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

POL	ICE NO.:	17-10567	76	
PROSECUT	OR NO.:	09544291	14	
STATE OF MISSOURI,		)		
,	PLAIN	TIFF,		
vs.		)		
MALIK S. CHAPPLE		)		
1502 EAst 97th Street, #C		)	<b>CASE NO.</b> 1716	-CR
Kansas City, MO - 64114		)	DIVISION	
DOB: 02/13/1996		)		
Race/Sex: B/M;		)		
SSN: XXX-XX-		)		
<del></del>	DEFENI	DANT. )		

## **COMPLAINT**

Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 December 18, 2017, in the County of Jackson, State of Missouri, T.M. was killed by being shot as a result of the perpetration of the class A felony of Robbery in the First Degree under Section 570.023, RSMo committed by the defendant on or about December 18, 2017, in the County of Jackson, State of Missouri.

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 December 18, 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

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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. Robbery - 1st Degree (570.023-001Y20171207.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 18, 2017, in the County of Jackson, State of Missouri, the defendant or another forcibly stole marijuana in the possession of T.M. and in the course thereof defendant was armed with a deadly weapon.

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 (571.015-001Y19755299.)

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 December 18, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery 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 V. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20173899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class D felony of endangering the welfare of a child in the first degree,

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punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 18, 2017, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body or health of M.C.Jr. (DOB 05/07/15), a child less than seventeen years of age, by having M.C.Jr in close proximity to the defendant when defendant pointed and fired a firearm.

The range of 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.

#### JEAN PETERS BAKER

Prosecuting Attorney Jackson County, Missouri by,

/s/ Nichole Erickson
Nichole Erickson (#52086)
Assistant Prosecuting Attorney
415 E. 12th Street, 11th Fl
Kansas City, MO - 64106
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#### **WITNESSES:**

Malik Jr. S. Chapple, Prosecuting Atty. Office, Kansas City, MO - 64106 DET Scott M. Emery, 1125 Locust, Kansas City, MO - 64106 DET Thomas M. Hammond, 1125 Locust, Kansas City, MO - 64106 PO Rajdeep S. Khakh, 1125 Locust, Kansas City, MO - 64106 PO Luke T. Little, 1125 Locust, Kansas City, MO - 64106 Travis D. Mills, Prosecuting Atty. Office, Kansas City, MO - 64106 DET Scott P. Mullen, 1125 Locust, Kansas City, MO - 64106 DET Hobart D. Price, 1125 Locust, Kansas City, MO - 64106 DET Brent R. Taney, 1125 Locust, Kansas City, MO - 64106

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DET Daniel G. Thomas , 1125 Locust, Kansas City, MO - 64106

### PROBABLE CAUSE STATEMENT FORM

Date: 12-19-2017		CRN: <u>17-105676</u>			
I, Det. Scott Emery #4161					
(Name and identify law enforcement officer	, or person havin	g information as	probable cause.)		
knowing that false statements on this for	m are punisha	ble by law, sta	ate that the facts contained h	erein are true.	
I have probable cause to believe that on	12-18-2017 (Date)		1500 East 97 <sup>th</sup> Street (Address)	in	
Kansas City, Jackson (County)	Missouri M	Ialik S. Chapp	(Name of Offender(s))		
B/M 02-13-1996, 5'10" 185 pounds		0.07		1 66 ()	
(Description of Identity	<i>/</i> )	cor	nmitted one or more crimina	u offense(s).	

# Murder, ACA, Robbery, Child Endangerment

The facts supporting this belief are as follows:

Date: 12-19-2017

On 12-18-2017 at 1421 hours, Officer of the Kansas City Missouri Police Department were dispatched to 1500 East 97<sup>th</sup> Street regarding a shooting. Located at that address are apartments and a parking lot for the apartments.

Upon arrival the Officer located the listed Victim who was suffering from a gunshot wound. The Victim was transported to a local hospital where he succumbed to his wounds.

Detectives interviewed the listed Witness who explained the following: she has been purchasing weed from the listed suspect for about the last nine months. She knows him as Le-Le and communicates with him via cellular phone number 816-679-7545. The Victim had just returned from Colorado and needed money. While in Colorado he purchased \$750 dollars' worth of marijuana, they decided to sell the marijuana to Le-Le. Le-Le agreed to purchase the marijuana and they were going to meet at the apartments where the shooting occurred.

The Witness advised she and Victim parked Victim's vehicle in the parking lot at 1500 E. 97th St. Le-Le was in a vehicle she had seen him in before and he backed that vehicle into a parking spot next to Victim's vehicle where the passenger sides were next to each other. She observed a black male in the front passenger seat of Le-Le's vehicle as well as Le-Le's child in a car seat in the back seat. Le-Le got into the back passenger seat of the Victim's vehicle. Le-Le said he wanted to weigh the weed and went back to his car. When Le-Le returned to Victim's vehicle he had a gun in his hand. At the same time the passenger from the suspect's vehicle approached the driver's side of the Victim's vehicle. The Victim and the suspect's passenger struggled and Le-Le shot the Victim. At that time, the Witness had the weed and Le-Le pointed the gun at her and demanded the weed. She gave the weed to Le-Le and he and the passenger both left the scene in the suspect's vehicle.

The detective's conducted a computer search of the Le-Le's phone number which responded back to Malik S. Chapple B/M, 02-13-1996. The reporting detective showed the Witness a photographic line-up containing Malik Chapple and five fillers. The Witness immediately identified Chapple as the suspect who had shot the Victim.

### PROBABLE CAUSE STATEMENT FORM

CRN <u>17-105676</u>	_
The Jackson County Medical Examiner advised the Victim's death would be ruled a murder.	
The suckson County Wedlear Examiner advised the Victim's death would be fulled a murder.	
Printed Name Det. Scott Emery #4161 Signature Det. July 1/16/	/
The Court finds probable cause and directs the issuance of a warrant this day of	
Judge	
Circuit Court of County, State of Missouri.	