

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	190120305
PROSECUTOR NO. :	095451568
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
TYNAN B. MULLEN	)	
414 SE Lana St.	)	CASE NO. 1916-CR
Lees Summit, MO 64086	)	DIVISION
DOB: 09/13/1999	)	
Race/Sex: W/M	)	
	)	
DEFENDANT.	)	

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 March 4, 2019, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Riley McCracken by shooting 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.

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 March 4, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count

State vs. Tynan B. Mullen

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 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

Probable Cause Statement Form

Date: 3/15/2019

Report: 190120305

I, Erica Hopper, 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 3/4/2019, at 10012 ½ E. 63rd Street, Raytown, Missouri 64133, Tynan B. Mullen, a white male born 09/13/1999, [REDACTED] committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On March 4, 2019, at approximately 2249 hours, Riley S. McCrackin, date of birth August 31, 1999, was shot to death by two unidentified individuals. The incident occurred in the rear parking lot area of 10012 East 63rd Street, Raytown, Missouri, identified as Raytown Recreation.

Multiple security video recordings of the incident were obtained. The video recordings show McCrackin exit the rear of Raytown Recreation and stand in the parking lot for a moment, as if he were waiting for someone. At one point he appears to look at his phone. Two subjects then emerge from the northeast corner of an adjacent business, 4M Building Solutions, located just north of Raytown Recreation, and approach McCrackin. One subject emerged from behind the building (Shooter #2), while the other subject emerged from behind a trash dumpster (Shooter #1). McCrackin appeared to know the subjects, as he began approaching them and had his hands in his pockets. The subjects initially had their hands in their pockets as they approached. Shooter #1 first brandished a handgun and fired multiple rounds at McCrackin. Shooter #2 also brandished a handgun and fired at McCrackin. McCrackin was mortally wounded. The subjects then fled the scene on foot, running north. During the subsequent investigation, five (5) .45 caliber shell casings were located, and three (3) 9mm shell casing were located.

During subsequent interviews, earlier in the day on March 4, 2019, a witness overheard two conversations between McCrackin and a subject identified as Logan England, date of birth October 1, 1999. The conversations occurred using the Snapchat application. The witness knew the conversations were with England because McCrackin identified England by name during one of the conversations, and the second conversation occurred on speakerphone, where they could hear. The witness had personal knowledge of England and recognized his voice. During the conversations between McCrackin and England, the witness heard them discussing England meeting McCrackin at Raytown Recreation that evening. Once McCrackin and the witness got to Raytown Recreation, England was not there. Immediately prior to the shooting, the witness stated McCrackin told them he was going outside to meet England.

On March 6, 2019, an interview was conducted with witnesses familiar with England. During the interview, they stated England arrived at their residence between 0100 and 0200 hours, on the morning of March 5, 2019. One witness stated they were on the couch in the residence and they heard England in his room, crying. The witness further stated the light in England's room never turned off. One witness stated they knew England for approximately a year and a half. During a subsequent interview on March 8, 2019, one witness observed a video recording of the incident. After watching the recording, they identified Shooter #1 as Logan England. The witness identified him as England based on the shooter's gait, posture, clothing, and the manner in which he wore his clothing. The witness stated they would recognize England if they only saw him from the rear while walking down the street.

On March 11, 2019, at approximately 1655 hours, the witness was interviewed a second time. The witness stated they received a telephone call at approximately 1143 hours, on March 11, 2019. The number the call originated from was identified as belonging to a subject who was identified as England's girlfriend. The witness further stated the individual on the phone identified himself as England. The witness stated England initially spoke to them about getting money to his mother. The witness subsequently told England they knew what was going on and stated, "You shot a man, they called me, I seen the video. I said you shot a man Logan." The witness stated England broke down crying and responded, "I know, I know, I know I did. I'm so mad at myself. I can't believe I did this." The witness further stated they told England to turn himself in. During the interview, the witness stated they had known England for approximately two years, and was around him almost daily.

