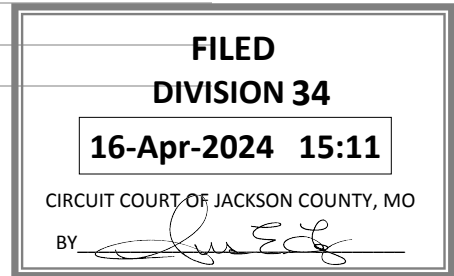


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	24-002439
PROSECUTOR NO. :	095478629
OCN:	



STATE OF MISSOURI,)
)
) **PLAINTIFF,**)
)
 vs.)
)
)
)
 MARQUIS EARL-LEE SAVANNAH)
 618 Sunset Lane)
 Raymore, MO 64083)
 DOB: [REDACTED])
 Race/Sex: B/M)
 S.S.N.: [REDACTED])
)
 DEFENDANT.)

CASE NO. 2416-CR
DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about April 13, 2022, in the County of Jackson, State of Missouri, the defendant, after deliberation, knowingly caused the death of [REDACTED] by shooting him, and that the defendant was eighteen years of age or older at the time of the offense.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

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 April 13, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder 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/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)

State vs. Marquis Earl-Lee Savannah, Case No.

Assistant Prosecuting Attorney
321 West Lexington Avenue
Independence, MO 64050
(816) 881-4592
jbaldwin@jacksongov.org

WITNESSES:

The State's witnesses as of 4/16/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

16-Apr-2024 15:09

CIRCUIT COURT OF JACKSON COUNTY, MO

BY

CRN 2024-002439

STATEMENT OF PROBABLE CAUSE

Date: 04-16-2024

I, Detective Jason Floyd, a detective with the Blue Springs, Missouri Police Department, upon my oath, and under penalties of perjury, state as follows:

1.) I have probable cause to believe that on April 13th, 2024, at 1100 SE Adams Dairy Parkway, Blue Springs, Jackson County, Missouri, MR. MARQUIS EARL SAVANNAH, W/M, DOB 12-05-2007, committed one or more criminal offense(s).

2.) The facts supporting this belief are as follows:

On 04-13-2024 at 2231 hours **Blue Springs Police Officers** were dispatched on a shooting. Officers were initially dispatched to Ward Park 1000 SW 22nd Street, near the Volleyball Courts on the shooting. Officers realized that Ward Park did not have volleyball courts and dispatch was able to determine through additional 911 calls that the correct location was Wilbur Young Park, 1100 SE Adams Dairy Parkway, Blue Springs, Jackson County, MO.

Upon arrival at 2234 hours, Officers initially located **Victim 1** laying in the parking lot near the volleyball courts. Officers Burner, Lockhart, and Van Hoecke began life saving measures on Victim 1, who was observed to have an apparent gunshot wound to his chest and right leg. Officers performed CPR until CJCFPD arrived to assume care. When Sergeant Walters arrived, he was flagged down by bystanders and learned that **Victim 2** was located in the grass near the basketball court, which is south of the volleyball courts. Victim 2 was being cared for by **Witness 2**, who advised Victim 2, his cousin, had been shot multiple times. Sergeant Walters located apparent gunshot wounds to Victim 2's chest, side, and buttocks. CJCFPD arrived and took over care of Victim 2. Victim 1 and Victim 2 were both transported to area hospitals. Officer Burner responded to the hospital, arriving at 2300 hours. While there, Officer Burner learned that Victim 1 was pronounced deceased at 2311 hours and Victim 2 was pronounced deceased at 2332 hours. At 2243 hours, dispatch advised an additional call came in with a gunshot Victim located at an address in the neighborhood directly west of Wilbur Young Park. Sergeant Nick Goettling responded there and located **Suspect 2**, who had an apparent gunshot wound to his right calf. Suspect 2 advised that he had been at the park and when he heard shooting, he began running away westbound but couldn't because his leg hurt, so he hid in some trees. Suspect 2 was transported to an area hospital for treatment. Officers that remained at Wilbur Young Park set up crime scene tape, separated and interviewed witnesses, and placed evidence placards on observed pieces of evidence.

