

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

Police# 16-085408
Prosecutor# 095436216
1616-CR
OCN# B2106863

COMPLAINT

STATE OF MISSOURI

vs.

**Deandre M. Jackson
10509 E. 57th Terrace
Raytown, MO 64133
DOB: 12/01/1991; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 November 12, 2016, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Maryanna Pennington caused the death of Maryanna Pennington by shooting her.

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 (571.015-001Y19755213.0)

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 November 12, 2016, 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 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.

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 571.030.1(9), RSMo, committed the **Class A Felony of Unlawful Use of a Weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about November 12, 2016, at E. 21st St. and Cleveland Ave., in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a black Chevy Impala, and, as a result of the above-described conduct, Maryanna Pennington suffered injury or death.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

Count IV. 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 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 November 12, 2016, 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 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.

Count V. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 12, 2016, in the County of Jackson, State of Missouri, the defendant shot at Marsheanna Clark, and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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 VI. 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 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 November 12, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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.

Count VII. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 12, 2016, in the County of Jackson, State of Missouri, the defendant shot at [REDACTED] and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to Myesha Miller, and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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 VIII. 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 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 November 12, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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.

Count IX. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 12, 2016, in the County of Jackson, State of Missouri, the defendant shot at Chloe Donald and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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 X. 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 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 November 12, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count IX, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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 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.

Deandre M. Jackson

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

Daniel Nelson (#53885)
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WITNESSES:

DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106

[REDACTED]

DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106

DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106

DET Ray H. Lenoir, 1125 Locust, Kansas City, MO 64106

[REDACTED]

DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106

Maryanna Y. Pennington, Prosecuting Atty. Office, Kansas City, MO 64106

PO Terrell Watkins, 5301 E. 27th St., Kansas City, MO 64127

PROBABLE CAUSE STATEMENT FORM

Date: 11-14-2016

CRN: 16-85408

I, Detective Kristofer Oldham # 5166
(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 11-12-2016, at E. 21 St and Cleveland Av in
(Date) (Address)

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

B/M, 12-01-1991 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 11/12/2016, Kansas City Missouri Police Department officers were dispatched to 21st and Cleveland regarding a shooting. Upon arrival they observed a black Chevy Impala stopped in the street with the ignition on. Inside the vehicle were four female victims suffering from gunshot wounds. Three of the victims were transported to area hospitals where they are listed in critical condition. Victim #1, Maryanna Pennington, was deceased at the scene.

A patrol sergeant was rendering first aid to Victim #2, who was lying outside the vehicle. He asked her who had shot them. Victim #2 responded, "Day Day."

Scene investigation found the victims' vehicle had a broken front right axle. It was not drivable. Information was later obtained that the victims had called family members and told them the vehicle was broken down at 21st and Cleveland and they needed assistance. Detectives found approximately 32 spent shell casings from at least two different guns, around the victims' vehicle.

Detectives conducted an area canvas at the scene. They contacted several witnesses who had heard the sound of shots and then observed a white Chrysler driving from the area of the scene. One witness observed a white Chrysler driving away from the scene, identifying it specifically as a Chrysler 300.

Officers at the scene were contacted by a subject who identified themselves as a family member of one of the victims. That party advised they had received a telephone call from Victim #3 (back passenger seat occupant). Victim #3 told them, "I've been shot. I'm at 21st and Cleveland. Come quick!"

Another party who approached the officers at the scene identified herself as the mother of Victim #1 and Victim #2. She said she received a telephone call from her daughter saying she had a flat tire at 21st and Cleveland and needed her help. The party pointed to the victim's vehicle and stated, "That's her car, right there." She then stated, "Day Day did this." explaining that her daughter and "Day Day" have been "getting' into it all day." She told the officer that "Day Day's" real name was DeAndre Jackson.

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On 11-12-2016, detectives responded to an area hospital and contacted Victim #3 who had been shot multiple times. Victim #3 was getting ready to be taken to surgery. Victim #3 advised that she was inside a vehicle with three of her friends when they got a flat tire along Cleveland Ave. While they were waiting for family to come and help them. A black male approached the vehicle and began looking in the windows. She then observed a different black male, whom she knew as "Day Day," open up the front passenger door of their vehicle. "Day Day" began pulling Victim #2 out of the vehicle, and then he began shooting into the vehicle.

Victim #3 stated Day Day is the twin brother of "Mark Jackson who was dead." She further stated that Day Day has a baby with a [REDACTED] and he has the same last name as his brother, Mark Jackson.

Police databases revealed Mark Jackson, B/M, 12-05-1990, was a homicide victim in 2013 (13-085503). While reviewing the case file, we noted an interview on Supp. #26 of Deandre Jackson, B/M, 12-01-1991. Deandre advised detectives he was Mark Jackson's brother. In the same statement he told detectives that his girlfriend is [REDACTED] B/F, 09-24-1992.

On 11-14-2016, at approximately 1213 hrs, detectives responded back to the hospital and contacted Victim #3. The victim was presented with a photo line-up consisting of five black males of like description. Deandre Jackson, B/M, 12-01-1991, was placed in the number three position. Victim #3 picked up photo number three and stated, "This is him right here; that's Day Day for sure." She was again asked if this was the person who shot her and she confirmed by saying, "I'm positive."

Victim #3 further stated that the deceased victim, Maryanna Pennington, had been in an altercation with [REDACTED] on 11/11/2016 (Assault Rpt 16-85162). Pennington and [REDACTED] physically fought each other while inside [REDACTED] vehicle, while the vehicle was moving. While the two fought, [REDACTED] vehicle struck two parked cars (Vehicular Rpt 16-85150).

Victim #3 advised that she has known [REDACTED] since middle school. Victim #3 stated that just before Deandre Jackson began shooting, she heard [REDACTED]'s voice stating, "That's them, that's Pretty right there!" It should be noted that the victim, Maryanna Pennington, went by the nickname of "Pretty." Detectives produced a single photo of [REDACTED] B/F, 09-24-92. Victim #3 advised that this was same female that she knows as [REDACTED].

On 11/14/2016, Kansas City, MO police officers were looking for Deandre Jackson and had responded to the area of 7911 N Hickory, Kansas City, Clay County, MO after obtaining information that [REDACTED] was living in that apartment complex. They observed a White Chrysler 300 parked in the apartment parking lot.


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The vehicle was observed to have a CK4 S2F Missouri license that responded to Deandre Jackson. The vehicle had a sticker on the window dated 11/13/2016 that appeared to be a notice from the apartment complex.

While watching the residence, officers observed a maroon Nissan Altima pull into the parking lot by 7911 Hickory. They could not see who entered or exited the building or vehicle, but a few minutes later the same vehicle exited the lot and the officers were able to identify the occupants as Deandre Jackson and [REDACTED]. The vehicle was stopped and both parties were taken into custody. Upon interrogation, both parties invoked their right to remain silent.

On 11/14/2016, detectives responded to the apartment at 7911 N. Hickory and contacted neighbors. The neighbors identified a picture of [REDACTED] and said that she was living in Apartment #8. The neighbors were also shown a picture of Jackson. They identified him as often frequenting Apartment #8 and stated that he drove a White Chrysler 300.

Printed Name Detective Kristofer Oldham # 5166 Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.