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

Police# 15-036967
Prosecutor# 095427278
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Dominque D. Marchbanks
3430 Norton Ave.
Kansas City, MO 64130
DOB: 10/23/1991; Race/Sex: B/M;
SS# [redacted]
Defendant.

Count I. Murder 1st Degree (565.020-001Y19840903.0)

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 May 31, 2015, in the County of Jackson, State of Missouri, the defendant after deliberation, either acting alone or purposely in concert with another, knowingly caused the death of [redacted] by shooting at a residence located at 6701 Walrond, Kansas City, MO; and,

Defendant is further given notice that should the state submit murder in the second degree - felony 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 B felony of unlawful use of a weapon under Section 571.030, RSMo, committed by defendant.

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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent (85%) of the sentence is served.

Count II. Armed Criminal Action (571.015-001Y19755213.0)

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 571.015, RSMo, committed **the felony of armed criminal action**, punishable upon conviction under Section 571.015.1, 571.015.2, and 571.015.3, RSMo, in that on or about May 31, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of murder in the first 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 first degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145213.0)

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 May 31, 2015, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a habitable structure located at 6701 Walrond, Kansas City, MO.

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. Violations of subdivision (9) of subsection 1 of this section (Section 571.030) shall be punished as follows: (1) For the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; (2) For any violation by a prior offender as defined in section 558.016, 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 years; (3) For any violation by a persistent offender as defined in section 558.016, 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; (4) For any violation which results in injury or death to another person, a person shall be sentenced to an authorized disposition for a class A felony.

Count IV. Armed Criminal Action (571.015-001Y19755213.0)

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The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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.

THE STATE OF MISSOURI

vs.

Dominque D. Marchbanks

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

James F. Stigall (#65391)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
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WITNESSES:
DET Bonita Y. Cannon , 1125 Locust, Kansas City, MO 64106
DET Garry J. Eastwood , 1125 Locust, Kansas City, MO 64106
[redacted]
SGT Richard D. Sharp , 1125 Locust, Kansas City, MO 64106
DET Nicholas A. Sola , 1125 Locust, Kansas City, MO 64106
[redacted]

PROBABLE CAUSE STATEMENT FORM

Date: 02-19-2016 CRN: 15-036967

I, Detective Bonita Cannon, #4585, 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 05-31-2015 (Date), at 6701 Walrond Avenue (Address) in

Kansas City, Jackson County (County) Missouri Dominque Marchbanks (Name of Offender(s))

B/M 10-23-1991 (Description of Identity) committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 05-31-2015 at 1008 hours, officers with the Kansas City Missouri Police Department were dispatched to 6701 Walrond Ave, Kansas City, Jackson County, Missouri in regard to multiple gunshots fired into a residence. A three year old male (Victim #1 (A.H.; DOB: [redacted]; Deceased)) was found deceased lying in his bed in the northeast bedroom of the address. At least ten shell casings were found outside 6701 Walrond and numerous bullet holes were observed entering 6701 Walrond.

On 01-30-2015, D'Shawn Marchbanks was shot and killed in Grandview, Jackson County, Missouri. SirTerry Stevenson (hereafter referred to as "Stevenson") was arrested following the shooting and questioned about the death of D'Shawn Marchbanks. Stevenson stated he was in the car with D'Shawn Marchbanks when a car started firing at them. Statements show that Stevenson fled the scene and hid two firearms. Statements also show that Dominque Marchbanks was in the car with D'Shawn Marchbanks and fled the scene when EMS arrived. The same evening of D'Shawn Marchbanks death, SirTerry Stevenson (hereafter referred to as "Stevenson") posted on Facebook under his user name "S Dot Hoe", comments that stated, "I'm a fucking kill everything watch" and "CUZ just died in front of mee". Information was received that the shooting on 05-31-2015 at 6701 Walrond was in retaliation for the homicide of D'Shawn Marchbanks.

