

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

POLICE NO. :	KC23015944
PROSECUTOR NO. :	095473843
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DARION HALL)	
4321 East 7th Street)	CASE NO. 2316-CR
Kansas City, MO 64124)	DIVISION
DOB: 02/10/1999)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
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 on or about March 14, 2023, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Elizabeth A. Stivers, caused the death of Elizabeth A. Stivers by strangling 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. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class D felony of tampering in the first degree, punishable upon

State vs. Darion Hall

conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 14, 2023, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a white Ford F-150, an automobile.

The range punishment for a class D 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 seven (7) 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.

Count III. Attempted Stealing - Physically Take (570.030-036Y20202399.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class E felony of attempted stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 14, 2023, in the County of Jackson, State of Missouri, the defendant tried to physically take a cash register drawer from Walgreens and the cash register drawer was property in the possession of Walgreens, and such conduct was a substantial step toward the commission of the crime of stealing, and was done for the purpose of committing such stealing.

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/ Hallie L. Schuman

State vs. Darion Hall

Hallie L. Schuman (#66333)
Assistant Prosecuting Attorney
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Independence, MO 64050
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HSchuman@jacksongov.org

WITNESSES:

1. DET Sarah E. Bedell, 1125 Locust, Kansas City, MO 64106
2. PO Scott C. Fixler, 1125 Locust, Kansas City, MO 64106
3. PO Briana Hawley, 1125 Locust, Kansas City, MO 64106
4. CST Eden Kuhn, 1125 Locust, Kansas City, MO 64106
5. CIV Darin Lee, 901 Charlotte St, Kansas City, MO 64106
6. [REDACTED]
7. DET Lauren E. Montgomery-Gist, 1125 Locust, Kansas City, MO 64106
8. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
9. CST Benjamin Simmons, 2645 Brooklyn Ave., Kansas City, MO 64127
10. CST Gregory VanRyn, 2645 Brooklyn Ave, Kansas City, MO 64127
11. PO Kayla Wagaman,

PROBABLE CAUSE STATEMENT FORM

Date: 03-18-2023

CRN: KC23-015944

I, Detective Darin Penrod #4288 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 03-13-2023, at 4317 E 7th Street in
(Date) (Address)

Kansas City, Jackson Missouri Darion Hall
(County) (Name of Offender(s))

B/M, 02-10-1999 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 03-14-2023 at approximately 2116 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 4317 E 7th Street Kansas City, Jackson County, MO on a reported disturbance. Upon arrival officers located the female victim in the yard of the residence. KCFD-EMS conducted life saving measures on the victim who was suffering from apparent trauma. The female victim was transported to an area hospital where she was declared deceased by medical staff. Members of the 1020 Homicide Squad responded to investigate. **The Jackson County Medical Examiner’s Office has ruled this investigation a homicide and cause of death as strangulation.**

The victim’s mother (Witness #1) was contacted by detectives and provided a statement in regard to this investigation. She stated she was inside the residence she shares with the victim and advised the victim told her she was going to go back over to the neighbor’s residence located at 4321 E 7th Street. She stated the victim left the residence at approximately 2100 hours, and at approximately 2110 hours she went outside the residence to let the dogs outside into the front yard where she commonly lets them go. She re-entered the residence to grab a flashlight and her cell phone. When she exited the residence and went back outside she heard a rustling noise coming from the side of the residence and believed it to be a rodent. She advised she went to the side of the residence and observed the victim lying on the ground. She immediately called her son at work and advised what she had located, and then checked the victim for signs of life. She observed a tall, slender black male approximately late 20’s to early 30’s between 5’09 and 6’00 tall. She stated the individual asked if she needed help and she told him to keep walking. She described the clothing worn by the subject as a white hooded sweat shirt with small black triangles with the hood up. She was on scene after she called for police and KCFD-EMS to respond and remained on scene after the victim was transported to an area hospital. She stated she did not see the subjects face; however initially she believed the subject was the stepson of the residents of 4321 E 7th but was unable to specifically say it was him. She stated the stepmother of the possible subject came over to her residence and asked her “did Darion do this” (██████████ identified as **Darion Hall B/M, 02-10-1999**).

