

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

POLICE NO. :	KC19074215
PROSECUTOR NO. :	095455329
OCN:	HR007079

STATE OF MISSOURI,

PLAINTIFF,)

VS.

DANIEL A BIGGE

1939 E 71st Terr.

Kansas City, MO 64132

DOB: 06/26/1996

Race/Sex: B/M

DEFENDANT.)

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 September 27, 2019, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to John T. Wilson III caused the death of John T. Wilson 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 September 27, 2019, in the County of Jackson, State of 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

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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.

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/ Lauren Whiston
Lauren Whiston (#66185)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Fl
Kansas City, MO 64106
(816) 881-4312
lwhiston2@jacksongov.org

WITNESSES:

1. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
2. PO A. Crosby, 1125 Locust, Kansas City, MO 64106
3. DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127
4. DET Rodney E. Haney, 1125 Locust, Kansas City, MO 64106
5. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
6. PO Jacob I. Ramsey, 1125 Locust, Kansas City, MO 64106
7. DET Christopher S. Smith, 1125 Locust, Kansas City, MO 64106
8. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

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9. John T Wilson II, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO
64106

PROBABLE CAUSE STATEMENT FORM

Date: 10-03-2019

CRN: KC19074215

I, Detective Alane Booth #4105

(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 09/27/2019, at 1637 Citadel Dr, Apt #102 in
(Date) (Address)

Kansas City, Jackson Missouri Daniel A. Bigge
(County) (Name of Offender(s))

B/M, 06/26/1996, 6'1" 145 lbs BLK/BRO committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 9/28/19 at approximately 0037 hours, members of the Kansas City Missouri Police Department were dispatched to 1637 Citadel Dr. #102, Kansas City, Jackson County, MO, 64132 in regard to a nature unknown. Upon arrival, officers made contact with the adult resident who advised he had just arrived home and discovered his adult son deceased on his bedroom floor, who also resided at the apartment. There was no indication of forced entry. The death is being investigated as a homicide. Several 9 MM spent shell casings and two live 9 MM rounds were located in the bedroom with the victim. No firearm was located. The victim's cell phone was on the floor next to his hand. The victim's death was determined to be caused by multiple gunshot wounds and the manner of death as homicide by the Jackson County Medical Examiner's Office. CSI processed the residence and collected several items of evidentiary value to include but not limited to swabs, latent print cards, and other trace evidence. One of the bullet defects observed on the victim during the body exam was a single gunshot wound to his head behind his right ear which was documented as back to front right to left. There was apparent corresponding swelling around the victim's left eye and forehead.

A witness advised a detective he was outside in the parking lot associated with the building of 1637 Citadel Dr. on 9/27/19 between 4:00 PM or 5:00 PM. The witness stated that he observed a white SUV pull up in the parking lot and park. The witness described the SUV as a "Jeep or something similar" and that the SUV "was more rounded than a Jeep." The witness observed a male get out of the driver's seat of the vehicle and walk up the sidewalk toward the 1637 building and out of sight. The unknown male was described as a black male, early 20's, with light skin tone, tall, thin, and with a dreads hairstyle, wearing dark clothing. The unknown black male then walked back to the SUV after a short time and left in the vehicle. The white SUV then returned about 30-45 minutes later and parked in the same spot. The same unknown b/m male got out of the SUV and walked down the same sidewalk and out of sight. A short time later, he heard 4 to 5 shots coming from the apartment building, and a few seconds later, the same unknown black male came running down the sidewalk. The witness described the unknown black male was laughing out loud. The unknown black male then entered the white SUV and drove off in an unknown direction.

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On 10/2/19 the case detective spoke with the victim's father who stated he had responded to a residence on 71st Terr., at around dusk on 10/2/19, which is the residence of his son's friend, Daniel Bigge, a b/m. The father intended to ask Daniel if he would be a pall bearer at his son's funeral. The father described Daniel's demeanor was not what he expected, it seemed unemotional, and he asked Daniel if he knew. Daniel stated, "No." The father advised his son was dead, and Daniel then stated he may have seen it on Facebook, but the father noticed his reaction was still unemotional considering he believed Daniel to be friends with his son. The father stated he also saw Daniel had a handgun tucked under his right arm pit. There was no holster. The father asked what he had a gun for, and Daniel stated it was for protection. The father observed Daniel and his grandmother, who are the sole residents, also talking behind the front door, which struck him as peculiar as well. The father observed Daniel to have a hairstyle of short dreads and to be wearing glasses. The father observed a white KIA SUV in the driveway of the residence. The father left the property and then responded to the area of 1637 Citadel Dr. The father has not been staying at the apartment since the homicide. The father then had contact with the aforementioned witness. The witness advised the father he believed the person who killed his son was familiar to the victim. The witness advised the father he observed a tall lanky b/m with a lighter complexion leaving the area after the gun shots. The witness stated the male had short dreads and looked "geeky." The father immediately thought of Daniel as the description made him think of Daniel and how he appeared having just seen him at his residence. The father then stated to the witness, "Don't tell me he had glasses." The witness stated, "Yes, he did." The witness also stated the unknown male was driving a white SUV.

During the investigative process and search for surveillance video of the surrounding area of 1637 Citadel Dr., surveillance video captured a white KIA Sorento SUV with unknown plates traveling west on 63rd from Citadel Dr. on 9/27/19 at 4:16PM. Additional video surveillance with the time stamps of 9/27/19 4:17PM captured a vehicle similar to a white KIA Sorenta arriving in the area in or around US Bank located at 63rd and Troost Av.

