

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

POLICE NO. : KC23078949

PROSECUTOR NO. : 095476861

OCN: HU017350

**FILED
DIVISION 29**

28-Nov-2023 12:25

CIRCUIT COURT OF JACKSON COUNTY, MO
BY *Jane Hode* DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

KEYLEN J. MADGE

900 E. Armour, #205

Kansas City, MO 64109

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

CASE NO. 2316-CR

DIVISION

DEFENDANT.

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y20200904.0)

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 November 18, 2023, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to [REDACTED], caused the death of [REDACTED] by shooting him., and defendant is further given notice that should the State of Missouri submit murder in the second degree - felony murder under Section 565.021.1(2), RSMo, it will be based on the death of [REDACTED] 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 (571.015-001Y20205213.0)

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 November 18, 2023, 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 (571.030-020Y20205213.0)

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, RSMo, committed the Class B 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 18, 2023, at [REDACTED], in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at another person or persons, [REDACTED].

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. 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 November 18, 2023, in the County

State vs. Keylen J. Madge, Case No.

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.

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/ Lauren Whiston

Lauren Whiston (#66185)
Assistant Prosecuting Attorney

415 E. 12th St., 11th Fl
Kansas City, MO 64106

(816) 881-4312

lwhiston2@jacksongov.org

WITNESSES:

The State's witnesses as of 11/28/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORMDate: 11/24/2023CRN: KC23078949

FILED DIVISION 29 28-Nov-2023 12:20 CIRCUIT COURT OF JACKSON COUNTY, MO BY <u>[Signature]</u> DCA

I, Detective Sarah Bedell #5693, of the 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 11/18/2023, at [Redacted] in
 (Date) (Address)

Kansas City, Jackson Missouri Keylen Madge
 (County) (Name of Offender(s))

R:B S:M DOB: [Redacted] committed one or more criminal offense(s).
 (Description of Identity)

The facts supporting this belief are as follows:

On 11/18/2023 at approximately 2303 hours, Officers of the Kansas City Missouri Police Department were dispatched to the area of [Redacted], Kansas City, Jackson County, Missouri, in regard to sound of shots. Officers were advised that five (5) shots were heard and there were multiple parties screaming behind an unknown residence.

Upon arrival, Officers approached the intersection of [Redacted], observed a large gathering of people on the south side of [Redacted] and were flagged down by people yelling, "He's back here, help him". Officers went behind [Redacted] (a vacant residence) to get to the backyard of [Redacted]. Officers observed the victim, lying face down on the east side of a concrete retaining wall, approximately three (3) feet down. The victim was nearly unconscious and was transported to a local hospital where he was pronounced deceased at 2347 hours.

Several witnesses advised they were at the [Redacted], located at [Redacted], when an altercation broke out between females. The fight spilled outside of the bar and the Suspect shot the Victim.

Officers contacted Witness #1, the Victim's fiancé, who advised while at the bar, the Suspect, a black male, mid-twenties, short dread locks and wearing a colorful shirt, approached her from behind and put his hands on her. The Victim approached the Suspect and told him to get his hand off of her. A fight ensued outside and continued westbound on [Redacted]. She then heard multiple gunshots and saw the Victim run further west and then turn south on Lawn Avenue. She noticed blood on the ground and believed her fiancé to have been shot.

Witness #2 was contacted by Officers on scene and stated she observed the Victim and an unknown black male, who she described as approximately 5'10 and had short dreads, wearing a red and black shirt,

PROBABLE CAUSE STATEMENT FORM

CRN KC23078949

fighting near [REDACTED]. She heard multiple gunshots and observed "flashes" coming from the unknown black male with short dreads. She observed both the Victim and the unknown black male begin running.

While on scene, witnesses pointed out a black Honda Accord that was leaving the area and advised they were involved. Officers got the vehicle stopped at [REDACTED] and contacted Subject #1 and Subject #2. Both Subject #1 and #2 were transported to Police Headquarters for a formal statement.

