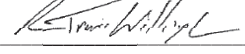


06-Dec-2024 14:46

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

CIRCUIT COURT OF JACKSON COUNTY, MO

BY  DCA

POLICE NO. :	KC24060349
PROSECUTOR NO. :	095481553
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

vs.)

DERRION S TURNER)

820 WOODLAND AVE, Apt. 105)

Kansas City, MO 64106)

DOB: [REDACTED])

Race/Sex: B/M)

S.S.N.: [REDACTED])

DEFENDANT.)

CASE NO. 2416-CR

DIVISION

COMPLAINT
WARRANT REQUESTED**Count I. Accessory Murder 2nd Degree (565.021-001Y20200999.2)**

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 August 5, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly or with the purpose of causing serious physical injury to Dyamond Shields, caused the death of [REDACTED] by shooting him, and the defendant is further given notice that should the state submit murder in the second degree under Section 565.021.1(2), it will be based on the death of [REDACTED] as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030.9, 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)

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 August 5, 2024, 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 August 5, 2024, at E. 70th and Prospect Ave., in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a crowd of people which included [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. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

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 August 5, 2024, in the County 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.

Count V. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about August 5, 2024, in the County of Jackson, State of Missouri, the defendant knowingly possessed a handgun, a firearm, and on August 24, 2023, the defendant was convicted of the felony of unlawful possession of a firearm in the U.S. District Court for the Western District of Missouri.

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.

State vs. Derrion S Turner, 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/ Paul M. Conklin III

Paul M. Conklin III (#66958)
Assistant Prosecuting Attorney
415 E. 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3824
PTConklin@jacksongov.org

WITNESSES:

The State's witnesses as of 12/6/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 10/31/2024CFN: KC24060349
06-Dec-2024 14:45

CIRCUIT COURT OF JACKSON COUNTY, MO

BY [Signature] DCAI, Detective Alexis Vega #5528, 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 08/05/2024, at E. 70th Terrace and Prospect Avenue in
(Date) (Address)Kansas City, Jackson County Missouri Derrion Turner
(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 08/05/2024 at approximately 0151 hours, Officers were in the area of E. 70th Street and Prospect Avenue, Kansas City, Jackson County, Missouri, where a large gathering was taking place when gunfire erupted. Six individuals sustained gunshot wounds, one fatally. Dymund Shields (B/M [REDACTED]) was among the victims and succumbed to his injuries, which the Jackson County Medical Examiner ruled a homicide.

Video surveillance from nearby businesses showed four vehicles parked near 7022 Prospect Avenue, Kansas City, Jackson County, Missouri. One of the occupants had waist-length dreadlocks and a beard. He was wearing a black shirt, black shorts, and black tennis shoes, with a dark object attached to his left ankle, which was believed to be an ankle monitor. Detectives with the Kansas City, Missouri Police Department Gang Intelligence Unit reviewed the video surveillance and advised the male in the video resembled **Derrion TURNER (B/M [REDACTED])**. Detectives learned **TURNER** was previously released from Federal custody and obtained GPS ankle monitor locations from the Bureau of Prisons. GPS data from **TURNER's** ankle monitor indicated he was in the vicinity at the time of the homicide.

Further review of the video surveillance showed **TURNER** and a group of people standing around their vehicles with visible firearms as another group of six males walked past, south on Prospect Avenue. As the group of males passed **TURNER's** group, one of the males turned around and stared at **TURNER's** group. **TURNER** produced a firearm and began shooting toward the other group, leading to a chaotic exchange of gunfire from multiple people attending the gathering that resulted in multiple injuries and one death.

After the shooting, video surveillance revealed everyone in the area fled the scene on foot and in vehicles. **TURNER** was seen entering the back seat of a red Hyundai Elantra, which fled north on Prospect Avenue after the shooting. A license plate reader captured the red Hyundai Elantra, bearing Missouri license plate [REDACTED] drive through the intersection of Meyer Boulevard and Prospect Avenue at 0152 hours, approximately one minute after the homicide. A computer check through the Missouri Department of Revenue shows the license plate is registered to a Dodge sedan and the registered owner as Derrion **TURNER**.

PROBABLE CAUSE STATEMENT FORM

CRN KC24060349

██████████ (Victim #1) stated his brother was having car problems and they pushed his vehicle from the street into the gas station (Xpress Mart located at 7300 Prospect Avenue, Kansas City, Jackson County, Missouri) parking lot. As he was walking back across the street, he heard what he thought was fireworks and realized he was shot. Foster stated he saw some individuals with guns but did not see anyone shooting. He could not describe any of the individuals who were armed other than to say they were African-American. He stated he didn't hear an argument prior to the shooting.

