

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>POLICE NO. :</b>	23-077852
<b>PROSECUTOR NO. :</b>	095476692
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MARKANTHONY T GREER</b>	)	
<b>212 N. Jennings Ave.</b>	)	<b>CASE NO. 2316-CR</b>
<b>Independence, MO 64056</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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205299.0)**

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 November 10, 2023, at 18813 E 39th St, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm another person or persons [REDACTED], and/or [REDACTED] and, as a result of the above described conduct, [REDACTED] suffered injury or death.

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,

committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about November 10, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count One, 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.

**Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205299.0)**

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 November 10, 2023, at 18813 E 39th St, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm another person or persons [REDACTED], and/or [REDACTED] and, as a result of the above described conduct, [REDACTED] [REDACTED] suffered injury.

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 November 10, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of weapon charged in Count Three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of 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.

**Count V. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205299.0)**

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 November 10, 2023, at 18813 E 39th St, in the County of Jackson, State of Missouri, the

defendant, knowingly shot a firearm another person or persons [REDACTED] and/or [REDACTED] and, as a result of the above described conduct, [REDACTED] suffered injury.

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 November 10, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count Five, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use 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.

State vs. MarkAnthony T Greer, Case No.

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/ Jeremy J. Baldwin  
Jeremy J. Baldwin (#62734)  
Assistant Prosecuting Attorney  
321 West Lexington Avenue  
Independence, MO 64050  
(816) 881-4592  
jbaldwin@jacksongov.org

**WITNESSES:**

The State's witnesses as of 11/13/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

## PROBABLE CAUSE STATEMENT

Date: 11/11/23

Report #: 23-77852

I, S. Breshears, a Detective with the Independence, Missouri Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 11/10/23 at 1424 Hours, MARKANTHONY GREER, committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 11/10/23, around 14:24 hours, officers responded to a shooting at Independence Center, 18813 E 39th ST. On an off-duty assignment at Dillard's, Officer Gaudreau was the first to arrive. She found VICTIM 1, four months pregnant, on the floor near the North entrance/exit, bleeding from the head with an apparent critical gunshot wound near the right front temple. VICTIM 1 was part of GROUP 1. Two other victims were located, Victim 2 was shot in the leg and Victim 5 was also shot in the leg.

Surveillance footage revealed GROUP 1, including VICTIM 1 (shot in the head and currently on life support), VICTIM 2 (shot in the leg), VICTIM 3, and VICTIM 4, arriving at the mall in a green Ford at approximately 14:07 on 11/10/23.

Inside the mall, at the North entrance/exit, they encountered GROUP 2, consisting of Defendant, MARKANTHONY GREER, INVOLVED 1, and INVOLVED 2. GROUP 2 was leaving the mall as GROUP 1 entered. INVOLVED 1, having a previous relationship with VICTIM 3, reported being in a current relationship with MARKANTHONY GREER, with whom she shares a child. INVOLVED 1 stated that VICTIM 3 and MARKANTHONY GREER, not getting along, engaged in a verbal argument. INVOLVED 1 claimed someone from GROUP 1 pulled out a gun from a backpack and started shooting.

VICTIM 5, who was in the area and uninvolved with either group was also shot in the leg.

INVOLVED 1 and the rest of GROUP 2 fled to the parking lot to escape the gunfire. INVOLVED 2 then drove them in an unidentified gray or silver Chrysler 300 to Centerpoint Hospital, dropped everyone off, and left the scene. INVOLVED 2 and the silver Chrysler are still being sought.

Detectives viewed mall surveillance footage that showed the two groups come together, appearing to talk, and then GROUP 1 following GROUP 2 to the breezeway between the two rows of glass doors at the North entrance/exit. VICTIM 1 sat on a bench inside the mall and didn't follow along with GROUP 1. The shooting occurred in the breezeway area and VICTIM 1 appears to be shot as she falls over from where she had sat down on a bench about thirty feet south of the breezeway.

