

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

POLICE NO. :	17-100465
PROSECUTOR NO. :	095443110

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
MALLIEK D. HAYNES)	
1101 Admiral Blvd #B,)	CASE NO. 1816-CR
Kansas City, MO - 64106)	DIVISION
DOB: 04/02/1993)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
)	DEFENDANT.

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840904.0)

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 on or about November 28, 2017, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Alton Hughes by stabbing him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

Count II. Armed Criminal Action (571.015-001Y19755212.0)

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 28, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant

State vs. Malliek D. Haynes

[REDACTED]

DET James H. Price , 1125 Locust, Kansas City, MO - 64106

DET Timothy R. Taylor , 1125 Locust, Kansas City, MO - 64106

DET Nathan S. VanVickle , 1125 Locust, Kansas City, MO - 64106

PO Brandon E. Walker , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01/03/2018

CRN: 17-100465

I, Detective James Price #5480 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 11/28/2017, at Independence Ave and Woodland Ave in
(Date) (Address)

Kansas City, Jackson Missouri Malliek D. Haynes
(County) (Name of Offender(s))

B/M 04/02/1993; SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 11/28/2017 at approximately 1500 hours Officers of the Kansas City, Missouri Police Department were dispatched to Independence Ave and Woodland Ave, Kansas City, Jackson County, Missouri in regard to a party down in the intersection. Upon arrival, officers located the victim on the northeast corner of Independence Ave and Woodland Ave with what appeared to be a large puncture wound to his chest. KCFD EMS personnel responded and pronounced the victim deceased.

Witness #1 stated he and his girlfriend were on the Metro Bus traveling westbound on Independence Ave. As the bus approached Woodland Ave, people on the right side of the bus began to "freak out a little bit" stating "they are fighting". Witness #1 looked out of the window and observed the suspect, later identified as **Malliek D. Haynes B/M 04/02/1993**, push the victim to the ground. He believed **Haynes** and the victim were just fighting, until his girlfriend told him **Haynes** was armed with a knife. Witness #1 observed **Haynes** stand over the victim and motion like he was punching the victim. When **Haynes** stood back up and turned away from the victim, witness #1 observed **Haynes** fold a knife and place it in the left front breast pocket of his jacket. Witness #1 then looked back at the victim and stated every time the victim would breathe, blood poured out of his "solar plex" area. Witness #1 eventually exited the bus and responded back to the scene to contact officers and provide a statement. Witness #1 described the suspect as a black male, between 25 and 30, wearing a black jacket, black cap with ear flaps and unknown colored pants.

Witness #2 stated she and her boyfriend were riding on the Metro Bus traveling westbound on Independence Ave. The bus stopped at Woodland Ave, at which time she observed two black males arguing on the curb. The victim appeared to fall off of the curb and into the street. While the victim was crawling backwards, **Haynes** approached the victim and stood over him. **Haynes** then drew his hand back and although witness #2 did not see a weapon, she stated "obviously the way he was acting, he had a knife". Witness #2 then observed **Haynes** "come at him" (victim) right in the chest. **Haynes** then stood over the victim for "a good three to four seconds, almost like he wanted to watch him die". Witness #2 eventually exited the bus and responded back to the scene to contact officers and provide a statement. Witness #2 described the suspect as a dark skin black male, with short afro style hair, wearing a black sweatshirt.

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Witness #3 stated she was in her vehicle traveling westbound, stopped for the red light at Independence Ave and Woodland Ave. She observed the victim fall to the ground, **Haynes** leaned over the victim and stabbed him with a dull black in color, folding knife. **Haynes** then began walking away eastbound, but turned around and walked back towards the victim. Witness #3 could tell **Haynes** was saying something to the victim, but could not hear what he was saying, due to her windows being rolled up. Witness #3 described the suspect as a dark skinned black male in his early to mid 20's. He was average sized and was wearing black pants and a hooded zipped jacket with "Nike" written on the front, in red.

Witness #4 stated he spoke with the victim earlier in the day and planned to pick him up at the BP gas station located at 1900 Independence Ave. He arrived at the BP and parked at the gas pumps. Parked next to him was a female that he recognized. She entered his vehicle and they started talking. **Haynes** approached his vehicle and stood at the driver side window talking with witness #4. **Haynes** suddenly stopped talking and "took off". Witness #4 looked towards the area **Haynes** was walking to and observed the victim approaching BP. **Haynes** immediately confronted the victim and began chasing him. The two continued "squaring off" into the middle of Independence Ave. As **Haynes** chased the victim westbound, witness #4 observed a crowd of people slowly moving westbound as well. At that point, witness #4 exited his vehicle and began walking westbound toward Woodland Ave. As he was walking toward the victim, **Haynes** passed witness #4 and stated something to the effect of, somebody better call 911 before he die. Witness #4 continued to the corner of Independence Ave and Woodland Ave, where he observed the victim lying in the street with "no breath in his body". Witness #4 described the suspect as a black male with a small afro, wearing a black zip up sweatshirt, with what appeared to be a white "Nike" sweater underneath. Witness #4 stated he believes he has seen the suspect around the BP before, but does not know his name.

Witness #5 stated she observed the victim and **Haynes** at the BP gas station. When she first saw them she believed they were "horse fighting". She was speaking with a friend who then stated it appeared they were really fighting. The victim and **Haynes** left the BP parking lot and moved into the street, between "Subway and the college". Witness #5 was unsure when **Haynes** stabbed the victim. Witness #5 described the suspect as a black male, wearing a black hoodie with a yellow "Nike" on the front. The suspect left the area eastbound on Independence Bl.