On March 11, 2019, a witness familiar with England reported he left their residence at approximately 2000 hours, on March 4, 2019, and did not return until March 10, 2019. Upon his return, he cried and stated he was sorry for what he had done. The telephone bearing the number which England used to contact a previously mentioned witness was in this witnesses possession.

On March 11, 2019, without prior contact from law enforcement, England contacted the Raytown Police Department and informed them he would be voluntarily surrendering that afternoon. On March 11, 2019, at approximately 1600 hours, England voluntarily surrendered himself to the Raytown Police Department.

On March 14, 2019, multiple interviews were conducted with three other witnesses. Information was independently obtained and corroborated from each witness that identified Shooter #2 as Tynan Mullen, date of birth September 13, 1999. All three witnesses stated they were told facts about the incident by England.

According to the witness' statements, Mullen, England, one of the aforementioned witnesses, and another witness were together on March 4, 2019, traveling in a white Dodge Dart owned by Mullen. They stated Mullen was driving, and England was in the rear passenger seat. Prior to the shooting, they stated England was already in possession of a firearm, but they went to one of the witnesses residences and obtained a firearm for Mullen. They also went to a gas station in Raytown, identified as a BP gas station, located at 10901 E State Route 350, Raytown, Missouri. After leaving the gas station, they parked on a dead end road west of Raytown Road and north of Raytown Recreation, identified as East 60th Terrace. The witnesses stated Mullen and England were going to meet McCrackin to have a discussion about an issue between them. Once parked, the witnesses stated Mullen and England exited the car and began walking south, toward Raytown Recreation. Several minutes elapsed until Mullen and England returned. After returning to the vehicle, they left the area and took one of the witnesses home. The remaining witness and Mullen then dropped England off at another witnesses residence. After dropping England off, Mullen and the remaining witness picked up another friend and returned to Raytown Recreation, where they met with friends of McCrackin.

On March 15, 2019, surveillance video was obtained from the aforementioned BP gas station. On March 4, 2019, at approximately 2058 hours, Mullen's white Dodge Dart pulled into the parking lot, and Mullen entered the store. Two of the witnesses can be seen in the vehicle, and a fourth person can be seen in the rear passenger seat, however they are unidentifiable in the video. The shoes and pants Mullen is wearing while entering the gas station are consistent with the clothing worn by Shooter #2 in the security video recordings of the incident.

On March 15th, 2019, after reviewing surveillance video from the BP gas station, Mullen's white Dodge Dart vehicle bearing Missouri temporary license plate of 041JQF expiring 3/21/2019 was parked in front of his residence in Jackson County Missouri. At approximately 1230 hours, the vehicle left the residence. The vehicle was stopped by a marked Missouri State Highway Patrol unit. The white Dodge Dart was occupied by Mullen

and Kaci Cox, a white female born June 26th, 2001. Mullen and Cox were arrested without incident and were transported to the Raytown Police Department.

An interview with Cox was conducted in a recorded interview room. Cox advised she was with Mullen when they received a text from England asking to hang out. Cox stated she and Mullen went to meet up with a witness and England at a private residence. She stated there was a meeting planned between Mullen, England and McCrackin. Prior to the meeting, Cox advised they all went to Cox's residence and Cox got out of the vehicle and stole her brother's handgun out of the trunk of his silver-colored vehicle. Shortly before the shooting, Cox gave the handgun to Mullen. Subsequent to obtaining the handgun, all four (4) drove to and parked in a residential area near the scene of the shooting. Cox advised she was sitting in the front passenger seat, Mullen was in the driver's seat, England was in the rear passenger seat and the witness was in the rear driver's seat. Cox advised England and Mullen got out of the vehicle and left walking. A short time later, England and Mullen return to the vehicle and they fled the area. Ultimately, the witness was taken to a private residence and England was transported to a different residence, north of Kansas City. Subsequent to dropping the witness and England off, Cox and Mullen return to the scene of the shooting to comfort the victim's girlfriend.

