

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

<b>POLICE NO. :</b>	KC23039430
<b>PROSECUTOR NO. :</b>	095475219
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MEKHI DONNELL CURRY</b>	)	
<b>4247 Agnes Avenue</b>	)	<b>CASE NO. 2316-CR</b>
<b>Kansas City, MO 64130</b>	)	<b>DIVISION</b>
<b>DOB: [REDACTED]</b>	)	
<b>Race/Sex: B/M</b>	)	
<b>S.S.N.: [REDACTED]</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. 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 19, 2023, in the County of Jackson, State of Missouri, Marquis Kindred was killed by being shot as a result of the perpetration of the class D felony of stealing under Section 570.030, RSMo, committed by the defendant on or about June 19, 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 II. Stealing - Firearm/Explosive Weapon/Ammonium Nitrate (570.030-037Y20202399.0)**

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 D felony of stealing, punishable upon conviction under Section 558.011, RSMo, in that on or about June 19, 2023, in the County of Jackson, State of Missouri, the defendant appropriated a firearm, which property was in the possession of Marquis Kindred, and defendant appropriated such property without the consent of Marquis Kindred and with the purpose to deprive Marquis Kindred thereof.

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.

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  
(816) 881-3571  
cbrock@jacksongov.org

**WITNESSES:**

The State's witnesses as of 7/17/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

**PROBABLE CAUSE STATEMENT FORM**

Date: 07/10/2023

CRN: KC23039430

I, Detective Robert Maser #5374, 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 06/19/2023, at [REDACTED] in  
(Date) (Address)

Kansas City, Jackson Missouri Mekhi D Curry  
(County) (Name of Offender(s))

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

The facts supporting this belief are as follows:

On 06/19/2023 at 1445 hours, Officers of the Kansas City Missouri Police Department were dispatched to [REDACTED] in regard to a shooting.

Upon arrival officers located two victims in the front yard of the residence suffering from apparent gunshot wounds. Both victims were transported to an area hospital for treatment of their injuries.

Detectives were notified that Victim #1 had succumbed to his injuries and was pronounced deceased at 1620 hours.

Crime scene technicians and detectives processed the scene and observed a split-level residence with the numbers [REDACTED] located on the front of the residence. A [REDACTED] bearing temporary tag [REDACTED], VIN [REDACTED], was located in the driveway. To the north of the vehicle, detectives located a large amount of blood which contained 3 spent shell casings (Blazer 9mm, FL 9mm Luger, and Speer 9mm Luger). Green and orange colored cigarette lighters were located to the north of the blood. A pair of blue colored sandals, a white colored towel, a brown colored towel, a blue and white colored hooded zip up sweatshirt, a grey tee shirt, and a black iPhone with black case, were located in the front yard, west of the driveway. Detectives observed blood droplets on the front railing of the residence leading to the front door. A doorbell camera was located just to the west of the front door. Detectives entered the residence and observed blood droplets leading to the kitchen.

Victim #2 was contacted and provided the following statement:

He contacted his cousin, identified as Mekhi Curry B/M [REDACTED], through Facebook Messenger in regard to purchasing some marijuana. Curry arrived at the residence in a silver sedan that backed into the driveway. Curry got out of the passenger seat, but the driver remained inside of the vehicle. Victim#1 had a handgun tucked in his waistband, and Curry expressed interest in trading for it. The two of them walked over to

**PROBABLE CAUSE STATEMENT FORM**

CRN KC23039430

the silver sedan where Curry showed them several firearms in the back seat, persistently asking Victim #1 if he was interested in trading. Victim #1 declined the offer and after about 30 minutes, Curry asked Victim #1 to see the firearm again. Victim #1 handed it to him, but Curry immediately turned around and ran away. Victim #1 chased after him, and a scuffle ensued as they fought over the firearm on the ground. Curry managed to free himself from Victim#1 and fled with the stolen firearm, getting into the silver sedan. Simultaneously, the front driver's door opened, and an armed male, later identified as [REDACTED], emerged from the vehicle. [REDACTED] immediately began firing, hitting Victim #1 and Victim#2. [REDACTED] entered the vehicle with Curry and quickly left the scene. Victim #2 attended to Victim #1, who appeared to have been shot in the chest. Victim #2 recognized the driver as [REDACTED] and had encountered him several times in the past. [REDACTED] is a close friend of Curry and both belong to the gang known as "THF" or "Trigger Happy Family.

Victim #2 positively identified Mekhi Curry B/M [REDACTED], through a photo lineup, and advised he was his cousin.

Victim #2 provided consent for detectives to download messages between Curry and him through Facebook Messenger. Several messages were located between the victim's account and Facebook account 100026913420282 (Thf Khi) belonging to Curry.

During the investigation Victim#2 learned the identity of suspect #2 and provided detectives with the name [REDACTED]. The name was consistent with a male who used the moniker of [REDACTED].

Victim#2 positively identified [REDACTED], through a photo lineup, as the suspect who shot him and Victim#1.

Detectives contacted Witness #1 (Victim's mother). Witness #1 received a phone call from Victim #2 who told her that he and Victim #1 had been shot and to call the police. Witness #1 returned to the scene and was contacted by detectives. Witness #1 reviewed her doorbell video footage and recognized one of the suspects as "Mekhi Dudley" a cousin to both of the victims. Witness #1 advised Mekhi had stayed over the house in the past. At the conclusion of the interview, Witness#2 provided detective video footage capturing the incident up until officers arrived.

Detectives contacted Witness #2 who advised she was asleep inside the residence and was awakened when Victim #2 ran inside the residence yelling "We got shot". Witness #2 followed Victim #2 outside and observed Victim #1 bleeding. Witness #2 applied pressure to the injury with a towel until EMS arrived. Witness #2 reviewed doorbell video footage and stated she observed a gray Chevrolet Malibu in the driveway. Witness #2 identified the front passenger of the vehicle as "Mekhi Dudley". Mekhi is a cousin of the victims and has frequented the house on a several occasions in the past.

Detectives reviewed video footage from a doorbell camera located at [REDACTED]. The footage shows a silver sedan backing into the driveway of the address. Two males, referred to as Victim#1 and Victim#2, exited the residence. Victim#2 approached the silver sedan and had contact with the front passenger identified as Mekhi Curry. Meanwhile, Victim#1 stood by a second vehicle parked in the driveway. The front passenger (Curry) walked towards the white sedan, accompanied by Victim#2, to meet Victim#1. Shortly

**PROBABLE CAUSE STATEMENT FORM**

CRN KC23039430

afterward, Curry suddenly ran from the white sedan towards the street, followed by Victim#1. A fight broke out between Victim#1 and Curry, with Victim#2 running towards the altercation. At this point, detectives observed the front driver's door of the silver sedan open, and an individual identified as [REDACTED] exited the vehicle. A gunshot was heard, after which both Curry and [REDACTED] got back into the silver sedan and fled the scene.

On 07/16/2023 Mekhi Curry was arrested by the Kansas City Missouri Police Department on an unrelated incident. Curry was subsequently transported to the Jackson County Detention Center in regard.

On 07/17/2023 Detectives checked out Curry from the Jackson County Detention Center and transported him to Police Headquarters to obtain a formal statement. During his statement Curry acknowledged knowing both victims as his cousins but denied having any knowledge of the incident.

I believe Mekhi Curry will not appear upon a summons.

The underlying offense is related to a serious felony currently being investigated by Kansas City Missouri Police Department which is punishable by significant penalties that incentivize the defendant to fail to appear

Printed Name Detective Robert Maser #5374 Signature /S/ Det. Robert Maser #5374

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

\_\_\_\_\_

Judge

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