

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

Police# 16-011001  
Prosecutor# 095431988  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Demarco J. Summers  
4934 Michigan Ave.  
Kansas City, MO 64130  
DOB: 06/08/2000; Race/Sex: B/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Robbery 1st Degree (569.020-001Y19791204.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, 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 February 15, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with others, forcibly stole a handgun in the possession of [REDACTED], and in the course thereof another person was armed with a deadly weapon.

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 February 15, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count I, 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.

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

# PROBABLE CAUSE STATEMENT FORM

Date: 02/22/2016

CRN: 16-11001

I, Detective Hobart Price #5254

(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 02/15/2016, at 3923 Willow Ave in  
(Date) (Address)

Kansas City, Jackson Missouri Demarco Summers  
(County) (Name of Offender(s))

B/M 06/08/2000 committed one or more criminal offense(s).  
(Description of Identity)

Felony Murder, Robbery, Tampering with a motor vehicle, Armed Criminal Action

The facts supporting this belief are as follows:

On 02/15/2016 at 1008 hours Officers of the Kansas City Missouri Police Department were dispatched to 10415 E 39 Ter, Kansas City, Jackson County Missouri on a reported shooting. Upon arrival they located a victim who was shot in the hand and chest. The victim was transported to Center Point Hospital with life threatening injuries and later succumbed to his injuries. It was determined the actual shooting took place at 3923 Willow Ave, Kansas City, Jackson County, Missouri.

Numerous witnesses were identified and interviewed along with the listed parties involved. Based on witness statements and surveillance video at the scene it is believed [REDACTED], DEMARCO SUMMERS, and the victim JALAIR STRONG devised a plan to commit a robbery against [REDACTED] to take his gun. A witness reported to detectives, that he spoke to [REDACTED] on the phone. [REDACTED] admitted that he along with SUMMERS, STRONG and [REDACTED] were going to rob a man selling marijuana. The plan of robbing a man selling marijuana was a rouse to get [REDACTED] to hand over his gun to [REDACTED], SUMMERS and STRONG.

[REDACTED] SUMMERS and STRONG picked up [REDACTED] in a stolen car. The car was reported stolen from 8916 E 52 Ter., Kansas City, Jackson County, Missouri on 02/15/2016. They responded to 3923 Willow Ave to meet the fictitious person selling marijuana.

While waiting for the "weedman" to show up, [REDACTED] suggested they should rob the "weedman". [REDACTED] asked [REDACTED] if he had his "banger" (gun). [REDACTED] said, "Yeah". STRONG told [REDACTED] to give him the gun. [REDACTED] gave STRONG his gun. STRONG pointed the gun at [REDACTED] and told him to get out of the car, he was taking the gun. [REDACTED] stated, "You're going to have to kill me over my gun." [REDACTED] and STRONG began fighting over the gun in the back seat of the stolen car. The rear passenger side door opened and STRONG and [REDACTED] fell out of the car onto the ground. While fighting over the gun the gun discharges and STRONG is struck in the hand and chest with the bullet. STRONG runs to 10415 E 39 Ter where he disappears and is located when Police arrive. [REDACTED] walks away from the scene with the gun and admits to hiding the gun at his friend's house. The gun is later recovered by Detectives after [REDACTED] admits where he

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hid the gun. [REDACTED] and SUMMERS drive away in the stolen vehicle and are involved in a vehicular accident a short distance from the homicide. [REDACTED] and SUMMERS walk back to the crime scene and found STRONG behind 10415 E 39 Ter and were contacted by the Police.

The Jackson County Medical Examiner conducted an Autopsy and determined his death to be a homicide.

Printed Name Hobart Price #5254 Signature Hobart Price #5254

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

\_\_\_\_\_  
Judge

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

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

Police# 16-016302  
Prosecutor# 095431983  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Demarco J. Summers  
4934 Michigan Ave.  
Kansas City, MO 64130  
DOB: 06/08/2000; Race/Sex: B/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Discharge/shoot Firearm At Or From Motor Vehicle/shoot At Person, Another  
Motor Vehicle, Or Building/habitable Structure- /prior Offender (571.030-  
002Y20035213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the class (B) (A) 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 7, 2016, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, knowingly discharged a firearm from a Green Jeep Cherokee, 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.

**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 7, 2016, in the county of Jackson, State of Missouri, the defendant committe the felony of Unlawful Use of a Weapon charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant 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. 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.

### **Count III. Tampering With Motor Vehicle 1st Degree (569.080-002Y20052902.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class C felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about March 7, 2016], in the county of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile, i.e. a Green Jeep Cherokee.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

### **Count IV. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20054801.0)**

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 D felony of resisting a lawful stop, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about March 7, 2016, in the county of Jackson, State of Missouri, Officer Lambright and Pickens, law enforcement officers, were attempting to make a lawful stop of a vehicle being operated by the defendant, and the defendant knew or reasonably should have known that the officers were making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and the defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that the defendant operated the vehicle at excessive speeds, weaving into and out of traffic, failing to stop for traffic control signals on 31st St. and Paseo Blvd. until he eventually crashed into a parked car on 57th Street.