A photograph of D'Shawn Marchbanks and Sulif Wilkins (hereafter referred to as "Wilkins") was located on Wilkins public Facebook page under his username "Tha boi-boi". A photograph of Stevenson and D'Shawn Marchbanks was located. The picture was under D'Shawn Marchbanks username – "Lumpy Marchbanks". In addition, a photograph of **Dominique Marchbanks** (BM 10-23-1991), D'Shawn Marchbanks, Stevenson, Desmond Moore, and Tarod Perkins together was obtained from facebook. **Dominique Marchbanks** is also relative of D'Shawn Marchbanks.

Victim #5 (M.M.; DOB: [redacted]) stated that Victim #6 (C.H.; DOB: [redacted]) and Witness #1 (R.P.; DOB: [redacted]) left 6701 Walrond late on 5-30-2105 and returned with Wilkins. Victim #1 (A.H.; DOB: [redacted]; Deceased), Victim #2 (B.H.; DOB: [redacted]), Victim #3 (J.H.; DOB: [redacted]), Victim #4 (R.W.; DOB: [redacted]), Victim #5 (M.M.; DOB: [redacted]),Victim #6 (C.H.; DOB: [redacted]), Victim #7 (L.H.; DOB: [redacted]), Witness #1 (R.P.; DOB: [redacted]), and Wilkins stayed the night at 6701 Walrond the night before the homicide.

Witness #1 (R.P.; DOB: [redacted]) stated Wilkins was acting weird the morning of the shooting. Wilkins was on the phone most of the morning, and at one point Wilkins asked Witness #1 (R.P.; DOB: [redacted]) to go look at the basement of the residence, which is below ground. While down in the basement Wilkins appeared to be stalling and asking about the furnace. Witness #1 (R.P.; DOB: [redacted]) stated he felt uncomfortable and left the basement. He then left the residence with Witness #2 (K.W.; DOB: [redacted]). Wilkins followed them to Witness #2's (K.W.; DOB: [redacted]) residence. Witness #1 (R.P.; DOB: [redacted]) stated he observed Wilkins on the phone and standing in the doorway of Witness #2's (K.W.; DOB: [redacted]) residence looking towards 6701 Walrond. While doing so Wilkins was on his cell phone and said something referencing a gold car just prior to gunshots being heard outside 6701 Walrond. Witness #1 (R.P.; DOB: [redacted]) stated Wilkins refused to respond to 6701 Walrond to assist the victims just following the shooting and left the scene in a grey Charger before Police could talk to him. Witness #1 (R.P.; DOB: [redacted]) stated that Wilkins came over to 6701 Walrond with Desmond Moore in a gold car a week before the homicide on May 31, 2015.

Information received from the phone records of Wilkins and Stevenson show communications between the two of them before, during, and after the approximate time of the homicide. The notable calls on the morning of the homicide occurred at 10:00 A.M, 10:04 A.M, 10:05 A.M and 10:10 A.M, and then 10:40 A.M and 11:10 A.M., specifically the call at 10:05 A.M. which lasts until 10:08 A.M. The call to police the morning of the homicide (05-30-2015) came in at 10:08 A.M.

Based on the phone records received from [redacted] (phone belonging to Stevenson), it was determined that the incoming call at 10:04 A.M and the outgoing call at 10:05 A.M., were placed and received hitting off a tower that was 5 blocks away from 6701 Walrond Ave. This would put Stevenson's phone in the area of 67th and Walrond Ave at the time of the Homicide. It should be noted that Wilkins' phone records indicate he was also in the area of 67th and Walrond Ave when making the phone calls hitting off the same tower as Stevenson, five blocks away.

On 06-01-2015 Stevenson sent a message to Wilkins stating "Fasho #lumpgang". On the same day Wilkins responded to Stevenson's text with "#lumpgang 4 life family".

Witness #3 (T.S.; DOB: [redacted]) stated on the morning of 05-31-2015, she was inside her bedroom looking out the window when she observed an older model gold four (4) door driving slowly east on 67th just past Walrond, with the front passenger door open. Just as the vehicle stopped east of Walrond, the front seat passenger leaned out of the vehicle with a long rifle and began shooting at 6701 Walrond. The witness described the shooter as being left handed because she could see the right arm extended holding the front of the rifle, and she could observe something on the right forearm, possibly tattoos or scars. The witness described hearing several shots and then observed the vehicle drive east on 67th street at a high rate of speed. The witness also stated she observed 2 other subjects in the vehicle, one in the driver's seat and one in the middle rear seat.