PROBABLE CAUSE STATEMENT FORM

CRN KC23-015944

Witness #2 (step mother of **Hall**) stated she and the victim had been together prior to the discovery of the victim at her residence at the residence of 4321 E 7th Street. She stated they were together talking on the porch, smoking, and cleaning up the residence. She stated the victim left to run home at approximately 2045 hours. She stated at approximately 2111 hours, she stated she called the victim when she heard someone yelling outside and wanted to know if the victim heard it to. She described it as possible people yelling at one another and advised the victim didn't answer her phone. She stated she thought the victim had possibly gone to bed and that is why she didn't answer the phone. She stated she saw the fire truck and observed the victim's mother in the side yard of her residence and asked her what happened. She observed KCFD-EMS carrying the victim to the ambulance and again asked the #1 witness what had occurred. She stated she was shown a photograph from an officer of **Hall** and identified him as being her step son. She stated an officer also showed her a picture from surveillance camera located at a Walgreen's nearby where an attempted robbery occurred. In the surveillance video a suspect was captured on video and a still picture was shown to Witness #2. She stated she told the officers it resembled **Hall** and advised the victim had told her **Hall** was observed wearing a black and white hoodie when she saw him earlier in the day. She stated the victim and **Hall** had been rumored to have a physical relationship in the past. She advised the victim did have a boyfriend; however she didn't see his vehicle the day of the homicide. She advised she has an Ex-Parte Order of Protection against **Hall** due to his violent nature. She advised when **Hall** drinks he cannot handle his liquor and "acts weird".

Halls behavior for the day leading up to the homicide is as follows and has been documented in reports as well as collected video surveillance. On 03-14-2023 at approximately 1843 hours, Officers were dispatched to 2401 Cleveland Ave Kansas City, Jackson County, MO on a reported stolen auto. The victim of the stolen auto advised officers his grandson, identified as **Hall**, had taken the white Ford F-150 without permission and has never had permission to drive the vehicle. The truck was located by Officers abandoned near 7th and Norton (Google maps shows 2 minute drive from victim's residence) after being observed by a family member near the address of 4321 E 7th Street being driven by **Hall**.

Hall is observed on surveillance video at the Phillips 66 located at 5712 Independence Ave Kansas City, Jackson County, MO on 03-14-2023 at 18:42:49 (19:43:49 actual time)). **Hall** is observed walking into the store and confronting a customer just inside the front doors. **Hall** is observed reaching into the pockets of the victim, grabbing a cigarette from victim's mouth, pushing the victim with open hands, and punches the victim with a closed fist in the face. **Hall** is observed chasing the victim out of the store and across the parking lot off camera view at 18:43:56 (19:44:56 actual time). **Hall** is observed chasing the victim on city camera westbound toward the Walgreen. There is no report for this as the victim did not call police to report the incident.

Hall is observed on surveillance video on 03-14-2023 at 19:49:10 (actual time) entering the Walgreens located at 5400 Independence Ave Kansas City, Jackson County, MO. At 1955 hours, Officers were dispatched to the location in regard to an attempted Strong-Armed Robbery of a Business. Surveillance video was collected in regard and detectives observe **Hall** entering the business, walks to the front counter, moves around behind the counter, attempts to open the drawer with his hands, shoves a clerk who walks away, attempts to open the drawer again by punching the screen, and pulling at the drawer again. **Hall** jumps over the counter when unsuccessful in opening the drawer and breaks a plexi-glass COVID Shield and exits the business at 19:52:28 (actual time).

PROBABLE CAUSE STATEMENT FORM

CRN KC23-015944

Hall is observed to be wearing the same clothing in each of the aforementioned surveillance videos and specifically the hoodie he is wearing when taken into custody with apparent blood on it.

