacks of mail throughout the Master Bedroom and only observed the victim's name associated to the mail and forms inside the residence. Two single items were located in the residence associated to **Smith**, the marriage license for the victim and **Smith** and a MY Choice card near the television in the room.

The second female suspect was transported to 1125 Locust and was placed on a 24 hour investigative hold. She was read aloud her Miranda Rights and advised she understood them. She stated she was with **Smith** the previous evening and they both arrived in separate vehicles at the apartment complex. She stated **Smith** went to the victim's apartment complex and waited to meet with the police to serve a Full Protection Order to victim. She stated **Smith** stopped answering her phone and she was worried about her, so she drove over to the complex to check on her. She stated **Smith** told her the victim texted her and told her she loved her and she missed her. She stated **Smith** wanted to go talk to the victim, so she went with **Smith** to the victim's apartment. She stated the victim opened the door to the apartment and let **Smith** enter before revealing a knife she was holding behind her back. She stated the victim then slammed the door while she was still standing in the hallway. She stated she then kicked the door two times before **Smith** opened the door. She stated she then entered the apartment and observed **Smith** and the victim "tussling" over the knife. She stated she then stepped in between them to break it up, and the victim pushed her back with her left hand because the knife was in her right hand. She stated **Smith** and the victim continued to tussle over the knife before the victim held the knife to **Smith's** neck. She stated **Smith** then pulled her gun out of her pocket with her right hand, but she could not tell where the gun was pointed from where she was standing. She stated the victim then hit **Smith's** arm, causing **Smith** to accidentally pull the trigger, causing the firearm to go off. She stated this scared her, so she ran out of the apartment. She stated she assumed the bullet hit the wall, because she did not hear the victim make any sound to indicate that she had been shot. She stated a few seconds after she ran out of the apartment, **Smith** ran out of the apartment, as well. She stated they got into their separate vehicles and left the area in separate directions. She stated she picked up her children before driving to her sister's house, where **Smith** met her a few hours later. She stated she never called police in regard to the incident after she and **Smith** left. She gave consent and provided a sample of her DNA for comparison; however refused to give consent to download her cellular device. She ultimately requested an attorney and was transported to a side station for completion of booking in regard.

**Smith** was arrested and transported to 1125 Locust and was placed on a 24 hour investigative hold. She was read aloud her Miranda Rights and advised she understood them and requested an attorney. She was transported to a side station for completion of her booking in regard. **Smith** was released Per Further Investigation at the request of the Jackson County Prosecutor's Office to gather additional cellular communication data in regard to the relationship.

Requests were submitted in regard to the cellular numbers of the victim and **Smith** in an attempt to determine any previous issues or threats and also in an attempt to determine when **Smith** moved out of the residence and was no longer an occupant. Two separate search warrants were also completed in regard to Text Now account for the victim and **Smith**. The Text Now search warrant in regard to the number associated to **Smith** information was delivered and was found to be registered to the second female at the residence the evening of the homicide. While reviewing messages in regard to 01-21-2022 were located and a conversation

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was located between the #2 Suspect and **Smith**. During the conversation a text is observed received from one of **Smith's** cell number (816-634-7589) with the message "**I got the gun to her head right now**", "**She in my car baby I'm about to shoot her I'm so tired**" as well and a later message from the same number "**I'm finna shoot her**". The victim is never named in the messages observed; however the victim's family and friends have advised the victim met with **Smith** somewhere near Longview Lake on the Saturday before the homicide (01-21-2022) and another message is observed asking **Smith** "**Why did yal leave the lake**"?

A review of 911 calls for service were also completed and there were at least four notations in regard to **Smith** getting her belongings and leaving the apartment. On 10-15-2021 officers were dispatched and served the victim with an ex-parte; however due to no address being specified on the order the victim did not have to leave the location. No specific date could be located in regard to the victim having a right to defend herself within the residence the victim and **Smith** had shared at one time.

Printed Name Detective Jeremy D. Wells Signature /s/ Det. Jeremy D. Wells #5015

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.