


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

POLICE NO. :	18-072582
PROSECUTOR NO. :	095451965
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
RYAN L. RAISLEY)	
7705 W. 108th St.)	CASE NO. 1916-CR
Kansas City, MO 64134)	DIVISION
DOB: 06/24/1987)	
Race/Sex: W/M)	
)	
	DEFENDANT.)

COMPLAINT

Count I. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20172902.0)

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 D felony of tampering in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 19, 2018, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile, a Ford EC3.

The range of 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 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 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.

Count II. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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,

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committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 19, 2018, in the County of Jackson, State of Missouri, David L. Cannon was killed by blunt force injuries sustained when a Ford EC3 being driven by the defendant crashed into David L. Cannon's Ford F-150 as a result of the perpetration of the class D felony of tampering with a motor vehicle under Section 569.080, RSMo. committed by the defendant on or about September 19, 2018, in the County of Jackson, State of Missouri.

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 III. Leaving Scene Of Accident - Accident Resulting In Death (577.060-006Y20175401.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.060, RSMo, committed **the class D felony of leaving the scene of an accident**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 19, 2019, the defendant, while operating a motor vehicle at Bannister and Wornall Rd. in the County of Jackson, State of Missouri, was involved in an accident that resulted in death to David L. Cannon, and the defendant knew that such accident had occurred, and defendant left the location of the accident without stopping and giving defendant's name, residential address, license number of defendant's vehicle, and operator's license number to the other party in the accident, a law enforcement officer in the vicinity, or to the nearest law enforcement agency.

The range of 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 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 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.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

State vs. Ryan L. Raisley

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Daniel Portnoy
Daniel Portnoy (#62186)
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WITNESSES:

1. DET Gary L. Burgess, 1125 Locust, Kansas City, MO 64106
2. DET Christopher G. Hayes, 1125 Locust, Kansas City, MO 64106
3. PO Jamie D. Lamb, 1125 Locust, Kansas City, MO 64106
4. PO Lawrence R. Pollard, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/05/2019

CRN: 18-072582

I, Det. Lawrence Pollard #5044

(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 09/19/2019, at E. Bannister Road and Wornall Rd in

Kansas City, Jackson Missouri, RYAN L RAISLEY W/M 06/24/1987
(County) (Date) (Address) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

Vehicular Manslaughter/Leaving the Scene

The facts supporting this belief are as follows:

On 09/19/2018 at approximately 1107 hours, Kansas City, Missouri Police Officers responded to Bannister Road and Wornall Road, Kansas City, Jackson County, Missouri in regard to a hit and run injury crash. A white Ford EC3, which was stolen from Overland Park, Kansas, (OP,KS PD report #2018-019213) was traveling east on Bannister Road at at high rate of speed. The Ford EC3 failed to stop for a red traffic signal at Bannister and Wornall and struck a red, Ford F150 bearing Missouri license plate 4CG77, which was traveling south on Wornall Road. After the collision, the driver of the Ford EC3 fled the scene on foot. The driver of the Ford F150, David L Cannon (w/m, 12/29/1938) was transported to an area hospital and later died from injuries he sustained in the crash. Blood evidence was collected from the driver's visor and interior of the windshield of the Ford EC3 and sent to the Kansas City Police Crime Laboratory for DNA analysis.

On 09/24/2018 at 1000 hours, Kansas City Missouri Police Detectives responded to 7705 E. 108th Street, Kansas City, Jackson County, Missouri in regard to a tip (#452-C24966) that "Bryan Raisley" was possibly involved in the crash at Bannister and Wornall. An investigation revealed the individual's correct name to be Ryan L Raisley (w/m, 06/24/1987). The detectives contacted Raisley and observed him continuously put the fingers of his right hand inside his waistband. Det. Hayes asked what he was doing in his waistband and advised him to show the detectives his hands. Raisley then pulled his right hand away from his waistband and handed Det. Hayes a clear glass pipe that contained a brownish residue commonly used to smoke methamphetamine. Det. Hayes arrested Raisley for possession of drug paraphernalia and a search incident to arrest revealed two plastic baggies which contained a white crystal like substance, which later tested positive as methamphetamine. Raisley was arrested for possession of Methamphetamine (KCPD CRN# 18-073990) and the glass pipe was recovered and sent to the Kansas City Police Crime Laboratory for DNA testing.

On 09/24/2018 at 1125 hours, Raisley was escorted from a detention cell to an interview room. Raisley was read his Miranda Rights and he signed the Miranda Waiver. Raisley denied any knowledge or involvement in the crash at Bannister and Wornall. Raisley was then asked to submit a buccal swab and he requested to speak to a lawyer, so the interview was concluded and a buccal swab was not obtained.

On 03/18/2019 detectives received a report from the Kansas City Police Crime Laboratory. The report compared the genetic information from an unknown male profile, which was created from the blood that was recovered from the driver's visor and interior windshield of the Ford EC3, to the swab of the glass pipe recovered from Raisley. The genetic information from the swab of the glass pipe matched the genetic information from the unknown male profile that was created from the blood recovered from the inside of the Ford EC3.

PROBABLE CAUSE STATEMENT FORM

CRN 18-072582

On 03/25/2019 Kansas City Missouri Traffic Investigation Section Detectives applied for and were granted a search warrant to obtain a buccal swab from Raisley to create a DNA profile for comparison to the blood evidence recovered from the Ford EC3 involved in the fatality crash. On 03/27/2019 the search warrant for Raisley's DNA was executed at South Patrol Division. The buccal swab was recovered and released to the Kansas City Police Crime Lab for analysis.

On 04/03/2019 a genetic profile was created for Raisley using the DNA recovered on 03/27/2019 by the Kansas City Police Crime Lab. On 04/04/2019 detectives received a report from the Kansas City Police Crime Laboratory stating the genetic profile for Raisley was compared to the blood swab from the driver's visor of the EC3 and a blood swab from the driver's side windshield of the EC3. The genetic profile from the blood on the visor and the blood from the windshield is 94 septillion times more likely to be observed if Ryan Raisley is the contributor to this sample than if an unknown individual is the contributor.

Printed Name Det. Lawrence Pollard #5044

Signature

Det. Lawrence Pollard #5044

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

Judge

Circuit Court of _____ County, State of Missouri.