Witness #4 (P.W.; DOB: [redacted]) stated he was in his house and heard multiple gunshots coming from the rear of his house. When Witness#4 looked out the back door he observed a 1990's gold colored four (4) door vehicle with tinted windows fleeing eastbound on 67th St.

Both Witness #3 (T.S.; DOB: [redacted]) and Witness #4 (P.W.; DOB: [redacted]) were shown photographs of a gold colored 1998 Buick LeSabre with tinted windows. They both positively identified the photographs as the type of vehicle they observed on the morning of the shooting.

The homicide unit determined that a gold colored 1998 Buick LeSabre with tinted windows (bearing Missouri license plate number FL7-V5F) was registered to Cornelius Frye, TOD to Stevenson.

On 06-02-2015 a gold colored 1998 Buick LeSabre was observed at 3310 College, the license plate was confirmed to be FL7-V5F, and personnel from the Career Criminal Unit attempted to stop the above listed vehicle. The vehicle fled and a short pursuit was initiated. Stevenson wrecked the vehicle and was apprehended after fleeing on foot. During the apprehension of Stevenson his cell phone (816-456-0422) was recovered.

On 06-04-2015 in an attempt to locate the murder weapon ATF agents coordinated a buy of a rifle similar in appearance to one on Stevenson's cell phone. Tarod Perkins arrived at the predetermined location and produced an SKS rifle that was ultimately purchased by ATF.

On 06-08-2015 the Kansas City Missouri Regional Lab conducted a firearms examination on the Romarm SKS firearm purchased on 06-04-2015 and determined it to have fired the shell casings recovered at the scene of the homicide.

On 06-17-2015 Tarod Perkins was taken into custody and transported to Police Headquarters, 1125 Locust. Perkins admitted to buying an SKS from "Domo" (identified as **Dominique Marchbanks;** BM; 10-23-1991). Perkins denied knowledge of the homicide or the SKS being used in the homicide. Perkins stated he was at life guard classes on 05-31-2015 at the time of the homicide. Detectives called and confirmed that Perkins was at life guard classes at the time of the homicide. A search warrant was obtained of Perkins phone. During the search of his phone, a photograph of the purchased SKS was discovered. Based on a comparison of the photo recovered from Perkin's phone and a photo taken by the Kansas City Police Department of the backseat of Stevenson's gold Buick LeSabre, the photo recovered from Perkin's phone showing the SKS firearm appeared to be taken in the backseat of Stevenson's car. This photograph was confirmed to be the same photograph used to coordinate the buy of the SKS on 06-04-2015.

Stevenson was interviewed on several occasions. Stevenson stated he was with D'Shawn Marchbanks when D'Shawn Marchbanks was killed. He later heard and believed that "Bullet" (Marcellus Anderson) was responsible for the death of D'Shawn Marchbanks. Stevenson stated that on 05-30-2015 his friend's house, in the area of 80th and Paseo, was shot into. Stevenson stated he was with **Dominque Marchbanks** the night of 05-30-2015 when Wilkins called. Wilkins stated that the people who shot D'Shawn Marchbanks and shot into Stevenson's friend's house in the area of 80th and Paseo were at a house off 67th and Walrond bragging about the shootings. Wilkins told Stevenson to get over to the house and **Dominque Marchbanks** agreed they should go that night, but they did not go until the next morning. The morning of 05-31-2015 Stevenson drove himself and **Dominque Marchbanks** to the area of 67th and Walrond. Wilkins directed Stevenson and **Dominque Marchbanks** to 6701 Walrond. Stevenson said that **Dominque Marchbanks** was armed with the recovered Romarm SKS firearm matching the shell casings found at the scene. As they approached 6701 Walrond, **Dominque Marchbanks** fired into the house and they fled the scene.

