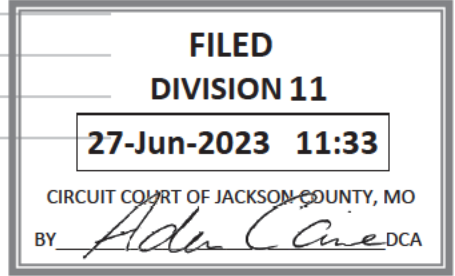


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC23040896
PROSECUTOR NO. :	095474993
OCN:	



STATE OF MISSOURI,)
)
PLAINTIFF,)
vs.)
)
KEIVON M GREENE)
4211 Bellefontaine Ave.)
Kansas City, MO 64130)
DOB: 07/07/1996)
Race/Sex: B/M)
)
)
DEFENDANT.)

**CASE NO. 2316-CR
DIVISION**

**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 June 25, 2023, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Camden Brown, caused the death of Camden 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 Camden 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.

Count II. Armed Criminal Action (571.015-001Y20205299.0)

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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 June 25, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, as 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. 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 June 25, 2023, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Nikko Manning, caused the death of Nikko Manning 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 Nikko Manning 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.

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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 June 25, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, as charged in Count III, 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 V. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-003Y20200999.0)

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 June 25, 2023, in the County of Jackson, State of Missouri, Jasily Strong was killed by being shot as a result of the

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perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by the defendant on or about June 25, 2023, in the County of Jackson, State of Missouri.

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 VI. 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 June 25, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, as charged in Count V, 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.

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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.

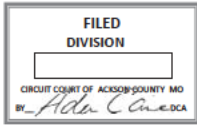
JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Caitlin Brock
Caitlin Brock (#67964)
Assistant Prosecuting Attorney
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11th Floor
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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. 

PROBABLE CAUSE STATEMENT FORM



Date: 06/25/2023

CRN: KC23040896

I, Detective Danny Thomas #4933 (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)

Felony murder ACA

The facts supporting this belief are as follows:

On 06/25/2023, at 0438 hours, Officers of 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 57th Street between Prospect Avenue and Wabash Avenue, along with multiple spent shell casings in the street and around the body. A second deceased party (Victim #2) was located lying in the parking lot of 5700 Prospect Avenue along with additional spent shell casings throughout the parking lot. A third deceased party (Victim #3) was located in the parking lot of 5644 Prospect Avenue along with several more spent shell casings throughout the parking lot. All three parties had apparent gunshot wounds to their bodies.

Officers were advised of six (6) additional victims who were shot and transported to area hospitals with apparent non-life-threatening injuries

Detectives and Crime Scene Technicians responded to process the scene. Search Warrants were obtained for 5700 and 5644 Prospect Avenue to gain access to the properties and collect surveillance video.

On 06/25/2023, detectives responded to an area hospital and 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 they 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.

After suspect #1 started shooting, suspect #2 (later identified as Keivon Greene) pulled out a firearm and shot victim #4, striking her. Victim #4 ran into the club to take cover and heard the sound of continued gunfire

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outside of the location. When the gunfire ceased, victim #4 exited the club and observed victim #3 lying on the ground, deceased. Victim #4 then went over to victim #1, who was lying in the street, and observed him to be deceased as well. She sat down on the ground next to Victim #1 until Police and EMS arrived on scene and transported her to the 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 the hospital to conduct an interview of suspect #2 (Greene) who was not known to be a suspect at the time of the interview. He stated he just walked out of the club called "After Hours", with his brother, suspect #1, and noticed a male in his underwear causing a disturbance. A short time later, he began hearing gunshots coming from everywhere. He noticed he was struck by gunfire in the hand, so he and his brother, suspect #1, dove behind a car. They were transported to the hospital by an unknown male, along with victim #5.

On 06/25/2023, at 0908 hours, detectives responded to Victim #4's residence, and presented three (3) single photos of possible involved parties based on information she provided in an earlier interview.

Victim #4 identified the individual in Photo #1 as Suspect #1. Victim #4 stated Suspect #1 is the person who she believed 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 Suspect #2, Keivon Greene. Victim #4 stated Greene is the person that she believed 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.

On 06/25/2023, detectives obtained video surveillance footage of the incident from cameras affixed to the building at 5644 Prospect Avenue. The video depicts multiple vehicles and persons standing outside the business.

At 12:15:14 hours on 06/24/2023 (DVR time) detectives observe a male in a white shirt approach two (2) unknown females standing in the street on E 57th Street between Prospect Avenue and Wabash Avenue. The male in the white shirt appears to have a short conversation with them and then walks westbound on 57th Street, where he stops and speaks to another male approximately 25 feet away.

At 12:15:29 hours on 06/24/2023 (DVR time), detectives observe a different male approach the same two (2) unknown females, give them a hug and interact with them.

At 12:16:10 hours on 06/24/2023 (DVR time), detectives observe a male with long dreads walk over to the second unknown male and begin to have a conversation.

PROBABLE CAUSE STATEMENT FORM

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At 12:16:25 on 06/24/2023 (DVR time), detectives observe the unknown male in the white shirt walk over from 25 feet away and begin to shoot into the group. After shooting into the group, the male in the white shirt turns to his right and begins to shoot at a group of people in the parking lot of 5700 Prospect Avenue. After shooting at the group of people in the parking lot, the male in the white shirt moves out of camera view and is not seen again.

On 06/26/2023, victim #4 responded to police headquarters and was escorted to 7th floor interview room #2 to view a clip of the surveillance footage from 5644 Prospect Avenue. Upon reviewing the footage, she stated she and victim #5 are the two (2) individuals standing in the street between Prospect Avenue and Wabash Avenue. She identified the male in the white shirt who is seen on the video firing into the group of people as Keivon Greene (who was later observed on hospital surveillance video wearing a white t-shirt).

While watching the surveillance video, victim #4 stated she now believed that she and victim #1 were actually shot by Keivon Greene.

Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

The Court finds probable cause and directs the issuance of a warrant this 27th day of June, 2023.

Adele Caine
Judge

Circuit Court of Jackson County, State of Missouri.