I responded and contacted Sergeant Walters who advised me of what he knew about the events. Sergeant Walters advised me of the 3 people shot and their hospital locations. He advised me that initial interviews with witnesses indicated that there had been a fist fight, and then there had been shooting by multiple unknown parties. He also advised that there were multiple shell casings of both pistol and rifle caliber in the parking lot, several cell phones left on the ground, and an empty holster was located under the bleachers near the basketball courts. The evidence collected from the scene by Detectives or patrol officers included a Taurus Millennium G2 9mm pistol, one Glock magazine, at least 28 shell casings including 9mm, .40 caliber, and .223 caliber, 7 bullet fragments, one unspent bullet, 3 cell phones, a Chromebook, broken

jewelry, one gray Air Jordan shoe, a pair of black Nike shoes, one "bubble slide" shoe, an empty pistol holster, and a shirt that had been used to try and stop bleeding on Victim 1.

Sergeant Hughes and Sergeant Goettling both began reviewing city owned cameras at the park. The initial review of the cameras showed that multiple subjects were involved in what appeared to be a verbal altercation in the middle of the parking lot drive lane. Suddenly another subject enters the area of the disturbance, rushes toward one subject and tackles him. At that point multiple guns are drawn, and shots are fired. Once the shots are fired, all of the bystanders at the park began to flee to their cars, towards the roadway, and into the wooded areas of the park. The camera shows that one of the shooting suspects enters the backseat of a 4-door sedan occupied by two females that were in the front seat. The vehicle then begins to leave the area but gets stopped in traffic in the parking lot. At that time another male subject approaches the car and enters before the sedan leaves. The cameras showed that the other shooting suspects fled on foot going westbound.

Sergeant Goettling used the Flock camera system to identify the sedan that the shooting suspect entered. The vehicle was identified as a dark blue 2011 Chevrolet Cruze with MO license ZG2H9W. Based on that information, I had dispatch enter and attempt to locate for the vehicle into the computer system.

On 04-15-2024 at about 0900 hours, **Blue Springs School District Police Department Chief Mike Russell** was working at Valley View High School when he was contacted by a school counselor. The counselor had received information from a student who insisted on anonymity. The reporting student advised that among students present at the shooting were Witness 5, Other 1, Suspect 1, and Other 2, and that Suspect 1 and Other 1 were somehow involved. Chief Russell forwarded the information by email to the Blue Springs Police Department.

On 04-15-2024 at about 1158 hours, Blue Springs Police Sergeant Emberton received a Flock hit on the Chevy Cruze in the area of NW 7 Highway and NW Duncan Rd. Sgt. Emberton then observed the Cruze exiting the dryer doors at Go Car Wash, 2015 NW 7 Highway. The vehicle then went to the vacuum cleaners. Sgt. Emberton conducted a high-risk car check and identified the occupant of the car as **Suspect 3**. Suspect 3 was observed vacuuming out the rear driver's side seat. Suspect 3 was taken into custody and transported to an interview room at the police station. At 1436 hours, **Blue Springs Police Detective Kate Tipton, Jackson County Deputy Juvenile Officer Michael Grimes** and I conducted an interview with Suspect 3, along with her father. **Parent 11**. After DJO Grimes read Suspect 3 her rights, she and her father agreed to speak with us. We asked Suspect 3 to describe what happened at the park. Suspect 3 said that she was at the park hanging out and when she heard gunshots, she ran to her car to leave. She said that she did not know anyone involved in the incident. After being told that camera footage showed that one of the suspects entered her car before she left, and another subject entered as she was leaving, Suspect 3 said that people were running everywhere and just getting into random cars. Suspect 3 said that she did not know who got into her car, and that she just started driving. I showed Suspect 3 a still image from the camera footage of the subject approaching her car as she left. She identified that subject as **Witness 5** and then said that he got out of the car again before she left the parking lot. Suspect 3 said she took the other person in her car to a neighborhood across the street from the park and he got out. Suspect 3 said that the only person she knew that was in her car was her friend **Witness 13**. Upon further questioning, Suspect 3 said that the person in her car might have been someone like "E" or "Z."