Witness #6 stated he was crossing through the BP parking lot, on his way to CVS when he first had contact with **Haynes**. They spoke briefly and witness #6 continued on his way. As he was walking back toward the BP, **Haynes** approached him again and they began talking. Witness #6 and **Haynes** then entered the BP. Upon exiting, **Haynes** approached a silver vehicle and began speaking with the occupants. **Haynes** then suddenly left the vehicle and began walking toward the victim at which time an altercation ensued. Witness #6 observed **Haynes** chase the victim down to Independence Ave and Woodland Ave; however, witness #6 stayed at the corner of Independence Ave and Maple and did not see what occurred. **Haynes** then walked back toward witness #6 and they both walked northbound on Maple. **Haynes** then began running and turned westbound on Missouri Ave.

Witness #6 stated he does not know the suspects real name, but has seen him several times around the BP and knows the suspect goes by "Kid". Witness #6 was presented a photo line-up and positively identified **Haynes** as the person he saw fighting the victim.

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During the course of the investigation surveillance video was located and obtained from BP gas station (1900 Independence Ave), an ATA bus (stopped at Independence Ave and Woodland Ave.) and Century Towers (612 Garfield Ave). Review of the BP surveillance video revealed the suspect wearing a dark colored hoodie with "Nike" written in yellow, on the front, light colored scarf and light shoes with black on the bottom. **Haynes** was seen several times throughout the video both inside the convenience store, as well as, in the parking lot. He is viewed making contact with a black male, later identified as witness #6. The video showed the victim exiting a maroon vehicle that stopped at Independence Ave. and Maple. He then walked toward the BP parking lot, at which time; **Haynes** approached the victim and immediately began attempting to fight the victim. **Haynes** chased the victim into the street and then westbound on the north side walk of Independence Ave. where they eventually exit the view of the camera. A short time later, **Haynes** re-appears walking eastbound toward the BP. He met back up with witness #6 and they both walk northbound on Maple and out of the view of the camera.

Video from the ATA bus showed it traveling westbound on Independence Ave approaching Maple, passing in front of the BP where the altercation began. As the bus continued westbound the victim and **Haynes** are both seen. The victim is walking backwards with **Haynes** following him. The bus stopped for the red light at Independence Ave and Woodland Ave. The victim is observed falling into the street, while avoiding being struck by an object in **Hayne's** hand. The victim began scooting himself away from **Haynes**, who then leaned over the victim for a few seconds. **Haynes** turned away and walked eastbound from the victim, still lying in the street. As the bus passed the victim, he did not appear to be moving. There appeared to be a stain on the front of the victim's shirt, which was not seen prior to the victim falling into the street. The suspect was observed wearing a dark colored hoodie, a light colored scarf, dark colored pants and white tennis shoes.

The Century Towers video showed **Haynes** in the general area of the BP parking lot. He entered the store for a brief period of time and upon exiting, walked to a silver colored SUV and is observed speaking with the occupants. A maroon vehicle traveling westbound on Independence Ave . stopped at the corner of Independence Ave and Maple. The victim exited that vehicle and walked toward the BP parking lot. **Haynes** approached the victim and an altercation ensued. The victim continued to walk backward, westbound, with **Haynes** chasing and swinging at him. The two exit the view of the camera to the west. **Haynes** re-entered the camera view, from the west and walked northbound on Maple.

Information was disseminated to patrol officers, regarding possible suspects. Officers were able to obtain the Facebook names of both **Haynes** and the party he was seen in surveillance video with (witness #6). After reviewing those Facebook accounts and searching several police databases, **Haynes** photo was determined to match both the Facebook account photos, as well as, still photos from the BP surveillance video. His photo was placed in a line-up and later positively identified by witness #6.

On 01/02/2018 officers received information that **Haynes** was driving a white Kia Optima and was possibly staying at a residence near 37th St. and Myrtle Ave. While conducting an area canvass, officers located a stolen, white Kia Optima parked in the driveway of 3724 Myrtle Ave. While conducting surveillance on this vehicle, officers observed it leave the residence and go to the area of 39th St. and Indiana Ave. Officers identified the driver and sole occupant of the vehicle as **Haynes'** girlfriend. She drove back to the residence and parked in the driveway.

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After several hours of surveillance, officers surrounded 3724 Myrtle and attempted to make contact with parties inside. No one would open the door; however, contact was made with the home owner and **Haynes'** girlfriend. While speaking with the two parties, the homeowner stated that he wanted to open the door but others inside would not allow him to. An Operation 100 was called and tactical units responded. After several hours of negotiations, all parties exited the residence and were taken into custody without incident.

Haynes was transported to Police Headquarters and escorted to an interview room. He was read his Miranda Rights aloud and asked if he wished to speak with detectives. He stated he did not and the interview was concluded.

Prior to being transported to HQ officers conducted a search of **Haynes**. Located in his pant pocket was one live .45 caliber round of ammunition. A computer check revealed **Haynes** to have a conviction through the Jackson County Missouri Circuit Court, on 11/17/2010, case number 1016CR0353401, for 2nd Degree Robbery, a Class B Felony for which he received an SIS and 3 years probation. On 03/29/2012 **Haynes'** probation was revoked and he was sentenced to 5 years confinement. A second conviction was also found through the Jackson County Missouri Circuit Court, on 03/28/2012, case number 1116CR0349901 for Unlawful Use of a Weapon, a Class D Felony, for which he received a sentence of 3 years confinement.

Printed Name Det. James Price #5480 Signature Det J Price #5480

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

Judge

Circuit Court of _____ County, State of Missouri.