

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

POLICE NO. :	18-057694
PROSECUTOR NO. :	095447038
OCN:	

STATE OF MISSOURI,	)	
	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
TREYVON D. SHEPHEARD	)	
1812 Topping	)	CASE NO. 1816-CR
Kansas City, MO 64127	)	DIVISION
DOB: 09/06/1998	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

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 July 29, 2018, in the County of Jackson, State of Missouri, the defendant (knowingly) (or) (with the purpose of causing serious physical injury to Leonard Joyner III caused the death of Leonard Joyner III 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 July 29, 2018, in the County of Jackson, State of

State vs. Trevyon D. Shepheard

Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, all allegations of which are incorporated herein by 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. 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 Physical Evidence In Felony Prosecution (575.100-001Y20175006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of

Section 575.100, RSMo, committed the **class E felony of tampering with physical evidence**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 29, 2018, in the County of Jackson, State of Missouri, the defendant concealed a Glock firearm with the purpose to impair its availability the investigation of the murder of Leonard Joyner III, an official investigation, and thereby impaired and obstructed the prosecution Trevyon Shepheard for the crime of murder in the second degree, a felony.

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.

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.

State vs. Trevyon D. Shephard

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/ Kristiane N. Bryant

Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St.
Floor 7M
Kansas City, MO 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

1. [REDACTED]
2. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
3. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
4. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
5. DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106
6. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. DET Vernon D. Huth, 1125 Locust, Kansas City, MO 64106
11. Daniel Johnson, 8703 E. 108th St, Kansas City, MO 64134
12. [REDACTED]
13. Leonard Joyner, 13330 Donnelly Ave, Grandview, MO 64030
14. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07-31-2018

CRN: 18-57694

I, Detective K. Oldham # 5166

(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 07-29-2018, at 3513 E. 51st St in
(Date) (Address)

Kansas City, Jackson Missouri Trevyon D. Sheppard
(County) (Name of Offender(s))

B/M, 09-06-98 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 7-29-2018 at 1543 hours, Kansas City Missouri Police Officers were dispatched to 3513 E. 51st St, Kansas City, Jackson County, Missouri on a shooting. Upon arrival they found the victim, Leonard Joyner, BM, 8-3-1960 lying in the street deceased from apparent gunshot wounds. Nine forty caliber shell casings were located at the scene. Apparent bullet shrapnel was located in the victim's upper back. Three divots were located in the asphalt where the victim was lying.

A female witness was transported to police headquarters and interviewed. She stated she heard a car accident outside of her apartment at the intersection of 51st St and Swope Parkway. While watching the accident she noted a tan car stopped in the roadway facing east. In front of the tan car was a black car. Behind the tan car was a white SUV. A black male driver of the tan car, later identified as the victim, exited the driver's seat and looked at the back of his car. A black female driver of the white SUV and black male passenger of the white SUV exited their vehicle and approached the victim. The three were having a conversation which the witness stated the black male passenger seemed to escalate as the victim was attempting to offer the black male and female money to fix the damage. As the black male passenger began to argue with the victim the black male brandished a firearm shooting the victim multiple times. The witness then stated the black female ran back to the driver's seat of the white SUV at which time the black male began to return to the front passenger seat. While walking back the black male stopped and walked back towards the victim who was lying in the middle of the street. The black male then fired more shots at the victim and bent over reaching into the front seat of the victim's car. When the black male stood up the witness noticed the black male had a gun in each of his hands. The black male then went back to the white SUV's front passenger seat at which time the SUV turned around and left westbound on 51 st street.