After the interview, Detective Tipton then went to review the camera footage in greater detail. That review revealed that on 04-13-2024 at about 2157 hours Suspect 3 arrived in the Chevrolet Cruze. At 2202 hours, Suspect 3, **Suspect 1** (who witnessed advised goes by his middle name), **Suspect 2**, and **Other 1** all entered the Chevrolet Cruze and remained inside the car. At about 2227 hours there was a fist fight involving **Witness 1** and an unknown Male. All of the occupants of the Cruze exited to watch the fight. Then around 2230 hours Suspect 3, Suspect 2, Other 1, are seen standing in the driveway in front of where her car was parked, appearing to be in a verbal altercation with Victim 1, Victim 2, and **Witness 2**. At that time, **Witness 3** was also in the area, standing near her car. Suspect 3 is seen waving her hands toward Victim 1, Victim 2, and Witness 2. Then Suspect 1 walked from behind Suspect 3's car towards the verbal altercation, went around to the south of the altercation, and charged Victim 1. Victim 1 appeared to immediately recognize Suspect 1 and made a motion consistent with starting to draw a gun from his waistband. Suspect 1 tackles Victim 1 and they fight. During the fight, an AR style rifle is produced and dropped near Victim 1, as Victim 1 is on the ground. Suspect 1 picks up the rifle and runs west away from Victim 1 across the drive lane, turns to face Victim 1, and begins firing the rifle at him. Suspect 1 then fired the rifle at Victim 1 as Victim 1 was laying on the ground. Suspect 1 walked up to Victim 1 while firing the rifle at him, then stopped next to him and continued firing at Victim 1. The video shows at least 8 muzzle flashes from the rifle as Suspect 1 shot at Victim 1. The video also shows Suspect 2 who was involved in the initial verbal disturbance. After Suspect 1 charges and tackles Victim 1, Suspect 2 drew a handgun and began firing at Victim 2. Suspect 2 then ran towards where Suspect 1 and Victim 1 were fighting on the ground and fired at least one round at Victim 1 as he was on the ground and then left the park running westbound across Adams Dairy Parkway. Victim 1 suffered multiple gunshot wounds to his chest and legs. Victim 2 suffered a grazing chest wound, an apparent bullet wound through his side, and gunshot wounds to his buttocks or legs. Victim 1 did not move from the location Suspect 1 shot him at. Victim 2 ran east through the sand volleyball court and then south to the grass near the basketball court where he met Witness 2 who attempted to provide him medical care.

In the video footage, Suspect 2 is wearing light-colored ripped jeans, a hooded sweatshirt, and wearing what appears to be a cross body bag or satchel on his front side. Suspect 1 is wearing what appears to be a "letterman style jacket" with a dark body of the jacket and lighter colored sleeves, dark pants, and some sort of head covering. Suspect 2's clothing on the camera is consistent with suspect 2's clothing when he was contacted by Sgt. Goettling and Officer Bullard, except he did not have the bag with him at that time.

On 04-14-2024 at about 1427 hours Detective Tipton and I conducted an interview at the police station with Witness 1. During the interview, Witness 1 told us that when he was at the park he was wearing black shorts, a black hoody, and a black t shirt under that. Witness 1 said that he had been involved in the fist fight at the park with someone named "Mark" that he had previously had a fight with in December 2023 at the Blue Springs Walmart over allegations of a stolen gun. Witness 1 said that after the fight broke up, he began walking towards his truck and thought that his brother, Victim 2, was walking behind him. Then he heard Suspect 2 yell "Get the fuck back." He also heard Suspect 2 say, "Bitch ass nigga stop playing with me." Witness 1 said that he knew Suspect 2 from school and recognized him by both appearance and voice. He described him as wearing a black ski mask and carrying a bag on the front of his body.