Name: Det. E. Hopper #1680

Signature: /s/ Det. E. Hopper #1680

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	190120305
PROSECUTOR NO. :	095451569
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

KACI COX

5839 Wallace Ave

Kansas City, MO 64129

DOB: 06/26/2001

Race/Sex: W/F

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 March 4, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, knowingly caused the death of Riley McCrackin 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 March 4, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, committed

State vs. Kaci Cox

the felony of murder in the second degree, charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant, either acting alone or purposely in concert with another, 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 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

Probable Cause Statement Form

Date: 3/15/2019

Report: 190120305

I, Erica Hopper, 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 3/4/2019, at 10012 ½ E. 63rd Street, Raytown, Missouri 64133, Kaci Cox, a white female born 06/26/2001, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On March 4, 2019, at approximately 2249 hours, Riley S. McCrackin, date of birth August 31, 1999, was shot to death by two unidentified individuals. The incident occurred in the rear parking lot area of 10012 East 63rd Street, Raytown, Missouri, identified as Raytown Recreation.

Multiple security video recordings of the incident were obtained. The video recordings show McCrackin exit the rear of Raytown Recreation and stand in the parking lot for a moment, as if he were waiting for someone. At one point he appears to look at his phone. Two subjects then emerge from the northeast corner of an adjacent business, 4M Building Solutions, located just north of Raytown Recreation, and approach McCrackin. One subject emerged from behind the building (Shooter #2), while the other subject emerged from behind a trash dumpster (Shooter #1). McCrackin appeared to know the subjects, as he began approaching them and had his hands in his pockets. The subjects initially had their hands in their pockets as they approached. Shooter #1 first brandished a handgun and fired multiple rounds at McCrackin. Shooter #2 also brandished a handgun and fired at McCrackin. McCrackin was mortally wounded. The subjects then fled the scene on foot, running north. During the subsequent investigation, five (5) .45 caliber shell casings were located, and three (3) 9mm shell casing were located.

During subsequent interviews, earlier in the day on March 4, 2019, a witness overheard two conversations between McCrackin and a subject identified as Logan England, date of birth October 1, 1999. The conversations occurred using the Snapchat application. The witness knew the conversations were with England because McCrackin identified England by name during one of the conversations, and the second conversation occurred on speakerphone, where they could hear. The witness had personal knowledge of England and recognized his voice. During the conversations between McCrackin and England, the witness heard them discussing England meeting McCrackin at Raytown Recreation that evening. Once McCrackin and the witness got to Raytown Recreation, England was not there. Immediately prior to the shooting, the witness stated McCrackin told them he was going outside to meet England.

On March 6, 2019, an interview was conducted with witnesses familiar with England. During the interview, they stated England arrived at their residence between 0100 and 0200 hours, on the morning of March 5, 2019. One witness stated they were on the couch in the residence and they heard England in his room, crying. The witness further stated the light in England's room never turned off. One witness stated they knew England for approximately a year and a half. During a subsequent interview on March 8, 2019, one witness observed a video recording of the incident. After watching the recording, they identified Shooter #1 as Logan England. The witness identified him as England based on the shooter's gait, posture, clothing, and the manner in which he wore his clothing. The witness stated they would recognize England if they only saw him from the rear while walking down the street.

On March 11, 2019, at approximately 1655 hours, the witness was interviewed a second time. The witness stated they received a telephone call at approximately 1143 hours, on March 11, 2019. The number the call originated from was identified as belonging to a subject who was identified as England's girlfriend. The witness further stated the individual on the phone identified himself as England. The witness stated England initially spoke to them about getting money to his mother. The witness subsequently told England they knew what was going on and stated, "You shot a man, they called me, I seen the video. I said you shot a man Logan." The witness stated England broke down crying and responded, "I know, I know, I know I did. I'm so mad at myself. I can't believe I did this." The witness further stated they told England to turn himself in. During the interview, the witness stated they had known England for approximately two years, and was around him almost daily.