██████████ (Victim #2) stated she was at 6902 Prospect Avenue with her friends dancing and listening to music when she heard gunshots. She went to the ground and crawled to the front of the car and realized she was shot in the left arm and side. She was then transported to the hospital in her friend's vehicle. She stated she didn't see where the gunshots were coming from, but observed four young teenage males with facemasks walking around "clutching" what she believed were guns.

██████████ (Victim #3) stated he was across the street from the gas station when he heard gunshots and began to run. He was shot one time in the shoulder and ran to a nearby house and was transported to the hospital. He stated he did not see any of the shooters, but there were "bullets flying everywhere." He stated he did not hear arguing or a disturbance prior to the gunshots.

██████████ (Victim #6) stated she was with her cousin, ██████████, and they went to the area of Gregory Boulevard and Prospect Avenue, across from the gas station. They were standing by her mom's silver 2016 Chevy Equinox talking and listening to music when she heard gunfire and was shot. She got into the Equinox with ██████████ and was transported to the hospital by ██████████. She stated she didn't hear an altercation or see anyone with firearms before the gunfire started.

██████████ (Witness #1) stated his white GMC Yukon was parked across the street from the gas station while he was assisting a friend with jump-starting his car. He went to the gas station to purchase a drink, and upon exiting, he noticed four young black males near his truck. ██████████ stated he observed the males whispering and felt they were preparing to cause trouble. As he approached his truck, he heard gunshots and quickly fled the scene in his vehicle. He stated he witnessed the four young males and a young black female running westbound on Gregory Boulevard before entering a yard on Wabash Avenue. ██████████ stated his vehicle was struck by bullets multiple times and provided officers with bullet fragments he removed from the vehicle.

██████████ (Witness #4) stated she lives with her mother, ██████████ Victim #5), at ██████████, Kansas City, Jackson County, Missouri, and they were sleeping inside the residence when a bullet came through the north window and struck her nearly bedridden mother in the left arm. A tourniquet was applied to Brown's arm by officers and she was transported to an area hospital by EMS.

██████████ (Witness #3) stated she was with her friends and **TURNER** was with his friends that night and they went back and forth between Westport and "██████████" (referring to the area of E. 69th Street and Prospect Avenue and the 6 Lounge, located at 6902 Prospect Avenue, Kansas City, Missouri, previously named 6902 Club). At the time of the shooting, she stated she was on her way to the area of E. 69th Terrace and Prospect

PROBABLE CAUSE STATEMENT FORM

CRN KC24060349

Avenue and wasn't with **TURNER**. She stated she was on the phone with **TURNER** when he said "Run!" and the call disconnected. Smith stated after the shooting, she met **TURNER** near a lake at his apartment complex and he was acting normal. She stated **TURNER** told her some young guys in ski masks started shooting and then out of nowhere everyone started shooting. Smith denied seeing **TURNER** with a firearm that night and stated they were never in the same vehicle together.

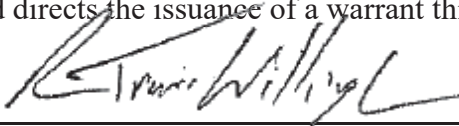
On 08/09/2024, **TURNER** was detained at the Bureau of Prisons in Leavenworth, Kansas, for failing to comply with his release requirements. On 08/09/2024, detectives responded to the Leavenworth Penitentiary located at 1300 Metropolitan Avenue, Leavenworth, Kansas to speak to **TURNER**. **TURNER** was read the Miranda Warning and agreed to provide a statement. **TURNER** stated on Sunday night (08/04/2024), between 2300 hours and 0000 hours, he met a female () and some of her friends at "Westport" (located in the Entertainment District in the area of 540 Westport Road, Kansas City, Missouri) and then went to the Daiquiris bar on "Vine" (identified as the Velvet Freeze Daiquiris located at 1827 Vine Street, Kansas City, Missouri). They left the Velvet Freeze Daiquiris and slowly drove through the area (the area of the homicide on Prospect Avenue) in () white Tesla, with the windows down, and talked to people as they were stopped in traffic. He stated they didn't stay at the location long because when they drove by, there were too many people with guns and he didn't feel comfortable. **TURNER** stated he later heard on the news there was a big party on Prospect Avenue, the past Sunday or two Sundays before, people started shooting and stated, "It's Kansas City and that's what people do." **TURNER** denied having any involvement in the shooting and denied possessing a firearm.

On 02/18/2016, the United States Attorney's Office, Western District of Missouri, convicted **TURNER** of receiving a firearm while under indictment. On 08/24/2023, the United States Marshal, District of Missouri, convicted **TURNER** of felon in possession of a firearm.

Printed Name Det. Alexis Vega #5528 Signature /s/Det. Alexis Vega #5528

06-Dec-2024

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



Judge

Circuit Court of _____ County, State of Missouri.