

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

<b>POLICE NO. :</b>	17-48355
<b>PROSECUTOR NO. :</b>	095439645

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>DONNELL ALLEN</b>	)	
<b>3022 E. 49th Street, Apt. #2N,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64130</b>	)	<b>DIVISION</b>
<b>DOB: 09/03/1974</b>	)	
<b>Race/Sex: B/M;</b>	)	
<b>SSN: XXX-XX-4988</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2nd Degree (565.021-001Y19840912.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the Class A Felony of Murder in the Second Degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about May 27, 2017, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Ali Griffin, caused the death of Ali Griffin by striking him with a knife.

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 (571.015-001Y19755299.0)**

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 May 27, 2017, 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

**State vs. Donnell Allen**

defendant committed the foregoing felony of Murder in the Second Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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 Possession of a Firearm (571.070-001Y20175212.0)**

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 558.002 and 558.011, RSMo, in that on or about May 27, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed a single shot, break action style shotgun, a firearm, and

On August 23, 1994 the defendant was convicted of the felony offense of Trafficking in Drugs in the Second Degree, Case Number 05CR05940436-01 in the 5th Circuit Court of Buchanan County, Missouri, and

On September 25, 2003 the defendant was convicted of the felony offense of Possession of a Controlled Substance, Case Number 16CR03000131-01, in the 16th Circuit Court of Jackson County, Missouri, and

On September 25, 2003 the defendant was convicted of the felony offense of Unlawful Use of a Weapon, Case Number 16CR03003439-01, in the 16th Circuit Court of Jackson County, Missouri, and

On June 30, 2009 the defendant was convicted of the felony offense of Possession of a Controlled Substance, Case Number 0816-CR06589-01, in the 16th Circuit Court of Jackson County, 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 two (2) years 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 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.



**PROBABLE CAUSE STATEMENT FORM**

Date: 05-28-2017.

CRN: 17-48355

I, Detective Mark A. Slater #5206 Kansas City Missouri Police Department, Homicide Unit  
(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 05-27-2017, at 3018 E. 49<sup>th</sup> Street Apt #2S in  
(Date) (Address)

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

B/M, DOB: 09/03/1974, SSN [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 5/27/17 at approximately 1409 hours members of the Kansas City Missouri Police Department were dispatched to 3018 E 49th St. 2S, Kansas City, Jackson County, Missouri, Swope Plaza Apartments, in regard to a cutting. Upon arrival, officers observed apparent blood leading from the sidewalk leading the entry area of 3018 E 49th St. 2S, up the stairwell to the second floor and leading into the actual apartment clearly labeled "2S" on the front of the door on the south side of the second floor hallway.

Officers entered Apt. 2S and located an adult black male (the victim) lying on the kitchen floor of the apartment with an apparent injury to his leg, and was observed to be bleeding from the injury. EMS responded and pronounced him deceased at the scene. The death is being investigated as a homicide.

A witness, who was visiting the victim and was present when officers arrived on scene, advised officers the victim, had returned to the apartment bleeding from the leg after he had left briefly. Upon entering the apartment, the victim declared "Donnell" had stabbed him in the leg before he collapsed on the kitchen floor. The witness further stated that on 05/26/17 he made contact with "Donnell" at 3022 E. 49<sup>th</sup> Apt #2N. The witness stated that Donnell was highly agitated and produced a shotgun and attempted to strike the witness with the shotgun. The witness was transported to police headquarters where he provided a formal statement. The witness positively identified "Donnell" from a photographic line-up as **Donnell Allen b/m 09/03/1974** the individual that assaulted him the day before the homicide and the individual that the victim was referring to when he said that Donnell stabbed him.

"Donnell" was subsequently determined to reside in the same brick apartment structure, but with a different common entrance door. **Donnell Allen, b/m, 9/3/74**, who resides at 3022 E 49th St Apt. 2N, Kansas City, Jackson County, Missouri, surrendered to members of the Kansas City Police Department from 3022 E 49th St. Apt. 2N at 1526 hours after an Operation 100 had been initiated on 5/27/17 in response to the assault against the victim associated at 3018 E. 49th St. Apt #2S.

At the same time that **Allen** surrendered to members of the Kansas City Missouri Police Department, an additional witness was contacted who was also in the apartment with **Allen** at the time of his arrest. The witness was transported to the KCMO Police command post. Detectives made contact with the witness at the command post and asked if she would provide a statement in regard to the events that transpired prior to and after law enforcement's arrival. The witness stated

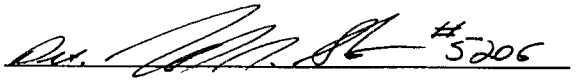
PROBABLE CAUSE STATEMENT FORM

CRN 17-48355

that on 05-27-2017 at approximately 1400 hours, she was asleep in 3022 E. 49<sup>th</sup> St. Apt #2N and was awakened by Allen. The witness stated that Allen had a knife in his left hand and was cleaning it in the kitchen sink. The witness inquired as to what had happened and Allen stated, "I stabbed the fuck out of that nigga." The witness then explained that Allen had been in an altercation with the victim the day prior (05-26-17) and the witness believed that Allen was just waiting for an opportunity to kill the victim. The witness stated that Allen is crazy and extremely violent and further stated that Allen has been diagnosed as schizophrenic but, does not take his medication. The witness stated that she asked how many times Allen stabbed the victim and stated that they needed to call the police. The witness stated that Allen informed her that he thought he stabbed the victim several times including once in the chest. The witness stated that Allen became agitated at the prospect of calling police or emergency services. The witness stated that she was afraid for her own safety at Allen's hands and at one point locked herself in the bathroom. The witness stated that after the stabbing but, prior to the arrival of police Allen was taunting the victim's family members from an open window in his apartment. The witness stated that Allen had the knife in one hand and a shotgun in the other. Ultimately, the witness was able to get Allen to surrender to law enforcement.

On 05-27-2017 at 1922 hours, detectives made contact with Allen and transported him to police headquarters. Allen was escorted to the 7<sup>th</sup> floor and placed in interview room #4. Allen was advised of his offered food and water and allowed access to restroom facilities. Allen was advised of his Miranda Rights by detectives. While detectives were advising Allen of his rights under the Miranda, Allen stated that he did not know what happened and that he did not remember what happened. Allen then invoked his right to an attorney but, made a spontaneous statement that the victim stabbed himself and that the victim killed himself by putting himself in conflict with Allen and that the victim, "should not have fucked with him." It should be noted that detectives never informed Allen of the nature of the victim's injuries. A criminal background check was conducted on Allen. The background check revealed Allen to be a convicted felon for narcotics possession, distribution, and unlawful use of a weapon.

Detectives applied for and obtained a search warrant for both the victim's and Allen's apartment from a Jackson County Missouri Judge. Detectives located several knives as well as a shotgun in Allen's apartment. The shotgun discovered by detectives matched the description provided by witness #1 that was used by Allen to assault him on the day prior to the homicide. The shotgun located by detectives appeared to be a single shot; break action style shotgun which was missing the butt stock and had been concealed in a trash can in Allen's apartment. Additionally, detectives and crime scene investigators were able to determine a presumptive positive test for blood around the kitchen sink where witness #2 described Allen cleaning the knife he used to stab the victim. The victim was determined to have injuries consistent with sharp force trauma.

Printed Name Detective Mark Slater Signature  #5206

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.