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

POI	LICE NO.:	KC1906	55657
PROSECU	TOR NO.:	0954546	545
	OCN:		
STATE OF MISSOURI,)
,	PLAIN	TIFF,)
vs.		,)
		•)
MICHAEL D. WILSON		,)
7219 E. 87th St.		,) CASE NO. 1916-CR
Kansas City, MO 64138		•	DIVISION
DOB: 02/28/1988		,)
Race/Sex: B/M		()
		,)
	DEFENI	DANT.)
	COMPI	TATNT	ר

COMPLAINT WARRANT REQUESTED

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 August 29, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Elijah J. Muhammad caused the death of Elijah J. Muhammad 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 August 29, 2019, in the County of Jackson, State of

State vs. Michael D. Wilson

Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, 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. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 29, 2019, in the County of Jackson, State of Missouri, the defendant shot the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on

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. 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.

State vs. Michael D. Wilson

Count IV. 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 August 29, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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.

Count V. Assault 1st Degree Or Attempt (565.050-002Y19791304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 29, 2019, in the County of Jackson, State of Missouri, the defendant shot at the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of was done for the purpose of committing such assault.

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 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.

State vs. Michael D. Wilson

Count VI. 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 August 29, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault 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/ Katherine Baker Nelson
Katherine Baker Nelson (#62733)
Assistant Prosecuting Attorney
415 E. 12th Street, 11th Floor
Kansas City, MO 64106

(816) 881-3560 kjbaker@jacksongov.org

WITNESSES:

- 1. 64106
- 2. PO Kenneth W. Allen, 1125 Locust, Kansas City, MO 64106
- DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
- 5. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
- 6. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
- 7. **6**4106

MO 64106

- 10. PO Nikole McCormick, 1125 Locust, Kansas City, MO 64106
- 11. Elijah J. Muhammad, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 12. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
- 13. DET Angelina M. Sanchez, 1125 Locust, Kansas City, MO 64106

14. Ethan Skinner, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: _08-30-2019				CR	N: KC19	065657	
I, Det. Daniel W. Frazier							
(Name and identify law enforcement office	er, or person ha	ving inform	ation as prol	bable cause.	1		
knowing that false statements on this fo	rm are punis	shable by l	law, state t	hat the fac	ets containe	ed herein a	re true.
I have probable cause to believe that on	08-29-201	19	, at 14	th St and E	ellefontain	e Av	in
		ate)			(Address)		
Kansas City, Jackson	Missouri	Michael	D. Wilson				
(County)				(Name of O	ffender(s))		
B/M 02-28-1988			commi	tted one o	r more crir	ninal offen	se(s).
(Description of Identi	ty)						
On 08-29-2019 at approximately 1412 hadispatched to an assist the officer in the aregarding an off-duty Kansas City Missofired at his location and he needed assist Officer who was placing handcuffs on a the leg. Two other shooting victims were another was pronounced deceased at the	rs, Officers farea of 1400 ouri Police O ance. As res black male l	Bellefonta officer who sponding o ying (susp	aine, Kans had radio officers arr pect) in the	as City, Ja ed dispato ived on sc middle of	ckson Couch advising ene they co	shots had lontacted the had been	ouri been e n shot in
While processing the crime scene detection Bellefontaine facing northbound. The dedriver's side door. Additionally a defect circular defect on the exterior of the from 14 th St and Bellefontaine four (4) 45 calishell casings a Glock, 45 caliber handgur three (3) 40 caliber spent shell casings were located east of 14 th St and Bellefon casings directly north east of 14 th St and circular defects to his body.	tectives observe was observe t passenger of ber spent sho n was found ere laying in taine along t	erved the Med in the indoor. To the ell casings lying on the the street the south s	Malibu to laterior pass he north of were loca he ground f. Six (6) a ide in the	have a circle senger side of the Malib ted on the East aloudditional 4 grass. Nor	e door with to along the ground. N ng the north to caliber s th of the 45	a correspondent in the rear a correspondent side ear the specific side of 14 pent shell of caliber sh	ending e of nt 45 4 th St. casings
witness had met up at a store on Truman to E 14 th Street/Bellefontaine Avenue, we exited the vehicle at which time, an unknowhicle and began running away and the	tated that he Road. He here the two nown black r	and the dead agreed live in a tomale began turned an	eceased vi to give the cent. Upon a shooting ad fired at	ctim, Muhe two a rid arrival at at him. T	nammad, ar le in his wh that interse he female j o was still	nite Chevy ection Muha jumped fro sitting in th	Malibu ammad m his ne