GROUP 1 abandoned VICTIM 1 and went to Centerpoint Hospital in the green Ford Taurus across the street. The officers stopped the Ford Taurus in the southwest parking lot of the Sarah Cannon Cancer Institute at Centerpoint Hospital. VICTIM 3 and VICTIM 4 were taken into custody for questioning and VICTIM 2, who had been shot in the leg was taken to the hospital.

Witnesses interviewed by detectives recalled hearing multiple gunshots fired during the shooting and investigators recovered numerous shell casings from the scene including one 9mm casing from inside the breezeway. Outside the mall doors there were five 40 caliber shell casings found.

On 11/10/23 around 1446 hours, Detective Kennon interviewed WITNESS 1 on the scene at the mall as she had been entering the mall and was inside the breezeway as the gunfire erupted. WITNESS 1 advised she was entering the mall and walking next to the guy who was shooting. She said he was walking with the gun in his left hand. She saw the gun and described it as gold in color. She said he had it next to his body and by his side. She said she could hear shots behind her. She said the man she saw walking with the gun was a black male, slim/tall, 6'0", 25-30 years old. This matches MARKANTHONY GREER's appearance. She could not remember what he was wearing but stated he had blood down the back side of him.

Detective Breshears interviewed VICTIM 2. VICTIM 2 viewed a photo lineup with six pictures. VICTIM 2 considered the lineup and said the person in position 3, MARKANTHONY GREER, was the person who became angry with him and his group in the mall and fired a gun back into the mall at him and his group. VICTIM 2 said he had gone to the mall with the people from GROUP 1 and had not been there long before encountering GROUP 2. He said he recognized INVOLVED 2 and acknowledged her and said hello. VICTIM 2 said MARKANTHONY GREER immediately became agitated as he was Layla's boyfriend and father of her child. VICTIM 2 Mr. Banks and VICTIM 3 followed MARKANTHONY GREER and INVOLVED 1 as they moved to the north exit doors. VICTIM 2 said MARKANTHONY GREER had a posture of his hands inside of his front hoodie pockets as if he were already holding a gun inside the pocket. VICTIM 2 said he felt threatened by this posture so he moved a backpack he was carrying from his back to his front so he could access his gun for protection. VICTIM 2 said he never drew or fired his gun as MARKANTHONY GREER pulled his gun first and began firing at him in a southward direction into the mall. VICTIM 2 said he and everyone else immediately fled back into the mall for cover as MARKANTHONY GREER, INVOLVED 1, and INVOLVED 2 ran to the parking lot.

VICTIM 1 had taken a seat on a mall courtesy chair to the south behind VICTIM 2 and was in the direct line of fire from MARKANTHONY GREER. VICTIM 1 was shot in the head and critically injured.

Detective Breshears interviewed VICTIM 3 who recounted the same events as VICTIM 2. VICTIM 3 viewed a photo lineup with six pictures. VICTIM 3 considered the lineup and said the person in position 3, MARKANTHONY GREER, was the person who became angry with him and his group in the mall and fired a gun back into the mall at him and his group. VICTIM 3 said he had been armed with his gun for personal protection. He said after the shooting, in which he was shot in the leg, he drew his gun from his waistband for protection during the chaos. He said he did not fire any rounds.

VICTIM 2 and VICTIM 3 both described MARKANTHONY GREER as taller than INVOLVED 1.

Detective Breshears interviewed MARKANTHONY GREER. Detective Breshears read aloud, and MARKANTHONY GREER followed along and read his Miranda warning of rights. MARKANTHONY GREER signed the waiver of the rights.

MARKANTHONY GREER said he recalled being involved in an incident at the mall with another group of people but could not recall who, why, or how he ended up being shot in the back. He said he didn't recognize or know anyone from the other group and didn't know if any of them were armed or if any of them fired a shot. MARKANTHONY GREER said he couldn't even recall who drove him to the hospital in his car. He then could not recall the make, model, or color of his vehicle. MARKANTHONY GREER said he was not armed and as far as he knew INVOLVED 2 was not armed either.

S. Breshears; Detective

/s/ S. Breshears

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Print Name

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Signature