

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

<b>POLICE NO. :</b>	18-017445
<b>PROSECUTOR NO. :</b>	095444216
<b>OCN:</b>	HQ000428

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>SHAWN M. BROWN</b>	)	
<b>1603 Lawn Ave.</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64127</b>	)	<b>DIVISION</b>
<b>DOB: 08/15/1990</b>	)	
<b>Race/Sex: W/M</b>	)	
<b>████████████████████</b>	)	
	<b>DEFENDANT.</b>	)

**COMPLAINT**

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim  
(565.050-001Y19841399.0)**

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 assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about March 6, 2018, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, attempted to cause serious physical injury to ██████████ by shooting at ██████████, a law enforcement officer in the performance of his official duties and special victim as defined by Section 565.002.

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. 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.

**State vs. Shawn M. Brown**

**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 March 6, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree as charged in Count I, all allegations of which are incorporated here by reference, and the defendant, acting alone or purposefully in concert with another, 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. 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. Discharge/shoot Firearm At Or From Motor Vehicle/shoot At Person,  
Another Motor Vehicle, Or Building/habitable Structure- Persistent Offender  
(571.030-001Y20035299.0)**

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 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 March 6, 2018, at 2506 Chelsea Ave., in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, knowingly shot a firearm from four door Buick sedan , a motor vehicle.

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. However, the sentence for violating section 571.030.1(9) shall the maximum for a B felony, which is fifteen (15) years in the Missouri Department of Corrections .

**State vs. Shawn M. Brown**

**Count IV. 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 March 6, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon as charged in Count III, all allegations of which are incorporated here by reference, and the defendant, acting alone or purposefully in concert with another, 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. 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 V. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20174899.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting an arrest**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 6, 2018, in the County of Jackson, State of Missouri, law enforcement officers were making an arrest of defendant for assault and unlawful use of a weapon, and the defendant knew or reasonably should have known that the officers were making an arrest, and, for the purpose of preventing the officers from effecting the arrest, resisted the arrest of defendant by fleeing from the officers , and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant fled in a motor vehicle at a high rate of speed, crashed the vehicle, and continued to flee on foot, and either he or another participant in the crime was armed with a deadly weapon upon fleeing.

The range of punishment for a class E 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 four (4) 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.

**State vs. Shawn M. Brown**

**Count VI. 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 March 6, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Resisting Arrest as charged in Count V, all allegations of which are incorporated here by reference, and the defendant, acting alone or purposefully in concert with another, committed the foregoing felony of Resisting Arrest 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. 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.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ P. Benjamin Cox  
P. Benjamin Cox (#60757)  
Assistant Prosecuting Attorney  
415 E. 12th St., Fl 7M  
Kansas City, MO 64106  
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BCox@jacksongov.org

**State vs. Shawn M. Brown**

**WITNESSES:**

DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106  
DET Brandon J. Bray, 5301 E. 27th St., Kansas City, MO 64128  
DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127  
DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106  
SGT Eric J. Roeder, 1125 Locust, Kansas City, MO 64106  
DET Mark A. Slater, 1125 Locust, Kansas City, MO 64106  
DET Christopher S. Smith,  
DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03-09-2018

CRN: 18-17445/18-17446

I, Det. Christopher Smith #4672
(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 03/06/2018, at 2506 Chelsea Avenue in
(Date) (Address)