PROBABLE CAUSE STATEMENT FORM

CRN KC19065657

he stopped and looked back up, bserved a police officer moving toward the suspect, who was now on the ground. The police officer kicked the handgun out of the suspect's hand, at which time the suspect began pleading for help from the officer. also noted that he had seen a dark color SUV, which had been parked facing westbound, take off westbound from the scene after the shooting. who was not hit by gunfire, responded to Police Headquarters to provide a Another victim of the shooting, stated she lives with her fiancé, the deceased victim, in a tent just north of the intersection of 14 St. and Bellefontaine Ave. On 08-29-2019 she was with the victim eating lunch at the Wendy's on Truman Rd. when they decided to walk to the Cash America Pawn Shop. While they were walking there, a friend of the victim's drove by in a white vehicle and stopped to talk to them. The victim's friend agreed to drive them to a scrap yard so they could sell some scrap. She got in the back seat of the white vehicle and the victim got in the front passenger seat. They drove to their tent in order to get the scrap to sell. Once they got to the intersection of 14 St. and Bellefontaine Ave., the victim got out of the white vehicle and walked towards their tent. She got out of the white vehicle to help the victim and observed a black male wearing a dark colored hat, the suspect; begin shooting at the victim with a handgun. The suspect was standing just west of the intersection and was near a dark colored SUV. The suspect then turned and began shooting at her and then shot at the victim's friend who was still in the white vehicle. She saw a police officer shooting at the suspect and ran towards the police officer. She observed the back window on the dark SUV get hit with the officer's gunfire and shatter. The dark SUV drove away and other police officers arrived on scene. was shown a photo line-up of 5 similar looking males. She identified the suspect as the person she saw shoot the victim and the person she saw getting shot by

During an area canvas multiple eye-witnesses were contacted and stated the following:

Witness was working in the area of 14th St and Illinois Ave. for a private utility company that employs an off-duty police officer to ensure the security of the workers while they are working on the utilities. While waiting for a delivery the group of workers and the off-duty officer were congregated just south of 14th St and Illinois Ave on the west side of the street when observed a black GMC Terrain travel northbound on Bellefontaine and turn west on 14th St. Approximately 30-60 seconds later he heard a loud bang from the area of 14th St and Bellefontaine which is located one block to the west. As he looked that direction he observed a black male with a gun in his right hand leaning over the hood of a white Chevy Malibu shooting in a northeastern direction. As looked that direction he also noticed a white female standing near the side of the Malibu think the black male was shooting at her. While watching the black male shooting moving around making the gun the Off-Duty Officer who was in a full uniform pulled his gun and moved towards the direction of the black male, firing two shots towards him. observed the black male with the gun begin to back up towards the black GMC Terrain which was now backing up eastbound towards the black male. The black male continued to fire his gun towards the Malibu. The Off-Duty Officer continued walking towards the black male firing his gun shooting multiple times towards the black male causing him to fall to the ground. While that was happening the white Chevy Malibu rolled backwards and stopped on the south side of the 14th St and Bellefontaine intersection causing to lose his view of the black male on the ground. then heard the officer yelling multiple times at the black male to drop the gun at which time sees the officer shoot again towards the black male. At this point observed the black GMC Terrain speed off leaving the black male in the street and leaving the area. I then hears the officer telling the occupant of the White Chevy Malibu to stay in the car and

the officer.

PROBABLE CAUSE STATEMENT FORM

CRN	KC19065657	
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arriving and trans	s additional police cars arriving on so sporting multiple people from the so e was an open lot with a clear view of	ene. advised that the ar	rea between 14 th St and Illinois
sewer service. At they worked. He officer when he he Bellefontaine Av handgun into a g shooting at due to parked near the g south on Bellefonshorts ran from that as she ran away, at the suspect. The stripe down the search exited the 14 St. to Agnes wit to shatter. The tried to calm the	ed he works for Kissick Construction off duty police officer was working was standing on the west side of Illineard approximately two gunshots from the end of the observed a younger black rass area just north of the intersection of some trees around the grass area. That vehicle, which was be nearly as the suspect was shoot the white Chevrolet towards the grass. The police officer who was working the suspect was hit by the officer's guide backed up east on 14 St. to the intersection black SUV. He saw the police office where it traveled south. Gunfire from police officer ran to the suspect and white female down while standing was unable to identify the suspect in a photon of the suspect in	g security for him and the nois Ave. just south of the om the west. He looked to ke male wearing a blue had not have the looked to the also observed a white Cheing driven by an older bluing. A slim white female was area. The suspect then be a foff duty ran towards the infire and fell to the ground the section. A heavy set blue and quickly got back instant the police officer hit the kicked the gun away from with the suspect. Other police	other construction workers while a 14 St. talking to the police of the intersection of 14 St. and and blue shirt shooting a se to observe who the suspect was chevrolet Malibu or Impala ack male, slowly backed up wearing a gray tank top and blue egan shooting at the white female intersection and began shooting d. A black SUV with a gold ack male with dread locks and a side the SUV and drove it west on back window of the SUV causing a the suspect. The police officer
The suspect was	transported to an area hospital with	a gunshot wound to his leg	g.
	defendant poses a danger to the cone which was unprovoked by the victi		erson due to violent nature of
Printed Name	Det. Daniel W. Frazier #5180	Signature /S/Daniel	W. Frazier #5180
The Court finds	probable cause and directs the issua	nce of a warrant this	day of
		Judge	
	Circuit Court of	County, State	e of Missouri.