Another witness was interviewed who stated she was driving her vehicle east on 51 St. just west of Swope Pkwy when she came to a stop sign. There were three vehicles in front of her. The first vehicle at the stop sign was a black sedan, the second vehicle was a champagne colored older sedan, and the third vehicle was a white SUV. The doors to the champagne sedan and white SUV were open and it appeared those two vehicles were just involved in vehicular accident. A black male, who appeared to be the occupant of the champagne sedan and later identified as the victim, was standing outside holding cash in his hand. There was a black male and a black female, who appeared to be the occupants of the white SUV standing outside as well. Those occupants appeared to be trying to take the cash from the victim and were arguing with the victim. The black male occupant of the white SUV produced a black semi-automatic handgun and shot the victim several times. He then went back to the white SUV, returned to the area of the victim's vehicle and shot the victim again while the victim was lying on the ground. The black male got in the passenger seat of the white SUV and the black female got in the driver seat of the SUV. The white SUV then fled the scene west on 51 St.

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Another witness was interviewed and stated she observed the male suspect shoot the victim and then took a firearm out of the victim's vehicle before fleeing the scene in the white SUV. This witness further advised that the female had her cell phone out and appeared to be taking photographs or recording the incident.

Another witness stated she was in her apartment to the south of the scene when she looked outside and observed the victim's vehicle in front of the suspect vehicle. The victim's vehicle rolled back into the suspect vehicle striking the suspect vehicle. The victim got out of his car and a black male and a black female got out of the suspect vehicle. The male and female suspects got very close to the victim and appeared to be yelling at him. It looked like the victim was trying to give the suspects money. The male suspect went into the passenger side of the suspect vehicle and came back with a gun. The female suspect got into the driver's seat and the male suspect continued to appear to yell at the victim. She did not see anything in the victim's hands. The male suspect stepped back and fired four times striking the victim. The male suspect got into the suspect vehicle and the vehicle backed up into the driveway of the witness' apartment entryway. The suspect vehicle then fled westbound on 51st.

Surveillance video from a neighboring apartment building was obtained which shows the aforementioned black sedan, the victim's champagne colored sedan and the white SUV as they approach the intersection of E 51st St and Swope Pkwy. The intersection is not visible but is near-by. A short time after the vehicles pass, the white SUV can be seen backing away from the intersection into the driveway of the apartments and then flee the scene west bound on E. 51st St. This video shows the white SUV to be a Chevrolet Trailblazer.

Detectives received an anonymous tip that stated the caller had information regarding the shooting at 51 St. and Swope Pkwy. The tipster added that "Rafeasia Kirkland" was driving the white SUV with her boyfriend "Tre" and they were involved in accident which led to "Tre" shooting "the guy".

A computer search of "Rafeasia Kirkland" through prior police reports revealed Rafeasisa M. Kirkland B/F 01-24-2000. Furthermore, she was involved in an aggravated assault on 07-04-2018 in which she was driving a white Chevrolet Trailblazer. In another police report Kirkland identifies Trevyon D. Shepherd B/M 09-06-1998 as her boyfriend.

On 07-30-2018 at approximately 0900 hours Homicide Detectives received a phone call from a woman identifying herself as Kirkland's mother. She stated she received several phone calls from Kirkland in which Kirkland stated she was being held captive by her boyfriend. Detectives responded to Kirkland's mother's residence and the mother tells them that Kirkland told her she was in "Hilltop...at the place she was last arrested" and that "he won't let me leave". Detectives were able to overhear Kirkland on the phone and could hear a black male in the background.

A search through prior police reports revealed Kirkland was arrested at 1812 Topping Ave. on 06-10-2018. It should be noted that 1812 Topping Ave. is in an apartment complex commonly referred to as "Hilltop". Detectives responded to 1812 Topping and set up a surveillance. Trevyon D. Shepherd, B/M 09-06-1998 was observed exiting the residence and was taken into custody on the front porch of the residence. Rafeasisa M. Kirkland B/F 01-24-2000 was ordered to come out of the residence and she complied and was taken into custody. Prior to Kirkland leaving the residence, she handed a cell phone to one of the juveniles at the residence.