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

W/M 08-15-1990, 5'8" 200lbs, BRO/HZL committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 03-06-2018 at approximately 1100 hours, Officers of the Kansas City Missouri Police Department were conducting surveillance on a single family residence located at 2506 Chelsea Avenue, Kansas City, Jackson County Missouri 64127. Undercover officers were conducting surveillance on the house as a known residence with ties to subjects known to be involved in narcotics, firearms and stolen automobiles. While officers were conducting surveillance on the residence, an undercover officer observed a dark colored, four door Buick sedan with a temporary tag driving southbound on Chelsea Avenue. As the vehicle slowed in front of 2506 Chelsea Avenue, the front right passenger of the vehicle produced a firearm which he stuck out the window and began shooting in the direction of 2506 Chelsea Avenue. The vehicle fled the scene and the undercover officer pursued the vehicle. During the pursuit, the front right passenger, a male leaned out the window and pointed a firearm at the pursuing undercover officer's unmarked vehicle with no indication of law enforcement association and fired multiple shots at his vehicle. The suspect vehicle subsequently crashed at 2500 Brighton and the suspects fled on foot. The suspects were located by police and taken into custody. The undercover officer's vehicle was determined to have been struck by gunfire on the driver's side of the front bumper. An independent witness was located who positively identified Dane Andrew Hill B/M 12/06/1991 as one of the males who fled the suspect vehicle.

Three handguns were located in the yard of 2501 Poplar Avenue which is one block west from where the Buick crashed. The three handguns recovered at 2501 Poplar were identified as a black semi-automatic .45 caliber, a .22 caliber revolver, and a .32 caliber revolver with a pink handle. The description Brown gave of Hills' firearms matches the description of the guns recovered from 2501 Poplar. While processing the original crime scene located at 2506 Chelsea, a Sig 45 auto spent shell casing was recovered from the roadway just south of the neighboring address of 2508 Chelsea. A projectile was also recovered from the roadway directly in front of and east of 2506 Chelsea. The .45 caliber semi-automatic handgun recovered from 2501 Poplar was identified as a Rock Island Armory model 1911 with serial number RIA1668843. A computer check of the serial number in REJIS revealed an NCIC entry noting this handgun to have been reported as stolen in Kansas City Missouri on 11-04-2016.

Hill was transported to Police Headquarters and escorted to an interview room located on the 6th Floor. Hill was read his Miranda Rights aloud by detectives and agreed to waive his rights and provide a formal statement. After a lengthy interview, Hill admitted he was the passenger in the Buick. Hill stated Shawn picked him up on

PROBABLE CAUSE STATEMENT FORM

CRN 18-17445/18-17446

the morning of 3/6/18 and told him to bring his gun. Hill described he possessed a .22 revolver and described Shawn's gun as a "1911" .45 caliber handgun. Hill stated Brown made multiple telephone calls on a cellphone while driving towards the address in which Hill believed Brown was making sure someone would be at the residence when they arrived. Hill stated both he and Shawn Brown shot at 2506 Chelsea Avenue. Hill stated Shawn told him to aim for the first floor of the residence. Hill stated he didn't believe he struck the house, and thought he had fired into the air. Hill further admitted he shot at an SUV in Blue Valley Park because he thought it was associated to the address at 2506 Chelsea.

Shawn M. Brown, WM, 08/15/90 was taken into custody at 2505 Chelsea Avenue and transported to Police Headquarters. He provided a statement to detectives after being advised of his rights per Miranda. Brown admitted he was the driver of the Buick involved in this offense and Dane Hill was the passenger. He positively identified Dane A. Hill, BM, 12/06/91 from a photograph lineup. Brown stated Hill was the only other occupant in the vehicle and identified Hill as the individual who shot at the residence at 25th and Chelsea and later at a vehicle in Blue Valley Park. He stated Hill was angry at an individual named Shane who is associated to the address on Chelsea because Shane had threatened the mother of his Hill's child. Brown stated he drove around the block several times before the shooting. Brown admits he was in possession of the .45 caliber handgun and pointed it in the direction of the residence. However, Brown stated he couldn't bring himself to pull the trigger so Hill took the handgun from him and shot at the residence with it. Brown described three firearms Hill had in his possession during this offense which was consistent with the three firearms recovered from 2501 Poplar.

Printed Name Det. Christopher Smith Signature /s/ Det/ Christopher Smith #4672

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

\_\_\_\_\_  
Judge

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