

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

POLICE NO. :	KC20048015
PROSECUTOR NO. :	095459979
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
ISAAC L KNIGHTEN	)	
AKA ISSAC KNIGHTEN	)	
4327 N. 106th Ter	)	CASE NO. 2016-CR
Kansas City, KS 66109	)	DIVISION
DOB: 06/18/1980	)	
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 July 19, 2020, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Jayvon Mccray 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.

State vs. Isaac L Knighten

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 19, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of [name of felony] 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. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20173899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 19, 2020, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED] a child less than seventeen years of age, by possessing a firearm and shooting it near [REDACTED]

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 IV. Armed Criminal Action (571.015-001Y19755299.0)

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 19, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of endangering the welfare of a child charged in Count Three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of [name of felony] 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. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about July 19, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed a handgun, a firearm, and on March 28, 2008, the defendant was convicted of the felony of Possession with intent to distribute 5 grams or more of cocaine base in the U.S. District Court of Western Missouri.

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.

State vs. Isaac L Knighten

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Kelsey L. Blackwell

Kelsey L. Blackwell (#63713)
Assistant Prosecuting Attorney
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WITNESSES:

1. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
2. [REDACTED], Office, 415 E 12th St, Floor 11, 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. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
6. DET Kari E. Mutschler, 1125 Locust, Kansas City, MO 64106
7. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
8. DET Christopher S Smith, 1125 Locust, Kansas City, MO 64106
9. PO Jacob R. Walton, 1125 Locust, Kansas City, MO 64106
10. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07-20-2020

CRN: 20-48015

I, Detective Jeremy D. Wells #5015 Kansas City, Missouri Police Department
(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 07-19-2020, at 8505 Woodland Ave in
(Date) (Address)

Kansas City, JACKSON Missouri Isacc Knighten
(County) (Name of Offender(s))

B/M, 06-18-1980 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07-19-2020 at approximately 1455 Hours, Officers of the Kansas City Missouri Police Department were dispatched to the area of 85th and Woodland Ave Kansas City, Jackson County, MO on a reported shooting. Upon arrival officers located the victim lying in the parking lot of the business located at 8505 Woodland Ave suffering from apparent trauma. KCFD EMS responded and declared the victim deceased. The suspect was located and arrested in regard to this incident a short time after the homicide at a nearby location.

Witness #1, stated she and the victim (her boyfriend) went to the gas station at E 85th Street/Woodland Avenue in a green, four door, Acura sedan to purchase a beer. Witness #1 stated as the suspect (identified as **Issac Knighten B/M, 06-18-1980**) was walking away from his vehicle, a white Cadillac SUV, which was parked at a gas pump towards the store's front entrance door, he looked at the victim in a funny or a strange way. Witness #1 described **Knighten** as a black male with a beer belly and beard wearing a white tank top. Witness #1 stated the victim took offense to it and he and **Knighten** exchanged words. Witness #1 stated **Knighten** continued into the store. Witness #1 stated the victim placed his handgun into his pants pocket, which he always does prior to going into any store. Witness #1 stated the victim then walked into the store where **Knighten** was. Witness #1 stated she observed **Knighten** and the victim inside the store "nose to nose". Witness #1 stated she got out of the car to diffuse the situation. Witness #1 stated as **Knighten** walked out of the store he brushed against her. Witness #1 stated she ignored it, however, the victim walked out of the store and yelled at **Knighten** for having contact with Witness #1. She stated the victim pulled out his gun from his pocket and he and **Knighten** immediately started fighting over the gun. Witness #1 stated the victim yelled at her to grab his gun. Witness #1 stated she feared the gun would go off and hurt someone so she took the gun away from the victim and **Knighten**. Witness #1 stated she placed the gun into her waistband and walked towards the white Cadillac where there was a different black female (identified as **Knighten's** wife) yelling. Witness #1 stated she placed her hands in the air and walked toward the female and asked her to help separate the men. Witness #1 stated she heard **Knighten** yell for the black female to get his gun. Witness #1 stated she