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Shepherd was transported to Police Headquarters and advised of his Miranda Rights. Shepherd confessed that he was involved in a motor vehicle accident with the victim's vehicle. He stated the victim was attempting to pay him and another involved motorist ten dollars as restitution. He stated the victim had a twenty dollar bill in his right hand and another "wad" of money in his left hand. He stated he was pointing his finger into the palm of the victim's left hand telling him he had enough money to pay for the damage.

He stated the victim reached under the driver's seat of his vehicle and pulled out a firearm. Shepherd confessed that he pulled a .40 caliber Glock handgun from his waist band and shot the victim eight times. Shepherd advised he went back to his vehicle but returned to the victim's location where he picked the victim's gun up and returned to his vehicle. The victim's girlfriend, Kirkland drove him away from the scene. Shepherd confessed that he realized the victim's gun was fake or a BB gun and threw it out the window near 53rd St and Indiana Av. Detective located the firearm at this location. Shepherd initially stated that he threw the Glock firearm he used to shoot the victim into a wooded area near the area of E. 36th St and Topping Av however he later confessed that he had traded the firearm to an unknown male for a .40 caliber Smith and Wesson handgun.

Shepherd stated that the confrontation was being recorded by Kirkland on her iPhone but admitted that they had deleted the recording.

Printed Name Det K. Oldham # 5166 Signature /S/ Det K. Oldham # 5166

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 NO. :	18-057694
PROSECUTOR NO. :	095447040
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

RAFEASIA KIRKLAND

1812 Topping Ave

Kansas City, MO 64127

DOB: 01/24/2000

Race/Sex: B/F

DEFENDANT.)

COMPLAINT

Count I. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y20175006.0)

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Section 575.100, RSMo, committed the **class E felony of tampering with physical evidence**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 29, 2018, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, a BB Gun and with the purpose to impair its availability in the investigation of the murder of Leonard Joyner III, an official investigation and thereby impaired and obstructed the prosecution Trevyon Shephard for the crime of murder in the second degree, a felony.

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. Rafeasia Kirkland

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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/ Kristiane N. Bryant #69524

Kristiane N. Bryant

Assistant Prosecuting Attorney

Jackson County, MO

WITNESSES:

1. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07-30-2018

CRN: 18-57694

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PROBABLE CAUSE STATEMENT FORM

CRN 18-57694

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Shepherd was transported to Police Headquarters and advised of his Miranda Rights. Shepherd confessed that he was involved in a motor vehicle accident with the victim's vehicle. He stated the victim was attempting to pay him and another involved motorist ten dollars as restitution. He stated the victim had a twenty dollar bill in his right hand and another "wad" of money in his left hand. He stated he was pointing his finger into the palm of the victim's left hand telling him he had enough money to pay for the damage.

He stated the victim reached under the driver's seat of his vehicle and pulled out a firearm. Shepherd confessed that he pulled a .40 caliber Glock handgun from his waist band and shot the victim eight times. Shepherd advised he went back to his vehicle but returned to the victim's location where he picked the victim's gun up and returned to his vehicle. The victim's girlfriend, Kirkland drove him away from the scene. Shepherd confessed that he realized the victim's gun was fake or a BB gun and threw it out the window near 53rd St and Indiana Av. Detective located the firearm at this location. Shepherd initially stated that he threw the Glock firearm he used to shoot the victim into a wooded area near the area of E. 36th St and Topping Av however he later confessed that he had traded the firearm to an unknown male for a .40 caliber Smith and Wesson handgun.

Shepherd stated that the confrontation was being recorded by Kirkland on her iPhone but admitted that they had deleted the recording. Kirkland was advised of her Miranda rights and agreed to speak to detectives. During her interrogation she confessed to tampering with physical evidence by driving Shepherd away from the scene of the homicide to the location where he threw the victim's BB gun out of the window of her vehicle.

Printed Name Detective K. Oldham # 5166 Signature /S/ Det K. Oldham # 5166

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

Judge

Circuit Court of _____ County, State of Missouri.