On March 11, 2019, a witness familiar with England reported he left their residence at approximately 2000 hours, on March 4, 2019, and did not return until March 10, 2019. Upon his return, he cried and stated he was sorry for what he had done. The telephone bearing the number which England used to contact a previously mentioned witness was in this witnesses possession.

On March 11, 2019, without prior contact from law enforcement, England contacted the Raytown Police Department and informed them he would be voluntarily surrendering that afternoon. On March 11, 2019, at approximately 1600 hours, England voluntarily surrendered himself to the Raytown Police Department.

On March 14, 2019, multiple interviews were conducted with three other witnesses. Information was independently obtained and corroborated from each witness that identified Shooter #2 as Tynan Mullen, date of birth September 13, 1999. All three witnesses stated they were told facts about the incident by England.

According to the witness' statements, Mullen, England, one of the aforementioned witnesses, and another witness were together on March 4, 2019, traveling in a white Dodge Dart owned by Mullen. They stated Mullen was driving, and England was in the rear passenger seat. Prior to the shooting, they stated England was already in possession of a firearm, but they went to one of the witnesses residences and obtained a firearm for Mullen. They also went to a gas station in Raytown, identified as a BP gas station, located at 10901 E State Route 350, Raytown, Missouri. After leaving the gas station, they parked on a dead end road west of Raytown Road and north of Raytown Recreation, identified as East 60th Terrace. The witnesses stated Mullen and England were going to meet McCrackin to have a discussion about an issue between them. Once parked, the witnesses stated Mullen and England exited the car and began walking south, toward Raytown Recreation. Several minutes elapsed until Mullen and England returned. After returning to the vehicle, they left the area and took one of the witnesses home. The remaining witness and Mullen then dropped England off at another witnesses residence. After dropping England off, Mullen and the remaining witness picked up another friend and returned to Raytown Recreation, where they met with friends of McCrackin.

On March 15, 2019, surveillance video was obtained from the aforementioned BP gas station. On March 4, 2019, at approximately 2058 hours, Mullen's white Dodge Dart pulled into the parking lot, and Mullen entered the store. Two of the witnesses can be seen in the vehicle, and a fourth person can be seen in the rear passenger seat, however they are unidentifiable in the video. The shoes and pants Mullen is wearing while entering the gas station are consistent with the clothing worn by Shooter #2 in the security video recordings of the incident.

On March 15th, 2019, after reviewing surveillance video from the BP gas station, Mullen's white Dodge Dart vehicle bearing Missouri temporary license plate of 041JQF expiring 3/21/2019 was parked in front of his residence in Jackson County Missouri. At approximately 1230 hours, the vehicle left the residence. The vehicle was stopped by a marked Missouri State Highway Patrol unit. The white Dodge Dart was occupied by Mullen

and Kaci Cox, a white female born June 26th, 2001. Mullen and Cox were arrested without incident and were transported to the Raytown Police Department.

An interview with Cox was conducted in a recorded interview room. Cox advised she was with Mullen when they received a text from England asking to hang out. Cox stated she and Mullen went to meet up with a witness and England at a private residence. She stated there was a meeting planned between Mullen, England and McCrackin. Prior to the meeting, Cox advised they all went to Cox's residence and Cox got out of the vehicle and stole her brother's handgun out of the trunk of his silver-colored vehicle. Shortly before the shooting, Cox gave the handgun to Mullen. Subsequent to obtaining the handgun, all four (4) drove to and parked in a residential area near the scene of the shooting. Cox advised she was sitting in the front passenger seat, Mullen was in the driver's seat, England was in the rear passenger seat and the witness was in the rear driver's seat. Cox advised England and Mullen got out of the vehicle and left walking. A short time later, England and Mullen return to the vehicle and they fled the area. Ultimately, the witness was taken to a private residence and England was transported to a different residence, north of Kansas City. Subsequent to dropping the witness and England off, Cox and Mullen return to the scene of the shooting to comfort the victim's girlfriend.

Name: Det. E. Hopper #1680

Signature: /s/ Det. E. Hopper #1680