

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

<b>POLICE NO. :</b>	KC22065334
<b>PROSECUTOR NO. :</b>	095471934
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MARLANDO MARTIN-HOSKINS</b>	)	
<b>2929 Flora Ave.</b>	)	<b>CASE NO. 2316-CR</b>
<b>Kansas City, MO 64109</b>	)	<b>DIVISION</b>
<b>DOB: 06/01/2005</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200911.0)**

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 September 26, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Maurice Brown, caused the death of Maurice Brown by shooting him, and defendant is further given 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 Maurice Brown as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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.

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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 September 26, 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 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 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 September 26, 2022, at E 30th St. and Montgall Ave., in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons namely Maurice Brown and, as a result of the above described conduct, Maurice Brown 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 (571.015-001Y20205299.0)**

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 September 26, 2022, 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.

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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/ Jamie K. Hunt*  
Jamie K. Hunt (#50401)  
Assistant Prosecuting Attorney  
415 E. 12th Street  
Floor 7M  
Kansas City, MO 64106  
jhunt@jacksongov.org

**WITNESSES:**

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106  
[REDACTED], 415 E 12th St, Floor 11, Kansas City, MO  
64106
3. PO Matthew J. Deloux,
4. DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106
5. CST Meagan Ingram, 2645 Brooklyn Ave., Kansas City, MO 64127
6. PO William S. Pritchett, 1125 Locust, Kansas City, MO 64106
7. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
8. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
9. CST Kelli Sharp, 2645 Brooklyn, Kansas City, MO 64127
10. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
11. CST Gregory VanRyn, 2645 Brooklyn Ave, Kansas City, MO 64127
12. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 05-04-2023

CRN: KC22065334

I, Detective Ryan Taylor, #5585, KCPD Homicide Unit  
(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 09-26-2022, at 31<sup>st</sup> Street and Prospect Avenue in  
(Date) (Address)

Kansas City, Jackson Missouri Marlando Martin  
(County) (Name of Offender(s))

B/M committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 09-26-2022 at approximately 1341 hours, officers of the Kansas City, Missouri Police Department were dispatched to the area of 30th and Montgall, Kansas City, Jackson County, Missouri on a reported sound of shots. Upon their arrival, they located the victim, Maurice Brown, on the sidewalk at the intersection of 30th and Montgall, deceased from an apparent gunshot wound.

The Jackson County Medical Examiner ruled the victim's death a homicide.

On 09-26-2022 at approximately 1341 hours, officers of the Kansas City, Missouri Police Department were dispatched to the area of 30th and Montgall, Kansas City, Jackson County, Missouri on a reported sound of shots. Upon their arrival, they located a victim on the sidewalk at the intersection of 30th and Montgall, deceased from an apparent gunshot wound.

The Jackson County Medical Examiner ruled the victim's death a homicide.

Detectives contacted Witness #1 at the scene. Witness #1 stated she was walking southbound on Prospect, when she observed what she believed to be a black Nissan going the wrong way on 30th Street from Wabash. She stated a male in a grey sweat suit, with the hood pulled up, got out of the vehicle armed with a "long gun" and looked to the south. The male got back into the vehicle. She stated the driver turned north onto Prospect. She further stated the same person that got out of the vehicle, fired the one gunshot from the vehicle, towards the apartment building.

Witness #1 stated she went east on 30th when she observed the victim running. She stated she realized he had been shot. The witness further stated she initially thought the suspect was shooting at her due to the shot being fired near her. The witness stated there were two males in the front seat and two females in rear seat. She further stated all of the subjects appeared to be "teens."

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During the investigation, video surveillance recovered from area businesses, detectives observed a grey four door Honda traveling eastbound on 30th Street from Wabash, which is a one-way for westbound traffic. The vehicle stopped at Prospect, and the front passenger (unknown person, wearing a light grey sweat suit with the hood cinched round his or her face), walked alongside the vehicle, peered around the corner armed with a long rifle. The unknown person then entered the vehicle. The driver turned northbound onto Prospect Avenue and appeared to slow down. As they approached the witness that was walking southbound on the east side of Prospect. The witness reacted as if startled. The vehicle continued north before turning eastbound on 29th Street.

The vehicle was determined to be a grey 2005 Honda bearing Missouri license plate TJ9J9G, with a DOR address of 8736 Crescent Avenue.

The vehicle was located at 87th and Hillcrest occupied by three juveniles, by covert assets on 09-27-2022. The occupants were taken into custody without incident.

The occupants of the vehicle were interviewed at Police Headquarters. They indicated that the suspect of the shooting was in the vehicle and shot an AR-15 style rifle with a magazine” and went by the name of “Lando.”

A follow up interview was conducted with Witness #2, who was in the vehicle at the time of the shooting. Witness #2 stated she was the girlfriend of “Lando.”

Witness #2 was presented with a photograph of Marlando Martin B/M 06-01-2005 to which she identified as the Marlando present on the day of the homicide and the individual shot out of their vehicle.

Witness #2 stated that after they left and went south, Marlando went to work at his job at Jimmy John's.

On 10-18-2022 at approximately 15:55, Marlando MARTIN was taken into custody by officers at 8427 Wornall Road, Kansas City, Jackson County, Missouri. He was transported to 1125 Locust Street for questioning.

MARTIN was advised of his Miranda Warning and Waiver via a DJO with the Jackson County Juvenile Court. MARTIN's mother, Kimberly Martin, was present in the interview. MARTIN acknowledged his rights and agreed to speak with the detectives.

MARTIN stated that he and his girlfriend, Witness #1, and other people went to Popeyes (31st and Prospect) to get food. While at Popeyes an older black male walked out of the store and started to talk at them in an aggressive manner. The unknown male then walked across the street to the library. MARTIN stated he was mad by the interaction and called his “brother” to determine who this unknown individual was. MARTIN stated that his “brother” told him to walk away. The unknown male pulled a taser and then stated cocking a gun that was in his waistband. MARTIN stated that he and the group

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walked away and went to the vehicle they arrived in. MARIN stated that they made the block and drove by a pawn shop. MARTIN stated he got out of the vehicle to see if the individual was following them. MARTIN stated that he was armed with a rifle. MARTIN stated that he didn't see the unknown male so he got back into the car. The occupants of the vehicle then stated "there he is!" – referring to the unknown male from the library. MARTIN that the male was walking up Prospect behind parked cars with a gun out and cocking it. MARTIN stated that while observed the unknown male cocking the gun he decided he would shoot him before the unknown male shot him. MARTIN stated he shot only once.

It should be noted that video and physical evidence at the scene are not consistent with the statement that MARTIN provided to law enforcement.

Printed Name Det. Ryan Taylor, #5585 Signature \_\_\_\_\_

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

\_\_\_\_\_  
Judge

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