A search of the Tiburon report writing system and subsequent additional data base searches resulted in the discovery of a b/m, Daniel A. Bigge, bm, 6/26/96, 6'1", 145lbs, who was found to be associated with an elderly woman, to the address of 1939 E. 71st Terr., and registered to a white 2014 KIA Sorento utility vehicle with Missouri license plates, GA4D5Z, VIN 5XYKT3A6XEG444573.

The father was shown a six person photo line-up of six black males similar in appearance which included the most recent photo of Daniel A. Bigge, b/m, 6/26/96, but not an accurate reflection of his images observed in current social media posts. The father identified Daniel A. Bigge without hesitation as the male who was at the address on E. 71st Terr. on the evening of 10/1/19 who had possession of a handgun.

Public Social media images associated to Daniel A. Bigge depict Bigge with a handgun within a store which apparently sells camouflage and tactical gear. Bigge is observed wearing a camouflage vest in the photo of himself as he is pointing a handgun at the camera. In the social images Bigge is wearing eyeglasses and his hairstyle is in short dreads. The social media page appears active as posts made on the public page indicate the posts are in 2019 and some as recent at September 17th of 2019. A specific public Facebook post associated to Bigge's account dated September 14 at 02:46 AM stated, "I'm about to go to jail." It should be noted Bigge has no record of being arrested from 9/14/19 to 10/2/19.

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On 10/2/19 investigators were able to gain access to the victim's locked Apple I Phone. Communication between a contact number to "Daniel" and the victim appears to be the last communication with the victim. The communication between the victim and "Daniel" indicated time stamps of 9/27/19 at 3:04 PM and 3:47 PM. There was no other apparent outgoing communication upon the initial search of the victim's cell data. A search of a database confirmed the number associated to the contact "Daniel" in the victim's phone is registered to "Daniel Bigge, 1939 E 71st Terr, Kansas City, MO, 64132."

It should also be noted Daniel A. Bigge, b/m, 6/26/96, was arrested in regard to Possession of Drugs in 2017, and was in possession of a 9MM handgun at the time of his arrest, CRN 17-105232. The gun was recovered at the time of the arrest, but was eventually released back to Daniel A. Bigge on 3/1/18, as the owner of the firearm. The release documentation included Bigge having his photo taken with the firearm at the time he took possession of the handgun from KCPD personnel from the Property and Evidence Section.

On 10/2/19 a Search Warrant was executed on 1939 E 71st Terr, Kansas City, Missouri, and Daniel Bigge and his brother David Bigge, and their grandmother, the registered owner of the white KIA were home at the time of the execution. Two 9MM handguns were located inside the residence, one in Daniel Bigge's bedroom, a 9MM Smith and Wesson, on top of his bed, and the other in Bigge's older brother's bedroom. Bigge was observed to have a white phone in his hand upon entry, which he dropped prior to being placed in custody.

Bigge's grandmother was interviewed immediately after the Search Warrant was executed on the residence. She stated she only allows Daniel Bigge, her grandson, to borrow her white KIA SUV, but not his older half brother, who was observed to have a different hairstyle and a darker complexion than Daniel. She could not recall if Daniel had borrowed her vehicle on Friday, 9/27/19. The grandmother stated if Bigge borrows her vehicle he must get the keys from her directly. She stated Bigge has no mental health issues.

As Daniel A. Bigge, b/m, 6/26/96, was being escorted to the patrol wagon after the execution of the search warrant, his brother could be heard yelling at Daniel, "Don't say shit. Ask for a lawyer." After Bigge was pre-booked on an Investigative HOLD to obtain a current booking photo, he was transported to 1125 Locust St. to be interviewed. He was read the Miranda Waiver form and stated he understood his rights. Bigge stated he has no mental health issues and does not do drugs but smokes marijuana on occasion. Bigge confirmed only he is allowed to borrow his mother's white KIA SUV, not his brother. Bigge confirmed his current cell phone number to be the same aforementioned number previously described in the victim's cell phone records on 9/27/19. Bigge confirmed the white Apple I-phone 6 he had in his hand initially when officers made entry to his residence was his personal cell phone and he pays the bill and it's registered to him. Bigge stated he banks at US Bank located at 63rd and Troost Av, Kansas City, MO. Bigge confirmed the 9MM handgun which would've been located in his bedroom belonged to him. He stated he purchased the handgun several years ago for approximately \$600-\$700 from the Bullet Hole. Bigge refused to provide consent to obtain a DNA buccal swab and denied consent to search his cell phone but did provide the passcode to his phone. Bigge stated he became aware of the victim's death from the news, and he stated he knew the victim was found around midnight but didn't know what day. Bigge denied being at the victim's residence on the day he was killed or having any recent contact with the victim. Bigge provided several different time frames of which he had last seen or spoken to the victim but the closest time frame he stated he had contact with the victim was approximately the middle of September 2019, and approximately one week before the date of this arrest (approximately 9/23 or 9/24). He also stated he hadn't

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hung out with the victim for months. During the interview process which lasted for several hours, Bigge made such statements as "How much time am I looking at if John (victim) asked me to kill him." Bigge stated the victim had asked him several times over the course of several months to kill him and he believed the victim was serious. Bigge was asked how he felt afterwards. He replied, "Lifted." But when subsequently asked directly if he shot the victim, he stated, "No."

On 10/3/19 a Forensic Specialist at the Firearms Section of the Kansas City Regional Crime Lab confirmed the 9mm Luger cartridge cases collected from the scene at 1637 Citadel Dr. #102, were confirmed to have been fired from the 9MM Smith & Wesson firearm recovered from 1939 E 71st Terr., specifically the bedroom associated to Daniel Bigge.

Printed Name /s/ Det. Alane Booth #4105 Signature _____

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

Judge

Circuit Court of _____ County, State of Missouri.