



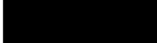
**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	23000873
PROSECUTOR NO. :	095473740
OCN:	qz004210

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
KAINON K SINGLETON)	
13833 BENNINGTON AVE)	CASE NO. 2316-CR
GRANDVIEW, MO 64030)	DIVISION
DOB: 11/21/1997)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y20201310.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed **the class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about March 10, 2023, in the County of Jackson, State of Missouri, the defendant shot at Deputy , and such conduct was a substantial step toward the commission of the offense of assault in the first degree of Deputy , a law enforcement officer in the performance of his official duties and special victim as defined by Section 565.002, and was done for the purpose of committing such assault.

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.

State vs. Kainon K Singleton

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 March 10, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first 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 (571.030-020Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the **class B Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about March 10, 2023, at , in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm from a grey Hyundai Elantra, a motor vehicle.

State vs. Kainon K Singleton

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

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 March 10, 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.

Count V. Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk Of Serious Injury/Death To Any Person (575.150-002Y20204801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about March 10, 2023, in the County of Jackson, State of Missouri, Deputy [REDACTED], a law enforcement officer,

State vs. Kainon K Singleton

was attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officers was making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant nearly struck another vehicle while swerving across lanes of traffic.

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 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/ Daniel Portnoy
Daniel Portnoy (#62186)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Floor
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WITNESSES:

1. DET Jon Bennings, 1200 Main Street, Grandview, MO 64030
2. PO Reece Conner, 1200 Main Street, Grandview, MO 64030
3. PO Kaitlyn B. Elias, 1200 Main Street, Grandview, MO 64030
4. PO Michael Feira, 1200 Main Street, Grandview, MO 64030
5. DET Dexter Goode, 1200 Main Street, Grandview, MO 64030
6. PO Christopher Jennings, 1200 Main, Grandview, MO 64030
7. [REDACTED]
8. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
9. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
10. CPL Joseph Stansfield, 2501 W Mechanic St, Harrisonville, MO 64701

REPORT NUMBER 23000873
GRANDVIEW STATEMENT OF PROBABLE CAUSE

I, Detective Jon Bennings, 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 03/10/2023, at approximately 0341 hours, on northbound at approximately the 14200 block of the East Outer Road, Grandview, Jackson County, Missouri, 64030, Kainon Singleton B/M 11/21/1997, [REDACTED] committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 03/10/2023, at approximately 0341 hours, Grandview officers were notified by the Kansas City, Missouri Police Department that they were conducting surveillance on a silver/gray Hyundai Elantra in the area of Food Lane/Harry Truman Drive - the vehicle was in motion southbound. The vehicle was the subject on an on-going, multi-agency, burglary investigation. A parcel contained within the vehicle was tracking the vehicles movements.

Officer Goode observed the vehicle in the area of the Grand Summit Apartments traveling southbound at a high rate of speed. Officer Goode observed the vehicle to have one headlight out and a missing taillight. Officer Conner, while en route to the area, observed the Hyundai Elantra in the traffic circle at 155th Street and the East Outer Road and attempted to conduct a traffic stop. The vehicle fled westbound on 155th Street and then southbound on I-49. Officer Conner deactivated his emergency lights and siren and discontinued the pursuit. Officer Conner observed the vehicle continue southbound on I-49 and exit on to 58 Highway.

At approximately 0404 hours, Cass County deputies relayed to Grandview officers that they had located the Hyundai Elantra and were in pursuit of the vehicle northbound on I-49. Officer Conner and Officer Goode staged at I-49 Northbound just north of 155th Street in an attempt to deploy stop sticks. As the Hyundai approached the area where Officer Conner and Officer Goode had placed the stop sticks, the vehicle swerved from the number 1 lane, nearly striking a vehicle and toward Officer Conner and Officer Goode and then swerved back into the number 1 lane where the stop sticks were positioned. The vehicle subsequently struck the stop sticks.

Officer Conner returned to his vehicle and began to follow the pursuit as it exited on to the 140th Street roundabout (East outer road). At that time, Officer Jennings advised over the radio that the suspect had fired shots at officers and advised officers to re-engage in the pursuit. Officer Conner re-entered the pursuit as the second car. The vehicle continued to flee from officers northbound on the East Outer Road, eastbound on 140th Street, northbound on Byars Road until the 13300 block when Cass County deputies successfully deployed the Grappler and stopped the pursuit.

(ATTACH ADDITIONAL SHEET(S) IF NEEDED)

As the Hyundai came to a stop, a black male, later identified to be Kainon Singleton (b/m 11/21/1997) exited the driver's seat of the vehicle wearing a black jacket, dark pants, a black ski mask, and carrying a black handgun. Singleton ran northbound. Officer Conner gave chase to Singleton and ordered him to drop the gun. Singleton ignored Officer Conner's commands and continued to flee northbound, jumped over a wall at 13407 Byars Road and then ran eastbound on 132nd Terrace. Officer Conner was able to tackle Singleton to the ground in front of 7403 E 132nd Terrace and take him into custody. While Officer Conner returned Singleton to his patrol vehicle, Officer Goode recovered the handgun Singleton dropped while he fled from officers - a Glock 17 (S/N:LFX816) between 7400 and 7402 E 132nd Terrace. The gun was later examined and placed into property where it was discovered that the gun had been modified to be fully automatic (the gun contained an aftermarket shim which prevented the firing pin from resetting). The Glock 17 also had a 31 round magazine which contained 18 live rounds upon examination by officers.