Subject #1, who was wearing a blue t-shirt and jeans that were open down the legs (can be seen in surveillance video), stated she was at [REDACTED] with her best friend and cousin (wearing all red in surveillance video) after attending a memorial for her son who passed away. While at the bar, her cousin got into a fight with another woman. She believed the other woman was the new girlfriend of her friend's, sister's, ex-boyfriend. The fight continued outside and she eventually got her cousin into the vehicle. She stated when they left, it had just been a fight between women and the only involvement the men had was trying to break up the fight. Subject #1 advised that her cousin only lives a block away from the bar so they went to her house for about twenty minutes. Subject #1 stated she and Subject #2 left and went back to the bar to find her shoes. When they got there, they saw police and asked someone what happened. They were told someone had been shot. At that time, they left to go to another cousin's house and that is when they were stopped by police.

Subject #2 stated she arrived at [REDACTED] with some friends after attending Subject #1's son's memorial. While at the bar, a fight broke out involving Subject #1 and they were removed from the bar. While outside, emotions were still high and a group of males assisted with getting them all inside Subject #1's vehicle. She advised that she was driving, Subject #1 was in the passenger seat and Subject #1's cousin got into the backseat. Subject #1 advised her shoes came off so Subject #2 returned to the bar to look for the shoes. When they returned, they were told someone was shot. She stated Subject #2's cousin lived close to the bar so they dropped her off at her residence and then continued driving when they noticed a police car behind them and were then pulled over.

On 11/19/2023, Detectives obtained surveillance video from inside and outside the [REDACTED], [REDACTED]. The video captures a physical fight between Witness #1 and a female wearing a red sweat suit inside the bar. Witness #3 can be seen getting involved in the altercation as well. As the bouncers move the parties involved towards the door, the Suspect, wearing a colorful sweatshirt, comes from a back room behind the bar towards the front door. The fight continues outside of the bar and the Suspect can be seen punching Witness #3. Witness #1 and #3 go back inside the bar. Back inside the bar, a bouncer appears to be escorting Subject #1 out of the bar. Subject #1 goes outside and appears to meet up with the Suspect and the female in all red. A few minutes later, the Victim and Witness #1 walk out of the bar. The Suspect and female in all red appear to have been waiting for them to exit. The Victim walks up to the female in red and the female in blue (Subject #1) and the Suspect follows. The group seem to be talking and then it appears another argument starts and the Suspect can be seen gesturing to the Victim to come on as if he wants to fight. Another male approaches the Victim and pulls him back and they walk to the sidewalk. The Suspect, still in the street, goes out of camera view. The Victim walks down the sidewalk in the same direction as the Suspect and goes out of camera view. The Victim and Witness #1 walk back into camera view to the front of the bar. After a few seconds, they walk

PROBABLE CAUSE STATEMENT FORM

CRN KC23078949

back in the same direction (west) out of view. Approximately three (3) minutes later, uninvolved parties standing in front of the bar can be seen reacting to something and ducking.

Detectives obtained surveillance video from a residence at [REDACTED] who wished to remain anonymous and advised his cameras cut in and out and did not capture the shooting. One resident advised his girlfriend was awoken by four (4) sound of shots. He walked outside and observed an unknown party picking up shell casings near their residence. The footage their cameras captured is blurry but shows people walking in the street and you can hear what sounds like several females arguing. In another video a female can be heard crying. In another camera angle that is positioned more northwest, the homeowner comes out of the residence and walks towards the sidewalk. Several cars are seen leaving, two males are standing across the street and one female is leaning on a truck that is parked on the roadway. There are possibly two or three other females standing at the southwest corner and you can hear females yelling.

On 11/20/2023 at approximately 0930 hours, another witness, Witness #4, contacted the Homicide Unit by phone and stated he was at [REDACTED] when a fight broke out between several females. They were escorted out of the bar and the fight continued outside. Witness #4 stated he heard a female make a phone call and said, "These bitches are trippin, come up here real quick". About 3-4 minutes later, he stated he observed a male walking from Lister Ave between houses, walk up to the Victim and exchange words. He heard gunshots and saw the male shoot the Victim. Witness #4 advised that he did not think the Victim was shot because he saw him take off running down the street. Witness #4 advised he got into his car and followed the Suspect who walked into [REDACTED]. The female he heard make the phone call walked down the street and joined the Suspect on the porch. He heard the female ask the Suspect, "Did you shoot him". The Suspect said, "yeah" and the female said, "Good, now those bitches won't fuck with me again". Witness #4 stated the female told the Suspect to get inside of [REDACTED]. He described the Suspect as a black male, approximately 30 years old.