Witness #5 stated he was housed the Jackson County Detention Center, with **Dominque Marchbanks**. Witness #5 stated **Dominque Marchbanks** admitted to Stevenson being his cousin and they communicated during the time, via a glass window, witness #5 stated he met **Dominque Marchbanks**. Witness #5 stated **Dominque Marchbanks** introduced himself as "A Killer" and "The muscle". Witness #5 stated he asked **Dominque Marchbanks** if he is the one who shot into the house and killed the victim, to which **Dominque Marchbanks** stated, "Yeah but don't say nothing". **Dominque Marchbanks** also admitted that Stevenson was driving the vehicle at the time of the shooting.

Witness #6 stated he was also housed in the Jackson County Detention Center housed with **Dominque Marchbanks.** During the time they were housed together, **Dominque Marchbanks** "bragged" about killing several people, and shooting someone just prior to his arrest. **Dominque Marchbanks** told witness #6 "I have an itchy finger". Witness #6 stated **Dominque Marchbanks** admitted to being the "Shooter", and Stevenson was the driver, when the victim was killed. Witness #6 stated **Dominque Marchbanks** told him the intended target was the victim's father because he killed D'Shawn Marchbanks.

Witness #7 stated he spoke with Stevenson while they were both housed at the Jackson County Detention Center. Witness #7 stated he asked Stevenson if he "killed the kid", to which Stevenson told him he was "driving the car with the wrong person who was mad" and the shooting was due to the D'Shawn Marchbanks murder. Witness #7 further stated he also had a conversation with **Dominque Marchbanks,** who admitted to witness #7 that he was the "shooter" during the time the victim was killed.

Dominque Marchbanks was escorted from the Jackson County Detention Center to Police Headquarters, concerning this case. **Dominque Marchbanks** was advised of his Miranda Rights via the Miranda Waiver at 1030 hours. **Dominque Marchbanks** agreed to speak with detectives. **Dominque Marchbanks** mostly hangs out with Stevenson and Moore. **Dominque Marchbanks** was shown a photo of the Romarm SKS firearm and he stated he doesn't know anything about the gun. **Dominque Marchbanks** denied ever shooting the firearm, but then stated he was wasn't going to "incriminate himself" and smiled when he was told this is in regard to a 3 year-old's homicide.

Dominque Marchbanks also stated that he was in the vehicle with Stevenson and D'Shawn Marchbanks (his cousin) when D'Shawn Marchbanks was killed. He stated he did not talk to police and left when EMS was arriving.

When asked again about the rifle, **Dominque Marchbanks** smiled and repeated that he wasn't going to incriminate himself. It is important to note that the Detectives interviewing **Dominque Marchbanks** observed him continuously smiling and looking at the photo of the firearm. **Dominque Marchbanks** informed Detectives that he knew Stevenson had told on him. He stated he will not talk about things on the phone because they are recorded and Stevenson had told him in jail that they were trying to give him forty (40) years for being the driver. When Detectives asked if Stevenson had told **Dominque Marchbanks** he was the driver, **Dominque Marchbanks** responded, "yes." Further into the conversation, **Dominque Marchbanks** again stated he did not care that a child was killed and the Detectives could not make him care. He went on to state that when Lumpy (D'Shawn Marchbanks) was killed, someone else dying is a result of karma. He then stated he doesn't give "two fucks" if a baby or old lady gets killed. **Dominque Marchbanks** continued to state that he did not "give a fuck" that a child or three year-old is dead. He also agreed that the term "psychopath" describes him. When asked why, **Dominque Marchbanks** referenced a post on his facebook page by saying that, "they told him not to do it I did it anyway."

Printed Name Det. Bonita Cannon, #4585 Signature _____

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

_____

Judge

Circuit Court of _____ County, State of Missouri.

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

Police# 15-036967
Prosecutor# 095430271
1616-CR
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COMPLAINT

STATE OF MISSOURI

vs.