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 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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,

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Bryan O. Covinsky (#47132)  
Assistant Prosecuting Attorney  
415 E. 12th Street, Fl 7M  
Kansas City, Missouri 64106  
(816) 881-3368  
BCovinsky@jacksongov.org

WITNESSES:

'''  
PO David Barbour , 1125 Locust, Kansas City, MO 64106  
[REDACTED]

DET Dawn M. Jones , 1125 Locust, Kansas City, MO 64106  
DET Dawn M. Minor , 1125 Locust, Kansas City, MO 64106  
[REDACTED]  
[REDACTED]  
[REDACTED]

DET Terrence D. Owens , 1125 Locust, Kansas City, MO 64106  
PO John D. Pickens , 1125 Locust, Kansas City, MO 64106  
[REDACTED]

# PROBABLE CAUSE STATEMENT FORM

Date: 05-06-2016

CRN: 16-16302

I, Detective Chason Crowell #5228

(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 03-07-2016, at 3221 Indiana Ave in  
(Date) (Address)

Kansas City, Jackson Missouri Summers, Demarco  
(County) (Name of Offender(s))

b/m 06-08-2000 committed one or more criminal offense(s).  
(Description of Identity)

- Assault
- Eluding
- Tampering with a Motor Vehicle

The facts supporting this belief are as follows:

On 03-07-2016 1527 hours, officers were dispatched to 3221 Indiana Ave., Kansas City, Jackson County, Missouri in regards to a shooting that had occurred. Officers in the area heard apparent gunshots and tires squealing. Officers then observed a green 2000 Jeep Cherokee (Missouri License UG9B2G, VIN: 1J4FF48S8YL111907) speeding away from the scene with arms hanging out the passenger side window. Officers activated their emergency lights and sirens in an attempt to stop the Jeep. The vehicle fled from officers failing to stop for stop lights, stop signs and reaching speeds of 90 MPH while attempting to elude officers. The Jeep eluded at excessive speeds through residential neighborhoods where speeds are 25 MPH. The Jeep continued to elude officers until it struck the rear end of a legally parked vehicle causing extensive damage. Five black male occupants fled from the Jeep and were taken into custody. The driver was identified as Summers, Demarco J b/m 06-08-2000. The front passenger was identified as [REDACTED] b/m 07-14-2000. [REDACTED] b/m 02-08-2000 was observed exiting the rear passenger door. [REDACTED] b/m 08-11-2000 was observed exiting the rear driver's side door. [REDACTED] b/m 06-15-2000 was observed exiting the rear passenger door.

The Jeep Cherokee responded back stolen out of Kansas City, Missouri on 03-04-2016 (16-15677).

A 45 caliber silver handgun (serial # DL18349) containing a magazine was located under the rear seat on the driver's side floorboard of the Jeep and contained no ammunition. A Ravens Arms model MP-25 .25 caliber pistol (serial # 794920) loaded with five live rounds of ammunition making it readily capable of lethal force was located under the rear seat in the middle. A spent 45 caliber shell casing was located on the front passenger side floorboard of the suspect vehicle.

Victim 1 and victim 2 stated they were coming out of school and saw [REDACTED] waiting for victim1. Victim 1 and victim 2 stated one of [REDACTED]'s friends struck victim 1 from behind and everyone started fighting. Victim 1 stated he was approximately one car length away from the vehicle when someone from the vehicle started shooting at them. Victim 1 heard two shots.

Victim 3 stated he was in a fight with some others outside the school. Victim 3 identified Summers as being involved in the disturbance. Victim 3 stated after the fight he was walking towards Linwood and Indiana and a vehicle started firing shots in his direction. Victim 3 stated he did not want to be a snitch.



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Witness 1 stated he heard the fight break out and he observed a male wearing a red hoodie that had a silver handgun.

Witness 2, security guard at the school, stated a physical altercation broke out and he responded to break it up. Witness 2 stated after the fight was broke up he saw a green mid 90's model Jeep Cherokee driving northbound on Indiana towards him and the victims. Witness 2 stated the Jeep slammed on its breaks, reversed back south and the rear passenger in a red hoodie leaned out the window holding a silver handgun and fired one shot into the crowd of victims. Witness 2 stated the Jeep left at a high rate of speed. Witness 2 positively identified [REDACTED] as the one that fired the silver colored handgun from the vehicle at the victims.

After waiving his rights [REDACTED] stated Summers picked him and the others up from school (De La Salle) and they went to Central High School to fight a kid that slapped Summers' sister. [REDACTED] stated he fired one shot from the rear seat on the passenger side at the victim (the kid they went to fight) to scare him. [REDACTED] stated he shot a Cobra 45 that was already in the car when he got in. [REDACTED] stated Summers told him to shoot at the victim. [REDACTED] stated he knew the vehicle was stolen that he was riding in at the time of the shooting. [REDACTED] stated he did not know who stole it, but Summers was driving today. [REDACTED] stated he was seated in the back seat directly behind the front passenger.

After waiving his rights [REDACTED] stated the driver (described Summers in the black shirt) picked him and his friends up from school at De La Salle. [REDACTED] stated the driver didn't take him home, but drove to Central High School. [REDACTED] stated they got out of the car and started to fight some kid, but the security guard broke it up. [REDACTED] stated when they got back into the vehicle the back passenger on the driver's side shot one or two times out of the car at the victim. [REDACTED] stated he told the driver several times to stop and the driver wouldn't. [REDACTED] stated there was only one gun in the car and it was the one that the red jacket guy shot. [REDACTED] described the gun as a silver pistol. [REDACTED] stated he did not know the vehicle they were in was stolen.

Printed Name Detective Chason Crowell #5228

Signature Det. CC #5228

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

\_\_\_\_\_  
Judge

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