On 04-14-2024 at about 1520 hours Detective Tipton and I interviewed Witness 2. Witness 2 said that he knew Suspect 2 and described him as having short hair and carrying a bag or satchel. Witness 2 described Other 1 as having braids or curls in his hair and said he was 17 or 18 years old. Witness 2 said that he also knew Witness 3, who he described as wearing "big boots" the night of the incident. Witness 2 described

Suspect 1 as having a short hair cut, wearing a ski mask but it was “flipped up like a doo rag.” Witness 2 said that Suspect 1 is the “type that wears baggy clothes.”

On 04-14-2024 at 1608 hours Detective Tipton and I conducted an interview with Witness 3 while Witness 1 was present. Witness 3 said that she drove her little cousin and friends to the park, but she just stayed with her car because she didn’t know anyone at the park. Witness 3 said that she was parked along the parking spots facing Adams Dairy Parkway. Witness 3 said that she recognized Suspect 1 at the scene. Witness 3 identified Suspect 1 by calling him by his middle name and said that she had went to school with Suspect 1 at Valley View High School. Witness 3 said that Suspect 1 was wearing a “letterman style’ jacket that had a red sleeve and a yellow sleeve. She said he had on black pants and a white shirt underneath the jacket. Witness 1 said that Suspect 1 was in the grass area, describing the grass between the parking lot and Adams Dairy Parkway. Witness 3 said that Suspect 1 was yelling at someone, but she did not hear what he was saying or if anyone was yelling back. Witness 3 said that Suspect 1 walked past the cars to the parking lot and as soon as he did the shooting started.

On 04-16-2024 **Detective Carol Denmark** conducted an interview with **Witness 19** who stated that he was at Wilbur Young park during the incident. Witness 19 said that there was a fight, but he did not see who was fighting. He said after the fight, a male around 5’06” came up and yelled, “Everybody get back.” Witness 19 said that the male was holding a dark navy “bluish” Dior designer bag and had his hand in the bag. The male was wearing a navy-blue hoodie, tight jeans with rips, and white Nike shoes. Witness 19 said that someone rushed someone else and that was when the first shot went off. He said the first shot was fired by a black male wearing all black, with a black gun. The male who rushed the other subject was described as 5’08” black male with “dreads” and estimated to be about 20 years of age. The male that rushed was wearing a white and red jacket like a “winter wind breaker”, and black and white adidas joggers. Witness 19 said that after the first shot, three more people pulled out “something” and everyone started shooting. Witness 19 said he ran towards the woods, but then went back to find a friend and when he did he saw two bodies on the ground and saw someone wearing all black shooting someone on the ground.

On 04-16-2024 at Detective Denmark conducted an interview with **Witness 20**. Witness 20 said that she was at Wilbur Young Park during the incident. She said that a fight happened, and she and her friends got into a car. She said that after the fight stopped, another fight broke out. Witness 20 said that one guy tackled someone else to the ground and shot him. Witness 20 did not know the subjects involved but said the male that tackled the other subject was wearing a letterman style jacket and described it as “orangish yellowish.” Witness 20 described the subject in the letterman jacket as a dark-skinned black male and that he had pulled his gun out and it was a foot to 15 inches long, black, and had a long clip at the end of it. Witness 20 said that when the shooting stopped, she and her friends ducked down in the car and left as soon as they could.

On 04-16-2024 Detective Tipton spoke with a doctor from the Jackson County Medical Examiner’s Office. At that time the Medical Examiner’s report was unavailable, but the doctor advised that Victim 1 and Victim 2 both died of homicide from multiple gunshot wounds.

Detective Jason Floyd #1784
Blue Springs, Missouri Police Department

/S/ Det J. Floyd #1784
Signature