Sulif I. Wilkins
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Kansas City, MO 64132
DOB: 11/02/1989; Race/Sex: B/M;
SS# [redacted]
Defendant.

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Defendant is further given notice that should the state submit murder in the second degree - felony 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 B felony of unlawful use of a weapon under Section 571.030, RSMo, committed by defendant.

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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent (85%) of the sentence is served.

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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. Violations of subdivision (9) of subsection 1 of this section (Section 571.030) shall be punished as follows: (1) For the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; (2) For any violation by a prior offender as defined in section 558.016, 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 years; (3) For any violation by a persistent offender as defined in section 558.016, 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; (4) For any violation which results in injury or death to another person, a person shall be sentenced to an authorized disposition for a class A felony.

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The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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.

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James F. Stigall (#65391)
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WITNESSES:
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SGT Richard D. Sharp , 1125 Locust, Kansas City, MO 64106
DET Nicholas A. Sola , 1125 Locust, Kansas City, MO 64106
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Date: 02-19-2016 CRN: 15-036967

I, Detective Bonita Cannon, #4585, 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 05-31-2015 (Date), at 6701 Walrond Avenue (Address) in

Kansas City, Jackson County (County) Missouri Sulif Wilkins (Name of Offender(s))

B/M 11-02-1989 (Description of Identity) committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 05-31-2015 at 1008 hours, officers with the Kansas City Missouri Police Department were dispatched to 6701 Walrond Ave, Kansas City, Jackson County, Missouri in regard to multiple gunshots fired into a residence. A three year old male (Victim #1 (A.H.; DOB: [redacted]; Deceased)) was found deceased lying in his bed in the northeast bedroom of the address. At least ten shell casings were found outside 6701 Walrond and numerous bullet holes were observed entering 6701 Walrond.

On 01-30-2015, D'Shawn Marchbanks was shot and killed in Grandview, Jackson County, Missouri. SirTerry Stevenson (hereafter referred to as "Stevenson") was arrested following the shooting and questioned about the death of D'Shawn Marchbanks. Stevenson stated he was in the car with D'Shawn Marchbanks when a car started firing at them. Statements show that Stevenson fled the scene and hid two firearms. Statements also show that Dominque Marchbanks was in the car with D'Shawn Marchbanks and fled the scene when EMS arrived. The same evening of D'Shawn Marchbanks death, SirTerry Stevenson (hereafter referred to as "Stevenson") posted on Facebook under his user name "S Dot Hoe", comments that stated, "I'm a fucking kill everything watch" and "CUZ just died in front of mee". Information was received that the shooting on 05-31-2015 at 6701 Walrond was in retaliation for the homicide of D'Shawn Marchbanks.

A photograph of D'Shawn Marchbanks and **Sulif Wilkins** (hereafter referred to as "**Wilkins**") was located on **Wilkins** public Facebook page under his username "Tha boi-boi". A photograph of Stevenson and D'Shawn Marchbanks was located. The picture was under D'Shawn Marchbanks username – "Lumpy Marchbanks". In addition, a photograph of Dominique Marchbanks, D'Shawn Marchbanks, Stevenson, Desmond Moore, and Tarod Perkins together was obtained from facebook. Dominique Marchbanks is also relative of D'Shawn Marchbanks.

M.M. was interviewed and stated that three or four days prior to the shooting that occurred on 05-31-2015, he was at 6701 Walrond talking about Victim #6 (C.H.; DOB: [redacted]) and Marcellus Anderson's possibly involvement in the homicide of D'Shawn Marchbanks. **Wilkins** was present while M.M. was talking about the shooting that occurred on 01-30-2015. They all learned after the shooting on 05-31-2015 that **Wilkins** is very close to Stevenson, Desmond Moore, and D'Shawn Marchbanks.