Deputies with Cass County had taken the passenger, [REDACTED] (b/f [REDACTED] 0), into custody after a foot chase. Deputies recovered a Glock 19x from [REDACTED] blue purse in a front pocket. [REDACTED] was wearing the purse draped over her shoulder and neck at the time of the foot chase. The gun recovered from [REDACTED], upon further examination, was believed to have been modified to be fully automatic (the gun contained an aftermarket shim which prevented the firing pin from resetting).

Singleton was transported to a local hospital where he was treated for a sprained ankle and transported to the Grandview Police Department, 1200 Main Street, Grandview, Jackson County, Missouri, 64030, where he was processed and placed in a cell.

Cass County Deputy [REDACTED] recovered an AK-47 style pistol (micro draco) from the vehicle. Cass County was instructed by Grandview officers they intended to hold the vehicle for a search warrant and to cease inventory of the vehicle at that time.

Officers also established a crime scene on the East Outer Road, south of 141th St, and north of the roundabout and recovered a cluster of four 9mm shell casings in the southbound lane of traffic and median, one 9mm shell casing to the west of the cluster of four shell casings in the grassy median between the highway and the outer road, one 9mm shell casing to the north of the group of five 9mm shell casings, one 9mm shell casing on the east side of the east outer road (northbound lanes), and a cluster of three 9mm shell casings on the west side of the East Outer Road (south of 141st Street). The shell casings were recovered as evidence.

The vehicle was towed to the Grandview Police Department (1200 Main Street, Grandview, Jackson County, Missouri 64030) and placed in an evidence bay where it was held for processing. It should also be noted, after a records check, the vehicle was determined to be stolen out from North Kansas City, Missouri.

In plain view, there was also merchandise (perfume and makeup) from Ulta which was stolen from the retail store in Overland Park, Kansas. The property was identified by Detective David Zickel with Overland Park Police Department. Detective Zickle advised the blue plastic recycling container was used in the burglary that occurred at Ulta in Overland Park. Detective Zickle tracked the movements of Singleton and Blount through a tracker which was inside stolen merchandise from Ulta – because of this, Detective Zickel was alerted to another possible burglary at World’s Liquor (601 NW 68th Street, Kansas City, Missouri 64118)

Detective Zickel with Overland Park, Kansas Police advised that he contacted the owner of World's Liquor, [REDACTED], who advised his business was burglarized last night and multiple items of liquor was stolen (KCPD report number 23014868 and assigned to Detective Halford).

Inside the vehicle, and in plain view, Detective Elias observed a blue plastic recycling container in the front passenger seat which contained numerous bottles of alcohol. Based upon the tracking location on the property from Ulta as well as the location of another burglary, it is believed the liquor/alcohol inside the vehicle was stolen from World’s Liquor.

Furthermore, both Singleton and [REDACTED] were on video surveillance wearing the same clothing during the commission of that crime as they were when they were apprehended by Grandview officers and Cass County deputies.

Also inside the vehicle, in plain view, was a large amount of cash in an open center console.

A records check of Singleton revealed he has previously plead guilty to Robbery (2015) and Unlawful Use of Weapon (2018).

During a search of the vehicle subsequent to a search warrant, detectives located several gun magazines for 9mm ammunition, gun magazines for .223/.556 ammunition, and gun magazine for 7.62 ammunition. Detectives also located a flip cell phone in the center console in a cubby in front of the shift knob and a tan purse with identification belonging to K.W.

Formal interviews were conducted with both [REDACTED] and Singleton. [REDACTED] confirmed that Singleton picked her up in the Hyundai Elantra and that he was driving when Officers attempted to stop them. [REDACTED] was asked which gun Singleton fired out the window at Officers and she stated she knew all the guns were filled so which ever gun was empty was the one. [REDACTED] was asked how she knew all the guns were filled and she stated that she watched “him do it.” [REDACTED] further stated that Singleton filled them before they “took off that day.” [REDACTED] confirmed that Singleton was the individual that shot at the Officers pursuing them. When Singleton was contacted he asked if [REDACTED] was still in custody, and when he was advised she was, Singleton immediately spontaneously uttered “all I know is bro whatever happened you can throw that shit on me.” Singleton then, without prompting or questioning, further stated “whatever charges you all bring up, all that shit on me bro.” Detective

Bennings advised Singleton that he would like to speak to him regarding the events overnight and he stated “you already know what happen, high speed, you know what happened, everything was red handed, you know it’s all right there. All that shit was on me I was driving and she was in the back seat.” After the above spontaneous utterance, Singleton was advised of his rights and asked to explain in his own words the events that occurred on 03/10/2023, which he advised that he was pulled over “forcefully” and went to jail. Singleton further advised that the Hyundai Elantra did not belong to him and that he was not the registered owner. Singleton was asked who the Hyundai Elantra belonged to and he stated that he had no idea and that he had found the vehicle. Singleton was asked if he pointed a gun out of the Hyundai Elantra and he stated that he would need a lawyer for all that type of stuff.

Detective Bennings obtained and reviewed police reports from the Cass County Sheriff’s Office and noted in Deputy Riffle’s report his account of the events. Deputy Riffle indicated that he observed the driver of the vehicle (Singleton) stick a firearm out the driver’s side window and pointe the firearm toward his patrol vehicle at which time Singleton fired multiple rounds at him.

/s/ Jon Bennings, 225
DETECTIVE

THE COURT FINDS PROBABLE CAUSE.

JUDGE

DATE