Hall was arrested in close proximity (3432 E 16th Street Kansas City, Jackson County, MO); on 03-14-2023 at 21:28:29. **Hall** was approximately 9 blocks west of scene and matched the physical description provided by Witness #2. He matched the description of the suspect linked to the aforementioned incidents as well. **Hall** was observed to have apparent blood on his clothing and abrasions to his hands when he was taken into custody. On the scene of his arrest he was non-compliant and refused to take his hands from his pockets when directed to do so. Once officers had him in handcuffs and attempted to take off his hood he became aggressive and attempted at one point to hit an officer with a head butt. **Hall** was placed onto the ground and kept in place until a transport wagon arrived for transport. **Hall** was transported to Metro Detention Facility where he was processed for perishable evidence after resisting and wrestling with officers of the KCPD Detention Unit (captured on surveillance video inside detention). While waiting for KCPD Crime Scene Technician Simmons to arrive, a detective standing near the detention counter near the bench **Hall** was seated on overheard **Hall** state without provocation, "They gonna catch me for a Robbery and not what I really did".

On 03-15-2023 at approximately 1150 hours, Detectives responded to Metro Patrol Detention to complete an interview with **Hall**. Prior to the interview beginning detectives activated the audio and video system in the interview room to capture the interview in its entirety with **Hall**. **Hall** was read his Miranda Rights aloud and advised he understood his rights by shaking his head and when he asked verbally whispered "yes". He stated on the day of the homicide he had been at his grandfathers and was drinking. He stated he had been drinking quite a bit and couldn't remember anything about the date, where he had gone, or what he had done. When asked if **Hall** remembered driving his grandfather's truck (documented under KC23-015910- Stolen Auto) or being at a Walgreen's and involved in an attempted strong armed robbery (documented under KC23-015926) he stated he didn't know. **Hall** was advised officers had located surveillance video of him in the same clothing he was arrested in. The photos were compared to the two aforementioned offenses and an additional attempted strong armed robbery which was not reported to police. He stated he still didn't remember any of that and stated he was drunk all day. **Hall** was shown a single color photo of the victim and denied knowing her. After detectives explained the process moving forward and the physical evidence which would be compared between he and the victim, he advised he does know the victim, provided the name "Elizabeth", and advised she lived close to the residence his father and stepmother share. **Hall** denied seeing the victim at any time on the date of the homicide and after being supplied with a glass of water requested to be taken back to his room and stated "I don't wanna talk to you anymore. The interview was ended and he was returned to the detention unit he was released per further investigation.

On 03-17-2023, detectives of the 1020 Homicide Squad requested a rush analysis from the Kansas City, Missouri Crime Laboratory of the DNA collected and associated to the victim to be tested against the clothing **Hall** was arrested in. The Lab Analysis documented in Lab Report #7 responded back and confirmed the blood tested on the NIKE Hoody **Hall** was wearing is that of the victim. The statistical analysis is documented as: **The**

PROBABLE CAUSE STATEMENT FORM

CRN KC23-015944

genetic profile from Item 002.1 is 530 septillion times more likely to be observed if ELIZABETH STIVERS is the contributor than if an unknown individual is the contributor.

Based on the above information detectives are requesting an arrest warrant for **Hall** in regard to the homicide of Elizabeth Stivers W/F 11-25-1991 at 4317 E 7th Street Kansas City, Jackson County, MO on 03-14-2023. It has been determined **Hall** has a current Order of Protection against him from his stepmother, had been involved in two separate attempted strong armed robberies at nearby businesses leading up to the homicide, and to have been observed driving a white Ford F-150 he had stolen from his grandfather previously in the day. He has shown to be violent and used his bare hands to inflict the damage and ultimate death to the victim.

Printed Name Darin Penrod Signature /s/ Det. Darin Penrod #4288

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

Judge

Circuit Court of _____ County, State of Missouri.