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Victim #5 (M.M.; DOB: [redacted]) stated that Victim #6 (C.H.; DOB: [redacted]) and Witness #1 (R.P.; DOB: [redacted]) left 6701 Walrond late on 5-30-2105 and returned with **Wilkins**. Victim #1 (A.H.; DOB: [redacted]; Deceased), Victim #2 (B.H.; DOB: [redacted]), Victim #3 (J.H.; DOB: [redacted]), Victim #4 (R.W.; DOB: [redacted]), Victim #5 (M.M.; DOB: [redacted]),Victim #6 (C.H.; DOB: [redacted]), Victim #7 (L.H.; DOB: [redacted]), Witness #1 (R.P.; DOB: [redacted]), and **Wilkins** stayed the night at 6701 Walrond the night before the homicide.

Witness #1 (R.P.; DOB: [redacted]) stated **Wilkins** was acting weird the morning of the shooting. **Wilkins** was on the phone most of the morning, and at one point **Wilkins** asked Witness #1 (R.P.; DOB: [redacted]) to go look at the basement of the residence, which is below ground. While down in the basement **Wilkins** was on the phone and asking about the furnace. Witness #1 (R.P.; DOB: [redacted]) felt uncomfortable in the basement and left the residence with Witness #2 (K.W.; DOB: [redacted]). **Wilkins** followed them to Witness #2's (K.W.; DOB: [redacted]) residence. Witness #1 (R.P.; DOB: [redacted]) stated he observed **Wilkins** on the phone and standing in the doorway of Witness #2's (K.W.; DOB: [redacted]) residence looking towards 6701 Walrond. **Wilkins** was on his cell phone and said something referencing a gold car just prior to gunshots being heard outside 6701 Walrond. Witness #1 (R.P.; DOB: [redacted]) stated **Wilkins** refused to respond to 6701 Walrond to assist the victims just following the shooting and left the scene in a grey Charger before Police could talk to him.

Information received from the phone records of **Wilkins** and Stevenson show communications between the two of them before, during, and after the approximate time of the homicide. The notable calls on the morning of the homicide occurred at 10:00 A.M, 10:04 A.M, 10:05 A.M and 10:10 A.M, and then 10:40 A.M and 11:10 A.M., specifically the call at 10:05 A.M. which lasts until 10:08 A.M. The call to police the morning of the homicide (05-31-2015) came in at 10:08 A.M.

Based on the phone records received from [redacted] (phone belonging to Stevenson), it was determined that the incoming call at 10:04 A.M and the outgoing call at 10:05 A.M., were placed and received hitting off a tower that was 5 blocks away from 6701 Walrond Ave. This would put Stevenson's phone in the area of 67th and Walrond Ave at the time of the Homicide.

It should be noted that **Wilkins'** phone records indicate he was also in the area of 67th and Walrond Ave when making the phone calls hitting off the same tower as Stevenson, five blocks away.

On 06-01-2015 Stevenson sent a text message to **Wilkins** stating "Fasho #lumpgang" On the same day **Wilkins** responded to Stevenson's text message with "#lumpgang 4 life family".

Witness #3 (T.S.; DOB: [redacted]) stated on the morning of 05-31-2015, she was inside her bedroom looking out the window when she observed an older model gold four (4) door driving slowly east on 67th just past Walrond, with the front passenger door open. Just as the vehicle stopped east of Walrond, the front seat passenger leaned out of the vehicle with a long rifle and began shooting at 6701 Walrond. The witness described the shooter as being left handed because she could see the right arm extended holding the front of the rifle, and she could observe something on the right forearm, possibly tattoos or scars. The witness described hearing several shots and then observed the vehicle drive east on 67th street at a high rate of speed.

Witness #4 (P.W.; DOB: [redacted]) stated he was in his house and heard multiple gunshots coming from the rear of his house. When Witness#4 looked out the back door he observed a 1990's gold colored four (4) door vehicle with tinted windows fleeing eastbound on 67th St.

Both Witness #3 (T.S.; DOB: [redacted]) and Witness #4 (P.W.; DOB: [redacted]) were shown photographs of a gold colored 1998 Buick LeSabre with tinted windows. They both positively identified the photographs as the type of vehicle they observed on the morning of the shooting.

The homicide unit determined that a gold colored 1998 Buick LeSabre with tinted windows (bearing Missouri license plate number FL7-V5F) was registered to Cornelius Frye, TOD to Stevenson.

