


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	23-000104
PROSECUTOR NO. :	095472861
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DAQUNNE E. GREEN)	
1740 West Pennway Terrace)	CASE NO. 2316-CR
Kansas City, MO 64108)	DIVISION
DOB: 06/25/1994)	
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 on or about January 1, 2023, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Christopher Wright, caused the death of Christopher Wright 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.

Defendant is given further notice that should the State submit Murder in the Second Degree - felony under Section 565.021.1(2), it will be based on the death of Christopher Wright as a result of the perpetration of the felony of Unlawful Use of a Weapon resulting in injury or death.

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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 on or about January 1, 2023, 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 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about January 1, 2023, at 9013 East US 40 Highway, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a black 2013 Nissan Altima, and, as a result of the above described conduct, Christopher Wright suffered injury or death.

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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 (571.015-001Y20205213.0)

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 on or about January 1, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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

State vs. Daqunne E. Green

by,

/s/ Jordan L. Logan

Jordan L. Logan (#63975)

Assistant Prosecuting Attorney

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11th Floor

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JLLogan@jacksongov.org

WITNESSES:

1. DET John Roach, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 1/13/2023

Report #: 2023-104

I, John Roach, 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 01-01-23, at 9013 E. US 40 Highway, Independence, Jackson County Missouri 64055, Daqunne E. Green, (Race: Black, Sex: Male, DOB: 06-25-1994, Address: HOMELESS, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 01-01-23 at 1300 hours, Officers with the Independence Missouri Police Department were dispatched to the Short Stop convenience store at 9013 E. US 40 Highway on a reported shots fired call with a victim inside the store who was non-responsive.

Officers arrived on scene and found the Victim, later identified as Chris Wright, inside the business with a gunshot wound on his lower back. Life saving measures were taken but Wright was pronounced deceased by AMR personnel at 1340 hours.

Surveillance footage from the store was viewed by Detective Roach. A black Nissan Altima is observed backing into a parking spot at the west end of the business at 1248 hours. At 1254 hours a silver Ford Focus, driven by Wright, pulls into the lot and parks four spaces to the east of the Altima.

Wright exits his vehicle and is seen talking on his phone. He can be seen in possession of a black Nike backpack which he is wearing over his shoulder. Wright enters the store at 12:54:30 and exits the store at 12:56:50. Wright is observed getting into the driver seat of his vehicle and shutting the door.

At 12:56:57 a black male, later identified as Defendant Green gets out of the front driver's side of the Nissan is observed walking toward Wright's vehicle. Defendant Green is observed wearing a black hooded sweatshirt with a large distinctive design on the front and dark pants. At 12:57:11 Defendant Green enters the front passenger side of Wright's vehicle and shuts the door.

At 12:57:56 the front passenger side window can be seen exploding outward and landing on the ground. A struggle is observed occurring inside the car between Wright and Defendant Green.

At 12:58:09 Defendant Green exits the vehicle holding what appears to be a black handgun.

At 12:58:13 Defendant Green reaches back into the vehicle for something as the vehicle begins to reverse out of the parking space.

Wright is observed driving the vehicle in reverse in an attempt to flee the scene. Defendant Green is observed firing several rounds into Wright's vehicle through the front passenger

window, at the victim. One of the rounds fired strikes Wright and the vehicle decelerates and rolls backward into the Nissan.

At 12:58:22 the driver side door opens, and Wright is seen falling out of the vehicle on the ground. Defendant Green walks around the front of the car and is seen leaning over Wright from 12:58:26 through 12:58:45. During that time frame it appears Defendant Green is removing items from Wright's person, specifically the Nike backpack.

Defendant Green is seen getting back into the Altima and fleeing the scene. At 12:58:59 Wright is observed walking into the store where he is later pronounced deceased.

Processing of the crime scene found four silver .9mm Luger shell casings in the parking lot where Defendant Green was observed firing at Chris Wright. Two more .9mm spent shell casings were located on the passenger side floor board of the Ford Focus.

A large amount of marijuana is located in the Ford Focus along with two spent .9mm shell casings. In the parking lot where Wright fell out of the car more narcotics and cash are located on the ground. As the scene is being processed Detective Roach is advised that a cell phone, confirmed to belong to Wright, is on the front driver side floorboard.

Upon examination of Wright's phone, a subject with the name "AME Qunne" contacted Wright via the Facebook Messenger App. On 01-01-23 five calls occurred between Wright and "AME Qunne" at 1235 hours, 1244 hours, 1245 hours, 1247 hours, and 1254 hours.

A Search Warrant was later obtained and executed for the Facebook Account belonging to "AME Qunne" and found to belong to Defendant Green.

Detective Roach conducted an examination of the Facebook Message thread between Defendant Green and Wright and found most of the thread to be narcotic transactions.

On December 18th, 2022, Defendant Green provides an address to Wright of 1325 Vine Street in Kansas City for Wright to meet for a narcotic transaction.

Detective Roach confirmed the identity of Defendant Green who had been driving the Nissan Altima, which was found parked outside of 1325 Vine Street in Kansas City Missouri. Street Crimes Detectives conducted surveillance on the vehicle and the residence.

On 01-02-23 a search warrant for 1325 Vine Apartment #4 was obtained and executed. The female was identified as [REDACTED], Daqunne Green's sister, and the male was identified as [REDACTED].

On 01-02-23 [REDACTED] contacted Detective Roach and advised Defendant Green had called her cell phone at 1359 hours. When asked she provided Defendant Green's cell phone number as 816 [REDACTED].

On 01-03-23 Detective Freeman, with the Independence Police Department, obtained a Search Warrant for Green's phone number (816-225-5979) which would provide historical data.

Historical data location was reviewed from Defendant Green's cell phone and found to be consistent with the cellular device being in the area of the Short Stop convenience store on the date and time of the shooting.

On 01-10-23 Detectives with the Independence Street Crimes Unit received information from a confidential source of information that Defendant Green was in the area of St. John Avenue and Van Brunt in Kansas City Missouri. Surveillance was conducted in the area and Defendant Green was observed and taken into custody. A search incident to arrest found Defendant Green to be in possession of a black Apple iPhone with the number 816-225-5979.

Defendant Green was transported to the Independence Police Department and escorted to a 3rd Floor Interview room. Prior to the interview he was read and signed the Miranda Warning of Rights form.

During the interview Defendant Green admitted driving to the Short Stop to purchase \$300 of fentanyl from Wright. He stated he got into the passenger side of Wright's vehicle to conduct the transaction. Defendant Green stated while in the vehicle Wright produced a handgun and placed it to his head. He stated he and Wright began to fight for possession of the gun and it went off breaking out the passenger window. Defendant Green advised he was able to take the gun away from Wright.

Defendant Green advised he got out of the vehicle, pointed the gun at Wright and demanded his money back. He stated Wright "spit at him" and began to back the vehicle away from him. Defendant Green admitted to firing the gun an unknown number of times at Wright and the Ford Focus as it was attempting to leave the scene. Defendant Green also acknowledged that at a certain point he was out of the vehicle, with the gun, and able to disengage from the altercation. He stated his anger and his adrenaline caused him to fire rounds at Wright.

On March 7, 2019, Defendant Green was convicted of the class A felony of Robbery in the First Degree in the Circuit Court of Jackson County, Missouri.

Detective John Roach

/S/ John Roach

Print Name

Signature