Screenshots of the Suspect were taken from the surveillance video. A bulletin was disseminated department wide in an attempt to try to identify the Suspect. On 11/21/2023, a department member advised the pictured Suspect was related to them and was Keylen Madge. They provided a cell phone number for Madge. A Google search of the phone number responded back to Madge.

On 11/27/2023 at approximately 1230 hours, Madge responded to Police Headquarters with his attorney. Madge and his Attorney were escorted to an interview room. I read Madge the Miranda Warning and his attorney advised he would not be making any statements.

On 11/27/2023 at approximately 1445 hours, Witness #1 responded to Police Headquarters for a formal interview. She advised she got into a fight with a female who was the sister of the victim's child's mother. The fight moved outside and her sister was hit by the Suspect. She described the Suspect as a black male with dreads, and wearing a "red, green, a shirt with some colors in it". She went back inside to tell the Victim her sister was just hit by a guy and she and the Victim walked outside together. The Victim told her to go to the car and as she got to the car, she heard gunshots. She looked up and saw the Suspect standing in the middle of the street, holding a gun. The Suspect then pointed the gun at her sister who had just been standing near the Victim. She did not see where the Suspect went and could not find the Victim, so people started calling his phone and they found him behind a house. Witness #1 was shown still photographs from the surveillance footage at the

PROBABLE CAUSE STATEMENT FORM

CRN KC23078949

bar. She positively identified the Suspect in the photograph with the colorful hoodie as the person she saw holding the gun.

On 11/27/2023 at approximately 1615 hours, I responded to the address of Witness #2. She stated there was a fight inside the bar that led outside and she was told by her sister that a man hit her in the face. Witness #2 stated she went outside and observed the Suspect who she described as dark skinned, 5'8-5'9, dreads that were pulled back, a big nose, big lips, wearing jeans and a hoodie that was multi-colored "green, red, squared out" possibly bandana print. She asked him why he was hitting girls. She advised things seemed to eventually calm down and she was putting her shoes back on when she heard the Victim from behind her tell the Suspect very calmly, "bro, we can't be hittin no girls". She stated she turned towards the Victim and saw her cousin's eyes get wide and then she heard a gunshot. The Victim took off running and the Suspect continued shooting 3-4 more times. She described the Suspect holding the gun down low, almost under his hoodie and advised she saw him "smirk". She stated she started to run towards the Victim but her cousin pulled her down to the ground and then the Suspect pointed the gun at them before he turned around and got into a black car. Witness #2 was shown still photographs of the surveillance footage and she positively identified the Suspect in the photographs with the colorful hoodie as the person she saw shoot the Victim.

While at the residence, Witness #5 stated she also saw some of the incident. She stated she was at the bar with her family when she was punched in the head and a fight broke out. She walked to her vehicle and observed the Suspect, wearing a colorful hoodie "Gucci like", with dreads, run to a vehicle. As she got to her vehicle, she heard gunshots and looked down the street and saw the suspect holding a gun down low and walking towards her auntie and cousin. The Suspect took off and she drove her vehicle down by the girls but no one could find the Victim so she started calling his phone and then her family found him. She also viewed the photos that were shown to Witness #2 and she said that was the person she saw hold the gun that was pointed towards her cousin and auntie.

Due to the above mentioned facts documented during the course of the investigation, we believe that Madge represents a clear danger to the community.

Printed Name Detective Sarah Bedell #5693 Signature /s/ Detective Bedell #5693

The Court finds probable cause and directs the issuance of a warrant this 28th day of November, 2023.

SIGNED BY JUDGE

*This is a redacted public document. The original
unredacted document bears the Judge's signature.*

Judge

PROBABLE CAUSE STATEMENT FORM

CRN KC23078949

Circuit Court of Jackson County, State of Missouri.