On 06-02-2015 a gold colored 1998 Buick LeSabre was observed at 3310 College, the license plate was confirmed to be FL7-V5F, and personnel from the Career Criminal Unit attempted to stop the above listed vehicle. The vehicle fled and a short pursuit was initiated. Stevenson wrecked the vehicle and was apprehended after fleeing on foot. During the apprehension of Stevenson his cell phone [redacted] was recovered.

On 06-04-2015 in an attempt to locate the murder weapon ATF agents coordinated a buy of a rifle similar in appearance to one on Stevenson's cell phone. Tarod Perkins arrived at the predetermined location and produced an SKS rifle that was ultimately purchased by ATF.

On 06-08-2015 the Kansas City Missouri Regional Lab conducted a firearms examination on the Romarm SKS firearm purchased on 06-04-2015 and determined it to have fired the shell casings recovered at the scene of the homicide.

On 06-17-2015 Tarod Perkins was taken into custody and transported to Police Headquarters, 1125 Locust. Perkins admitted to buying an SKS from "Domo" (identified as Dominique Marchbanks BM[redacted]. Perkins denied knowledge of the homicide or the SKS being used in the homicide. Perkins stated he was at life guard classes on 05-31-2015 at the time of the homicide. Detectives called and confirmed that Perkins was at life guard classes at the time of the homicide.

A search warrant was obtained of Perkins phone. During the search of his phone, a photograph of the purchased SKS was discovered. Based on a comparison of the photo recovered from Perkin's phone and a photo taken by the Kansas City Police Department of the backseat of Stevenson's gold Buick LeSabre, the photo recovered from Perkin's phone showing the SKS firearm appeared to be taken in the backseat of Stevenson's car. This photograph was confirmed to be the same photograph used to coordinate the buy of the SKS on 06-04-2015.

Wilkins was advised of his Miranda Rights via the Miranda Waiver in regard to this investigation and agreed to be questioned. **Wilkins** denied any knowledge or involvement in the murder. **Wilkins** admitted to being picked up and staying the night at 6701 Walrond. **Wilkins** denied knowing Stevenson and D'Shawn Marchbanks. When confronted with the photo of him and D'Shawn Marchbanks, **Wilkins** stated that he knows D'Shawn Marchbanks as "L". **Wilkins** also denied having any communication with Stevenson prior to, during, or after the murder. When confronted with the text messages and call logs, **Wilkins** stated he didn't have his phone and explained the text messages with Stevenson as referencing, lumps of money.

Stevenson was interviewed on several occasions. Stevenson stated he was with D'Shawn Marchbanks when D'Shawn Marchbanks was killed. He later heard and believed that "Bullet" (Marcellus Anderson) was responsible for the death of D'Shawn Marchbanks. Stevenson stated that on 05-30-2015 his friend's house, in the area of 80th and Paseo, was shot into. Stevenson stated he was with Dominque Marchbanks the night of 05-30-2015 when **Wilkins** called. **Wilkins** stated that the people who shot D'Shawn Marchbanks and shot into Stevenson's friend's house in the area of 80th and Paseo were at a house off 67th and Walrond bragging about the shootings. **Wilkins** told Stevenson to get over to the house and Dominque Marchbanks agreed they should go that night, but they did not go until the next morning. The morning of 05-31-2015 Stevenson drove himself and Dominque Marchbanks to the area of 67th and Walrond. **Wilkins** directed Stevenson and Dominque Marchbanks to 6701 Walrond. Stevenson said that Dominque Marchbanks was armed with the recovered

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Romarm SKS firearm matching the shell casings found at the scene. As they approached 6701 Walrond, Dominque Marchbanks fired into the house and they fled the scene. Stevenson stated that **Wilkins** knew he was angry, **Wilkins** directed them to the house, they would not have been at the house without **Wilkins**, and it was implied what would happen.

Printed Name Det. Bonita Cannon, #4585 Signature _____

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

_____
Judge

Circuit Court of _____ County, State of Missouri.