

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

POLICE NO. :	KC23040896
PROSECUTOR NO. :	095474975
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
KEIVON M GREENE)	
4211 Bellefontaine Ave.)	CASE NO. 2316-CR
Kansas City, MO 64130)	DIVISION
DOB: 07/07/1996)	
Race/Sex: B/M)	
████████████████████)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y20201399.0)**

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 June 25, 2023, in the County of Jackson, State of Missouri, the defendant shot at the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of ██████████ 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.

Count II. 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,

State vs. Keivon M Greene

committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about June 25, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree, as 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.

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/ Caitlin Brock
Caitlin Brock (#67964)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106

State vs. Keivon M Greene

(816) 881-3571
cbrock@jacksongov.org

WITNESSES:

1. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
2. PO Davon M. Hughes, 1125 Locust, Kansas City, MO 64106
3. DET Kenneth M. Lightner, 2640 Prospect Ave., Kansas City, MO 64127
4. DET Robert A. Maser, 1125 Locust, Kansas City, MO 64106
5. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106
6. DET Ephraim Vega, 1125 Locust, Kansas City, MO 64106
7. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106
8. [REDACTED] County Prosecuting Attorney's Office

PROBABLE CAUSE STATEMENT FORM

Date: 06-25-2023

CRN: KC23040896

I, Detective Ephraim Vega #5606
(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 06-25/2023, at 5644 Prospect Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Keivon Greene
(County) (Name of Offender(s))

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

Aggravated Assault

The facts supporting this belief are as follows:

On 06-25-2023, at 0438 hours, Officers with the Kansas City Missouri Police Department were dispatched to 57th Street and Prospect Avenue, Kansas City, Jackson County, Missouri on a reported shooting.

Upon arrival, officers observed a deceased party (Victim #1) lying in the middle of the road on 57th Street between Prospect Avenue and Wabash Avenue, along with multiple shell casings in the street and around the body. Officers observed a second deceased party (Victim #2) located in the parking lot of 5700 Prospect Avenue with additional shell casings throughout the parking lot. Officers located a third deceased party (Victim #3) in the parking lot of 5644 Prospect Avenue along with several more shell casings throughout the parking lot.

Officers were advised of six (6) additional victims that were shot and transported to area hospitals. Victim #4 was transported to St. Luke’s Hospital on the Plaza. Victims 5, 6 and 7 along with suspect #2 were transported to Research Medical Center. Victim #8 was transported to Center Point Hospital in Independence.

Detectives from the 1010 Homicide Squad along with members of the Crime Scene Investigations Unit responded to process the scene. Search Warrants were obtained for 5700 and 5644 Prospect Avenue through the Jackson County Courts to gain access to the properties.

On 06/25/2023, detectives responded to St. Luke’s Hospital where they contacted victim #4 who stated the following: She arrived at the club (5644 Prospect) around 0300 hours on 06/25/2023. Upon arrival, she walked to the entrance of the club where she saw suspect #1 standing with his girlfriend (victim #5). Victim #4 stated she gave suspect #1 and victim #5 a hug. While giving suspect #1 and victim #5 a hug, victim #4’s boyfriend (victim #1) walked up and told suspect #1 to “watch his hands.” Suspect #1 moved away from victim #4 and as she and victim #1 turned to walk away, victim #4 turned and saw suspect #1 pull out a handgun from his pocket and shoot victim #1 in the back.

PROBABLE CAUSE STATEMENT FORM

CRN KC23040896

After suspect #1 started shooting at victim #1, suspect #2 pulled out an unknown firearm and shot victim #4, striking her in the buttocks. Victim #4 ran into the club to take cover and heard the sound of continued gunfire outside of the location. When the gunfire ceased, victim #4 exited the club and observed victim #3 lying on the ground and appeared to be deceased. Victim #4 then went over to victim #1, who was lying in the street, and observed him to be deceased as well. Victim #4 stated she sat down on the ground next to Victim #1 until Police and EMS arrived on scene, at which time she was transported to St. Luke’s Hospital. Victim #4 stated she knew suspect #1 and suspect #2 from school and provided names for both suspects.

On 06-25-2023, detectives responded to Research Medical Hospital to conduct an interview of suspect #2 and he stated the following: He had just walked out of the club and noticed a male in his underwear causing a disturbance. A short time later, he began hearing gunshots coming from everywhere. He then noticed he was struck by gunfire in the hand. He was then self-transported to the hospital.

While at Research Medical Center, detectives then contacted victim #7 and he stated the following: Victim #7 was sitting in the passenger seat of a silver BMW somewhere down the street from the club. He then began hearing gunshots coming from everywhere. A bullet struck the windshield of the vehicle causing shards of glass to hit his eyes. He exited the vehicle thinking he was shot in the face, and was self-transported by an unknown person to Research Medical Center.

On 06-25-2023, at 0908 hours, detectives responded to 5841 Elmwood to contact Victim #4 and present three (3) single photo line-ups of possible involved parties. Victim #4 identified the individual in Photo #1 as Suspect #1. Victim #4 stated Suspect #1 is the person who shot her boyfriend (Victim #1) in the back. Victim #4 confirmed identification by initialing the bottom of the photo.

Victim #4 identified the individual in Photo #2 as Keivon Greene. Victim #4 stated Keivon is the person that shot her in the back. Victim #4 confirmed identification by initialing the bottom of the photo. Victim #4 identified the individual in Photo #3 as Victim #5. Victim #4 stated Victim #5 is Suspect #1’s girlfriend and was present during the shooting but was not involved. Victim #4 confirmed identification by initialing the bottom of the photo.

Printed Name Detective Ephraim Vega #5606 Signature /s/Detective Ephraim Vega #5606

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

Judge

Circuit Court of _____ County, State of Missouri.