


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

<b>POLICE NO. :</b>	KC23004025
<b>PROSECUTOR NO. :</b>	095473054
<b>OCN:</b>	HU010706

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>DONALD E CROWE</b>	)	
<b>7310 E 108TH TER</b>	)	<b>CASE NO. 2316-CR</b>
<b>KANSAS CITY, MO 64134</b>	)	<b>DIVISION</b>
<b>DOB: 01/20/1984</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**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 19, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Donald Crowe 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 on or about January 19, 2023, in the County of Jackson,

**State vs. DONALD E CROWE**

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.

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/ Lauren D. Barrett*  
Lauren D. Barrett (#62062)  
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**WITNESSES:**

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. PO Daniel H. Dorr, 1125 Locust, Kansas City, MO 64106
3. CIV Logan Konopasek, 1125 Locust, Kansas City, MO 64106
4. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
5. John Roach, 1125 Locust, Kansas City, MO 64106
6. SGT Eric M Stucker, 1125 Locust, Kansas City, MO 64106
7. PO Dillion D. Viet, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 01-19-2023

CRN: 23-004025

I, Detective Bonita Cannon, #4585, 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 01-19-2023, at 7605 E. 108<sup>th</sup> Terrace in  
(Date) (Address)

Kansas City, Jackson Missouri Donald E. Crowe  
(County) (Name of Offender(s))

DOB: 01-20-1984 / [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 01-19-2023 at 1037 hours, officers of the Kansas City, Missouri Police Department were dispatched to 7605 E. 108th Terrace, Kansas City, Jackson County, Missouri on a reported shooting. The victim was the 911 caller.

During the 911 call for service the victim reported that he was shot 8 times by Donald Crowe, a white male in his 40's, he left on foot in light colored clothing. The victim stated he did not know why he was shot, and that he was going to pass out.

Upon their arrival, the officers located the victim on the front porch of the dispatched address. The victim told officers Donald Crowe shot him 8 times and that he left. The victim was transported via KCFD/EMS to Research Medical Center with life threatening injuries. The victim was pronounced deceased at 1215 hours.

Officers in the area conducted an area canvas locating the suspect, Donald Crowe (W/M 01/20/1984). He was taken into custody in the 7100 block of East 107th Street.

Crowe was transported to Police Headquarters, 1125 Locust. At 1351 hours, Crowe was advised of his Miranda Rights and stated the following: He had gotten off work around 0530 hours, arrived home to found the front door of the residence to be open. He went inside and observed the victim (Douglas Menser) asleep in the chair in the living room. He then went to his bedroom and slept for 3-4 hours. Crowe stated he woke up and people were fighting across the street, however the victim told him there was nothing he could do about it. He stated he and Doug had an argument and then he left, and walked to 7-11.

When asked about the shooting Crowe stated he did not know anything about it, and the victim was fine when he (Crowe) left the address. When confronted with the information that the victim called 911, and stated he was shot, and that, Donald Crowe was the one who shot him; Crowe further stated he did not know why the victim would say that. During his interview, Crowe continued to express how he was upset with the condition of the house, the neighborhood, however never showed any concern regarding the victim. When asked how long he

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had been gone from the house before he was into custody, Crowe stated that he was gone from the address for approximately 15-20 minutes.

While Crowe was being interview, Detectives learned that Crowe did not arrive at the 7-11 until 1127 hours, and the call for service was at 1037 hours. When confronted with time of the reported shooting and the time he was taken into custody, Crowe could not provide an explanation. From the scene of the shooting the 7-11 convenience store, per Google Maps is an estimated eight-minute walk.

During his interview, Crowe continued to deny any knowledge of or any involvement, in the shooting death of the victim.

In light of the recent incident and his recent conduct, the case Detective believes the offender is a danger to himself and the public.

Printed Name /s/Det. Bonita Cannon, #4585 Signature /s/Det. Bonita Cannon, #4585

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

\_\_\_\_\_  
Judge

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