

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	18-044067
PROSECUTOR NO. :	095446265
OCN:	AN017731

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MARC A. BARRON)	
1904 S. Hedges Ave.)	CASE NO. 1816-CR
Independence, MO 64052)	DIVISION
DOB: 01/21/1999)	
Race/Sex: B/M)	
[REDACTED])	
)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 June 23, 2018, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Cahoone Littlejohn caused the death of Cahoone Littlejohn by shooting him.

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 June 23, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in

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Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) 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/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4488
hwilliams@jacksongov.org

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WITNESSES:

1. PO Amanda Anderson, 223 N. Memorial Drive, Independence, MO 64050
2. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
3. PO Logan Dale, 223 N. Memorial Drive, Independence, MO 64050
4. DET Jaime Harraman, 223 N. Memorial Drive, Independence, MO 64050
5. PO Kurt Jarnagin, 223 N. Memorial Drive, Independence, MO 64050
6. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050

7. [REDACTED]

[REDACTED]

[REDACTED]

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10. CST Jason Myers, 223 N. Memorial Drive, Independence, MO 64050
11. DET Erin Provost, 223 N. Memorial Drive, Independence, MO 64050
12. [REDACTED]
13. DET Steven Schmidli, 223 N. Memorial Drive, Independence, MO 64050
14. PO Daniel Thompson, 223 N. Memorial Dr., Independence, MO 64050
15. PO Walter Thompson, 223 N. Memorial Drive, Independence, MO 64050
16. PO Jordan White, 223 N. Memorial Drive, Independence, MO 64050

17. [REDACTED]

PROBABLE CAUSE STATEMENT

Date: 6/23/2018

Report #: 2018-44067

I, Christopher Burris, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 6/23/2018, at approximately 1358 hours, Marc A. Barron, (Race- Black, Sex- Male, DOB- 01/21/1999, Address-1904 S. Hedges Avenue, [REDACTED]), committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 06/23/2018 at approximately 1358 hours, Independence Police Officers responded to 10507 E. 23rd Street, Fav Trip, Independence, Jackson County, Missouri in reference to a shooting.

Upon arrival, responding officers located a black male subject who had been shot in an adjacent A&M Cleaners parking lot, just west of the Fav Trip. Officers learned that the suspect had run into the Fav Trip. Officers located and detained the suspect, later identified as Marc Barron. Life saving measures were implemented by officers and EMS personnel, on the black male subject. The victim was ultimately pronounced dead at the scene. The black male victim was identified as Cahoon Littlejohn. Initial observations revealed that Littlejohn had been shot at least three times. Littlejohn had been shot in the upper left shoulder, lower right side chest area and in the lower back.

Independence Police Officer Daniel Thompson contacted the victim's girlfriend "[REDACTED]", and identified her as a witness to this incident. Officer Thompson obtained an initial interview from "[REDACTED]". According to "[REDACTED]", she reported that there was a confrontation between Littlejohn and Barron after Littlejohn almost struck him with his vehicle, while backing up in the parking lot. "[REDACTED]" reported that when Barron exited Fav Trip, he and Littlejohn became involved in a verbal argument. "[REDACTED]" stated that the argument escalated into a physical altercation where punches were thrown. According to "[REDACTED]" Barron then pulled out a black handgun and Littlejohn said "whoa" after seeing the firearm and took a step backward causing him to trip. "[REDACTED]" stated that was when she heard several shots. "[REDACTED]" advised she confronted Barron and he pointed the gun at her. "[REDACTED]" said she told Barron "Please don't kill me". "[REDACTED]" told officers that Barron ran into the "Fav Trip" after he shot Littlejohn.

A 16 year old patron leaving the gas station reported hearing the confrontation and gunshots. The patron identified as [REDACTED] learned his vehicle had been shot twice after he returned home. [REDACTED] returned to the scene.

Investigators were summoned to the scene and several witnesses were subsequently interviewed at Police Headquarters including [REDACTED]" and [REDACTED]"

Fav Trip was equipped with several surveillance cameras which were reviewed. The video showed the incident which "[REDACTED]" initially reported to officers. The video showed Littlejohn backing his vehicle up as Barron is walking to the front door of the business. Barron can be seen making contact with the rear of Littlejohn's vehicle with his hand. Littlejohn then proceeds to back to the vacuum area on the west side of the parking lot. Barron was observed to be purchasing items in the business. Barron subsequently exited the store and walks to his vehicle at a gas pump. It appears that Littlejohn was smoking a cigarette outside of his vehicle, when he began to make verbal contact with Barron causing him to approach Littlejohn. Both Littlejohn and Barron contact each other on the driver's side of Littlejohn's vehicle. It appeared as if there was some type confrontation between the two, in which Littlejohn punches Barron. Barron stumbles back and removes a handgun from his waist and fires it, subsequently striking Littlejohn, who is running away from Barron. Barron continues to fire several rounds and pursues Littlejohn around the rear of his vehicle, where Littlejohn ultimately collapses in the adjacent A&M Cleaners parking lot. Barron then runs back into the store. Barron

surrenders his firearm on the counter inside Fav Trip, uses his cell phone to notify his girlfriend of the incident and waits for police.

The scene revealed that 13 shots had been fired. Thirteen .40 caliber shell casings were recovered at the crime scene. The firearm that was used by Barron was also recovered. The firearm was identified as a .40 caliber Springfield XDS bearing serial number # MG258584. A check of the serial number revealed it was reported stolen out of Kansas.

Barron was subsequently interviewed by Detective Steve Schmidli and Chris Burris. Barron was read his Miranda rights, subsequently waiving them. Barron admitted shooting Littlejohn but claimed it was in self defense. Barron's statement was consistent with the events leading up to the shooting. Barron advised when he walked out of the business, Littlejohn was saying something to him but he could not hear what he was saying. Barron advised he approached Littlejohn who told him to never touch his vehicle again. Barron said Littlejohn then said something to him about knocking him "out" or putting him "out". Barron told investigators that Littlejohn punched him in the face. Barron advised the punch from Littlejohn knocked out a tooth. Barron said he pulled out his Springfield XDS .40 caliber handgun from his waistband and began firing shots at Littlejohn because he feared for his safety. Barron wasn't sure how many shots he fired. Barron said that he continued to fire shots at Littlejohn because he was afraid Littlejohn was going to retrieve a weapon.

Detective Christopher Burris # 1401

/S/ Christopher Burris

Print Name

Signature