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observed the female digging in her purse and inside the white Cadillac. Witness #1 stated she tried to separate the victim and **Knighten** multiple times. Witness #1 stated at some point **Knighten** struck the victim in the face and he was bleeding. Witness #1 eventually gave the victim his gun back and he placed it in his pocket. Witness #1 stated she observed a young child walking in the parking lot by himself and heard the black female yelling it was her son. Witness #1 stated suddenly there were two more unidentified black males in the parking lot confronting the victim. Witness #1 described one of the black males to be wearing a blue t-shirt and the other black male to have no shirt on but an apparent visible knot on his head. Witness #1 stated the black male with the blue t-shirt picked up the young child in the parking lot and was holding onto him with one arm and had a gun in his other hand. Witness #1 stated **Knighten** also had a gun at this point, but was unsure where and when he got it. Witness #1 stated **Knighten** and the other two black males surrounded them by their vehicle. Witness #1 stated **Knighten** then shot the victim three times. While being transported to 1125 Locust to provide her statement to detectives, Witness #1 observed the suspect in the custody of officers at a nearby location and told the transporting officer "That's the guy who shot my boyfriend"!

Witness #2, who had been detained by members of the Kansas City Missouri Police Department on 7/19/20 with **Knighten**, at 85th St. and Hickman Mills Dr, approximately one mile east of the homicide scene in a white Cadillac Escalade with **Knighten**. Witness #2 was read the Miranda Waiver form and agreed to provide a statement. Witness #2 stated she, **Knighten**, and **Knighten's** five biological minor children, ranging in ages from 3-13 years of age, were in the Escalade, driven by **Knighten**. The two youngest children in the Escalade, who are 3 and 4 years of age, are children she has in common with **Knighten**. Witness #2 stated they had just left a relative's house nearby and arrived at the gas pumps at the gas station (8505 Woodland Ave). **Knighten** parked at the gas pumps on the north side of the lot facing towards 85th St. The rear of the vehicle was facing to the south towards the convenience store. Witness #2 stated shortly after **Knighten** exited the vehicle she heard arguing, and then looked in the rear view mirror of the Escalade, and observed **Knighten** in an apparent argument with an unknown black male and an unknown female near the store. Witness #2 then exited the Escalade, and stated the unknown male's apparent girlfriend alerted her that she had her boyfriend's gun, and was encouraging them to leave. Witness #2 stated both she and the unknown male's apparent girlfriend were attempting to intervene to diffuse the situation between **Knighten** and the unknown male and trying to separate the two. The unknown male then followed **Knighten** back to the driver's side of the Escalade near the pumps, the disturbance continued between **Knighten** and the unknown male, and Witness #2 observed the unknown female then return the handgun back to the unknown male. Witness #2 also had yelled for all of the children in the Escalade to run and get away from the area. The children then fled from the vehicle, southbound, from the area of the Escalade, through the parking lot. Witness #2 stated the disturbance between **Knighten** and the unknown male then moved to the area by the unknown male's green car, (green Acura), near the store. **Knighten** then left the area of the unknown male's vehicle, walked back towards the Escalade at the pumps, and yelled at the Witness #2 to get the gun. Witness #2 stated she advised **Knighten** she didn't have the gun. Witness #2 advised the investigator she was unaware of a gun being in the Escalade. Witness #2 stated **Knighten** returned to the area of the unknown male's car, where some of **Knighten's** cousins had gathered as well. Witness #2 assumed the children ran back to the nearby relative's house and alerted them to the conflict at the gas station. The Witness stated she stayed near the Escalade, and heard gunfire, but claimed to not have witnessed the shooting. Witness #2 stated after the gunfire, **Knighten** returned to the Escalade, but she did not observe a gun in his possession. Witness #2 stated the three year old had returned to the Escalade, but she was unaware how the toddler arrived back to the parking lot. **Knighten** then drove Witness #2 and their 3 year

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old away from the gas station, eastbound, where the vehicle was subsequently stopped by police. Witness #2 stated she asked **Knighten** what happened as they drove away, and he told her to be quiet. Witness #2 identified a single color photo of **Isaac Knighten, B/M, 6/18/80**. Witness #2 was shown several color screenshots of the surveillance video and identified a male who was in care control and custody of her three year old as one of Isaac's cousins. Witness #2 identified a single color photo of that adult male as well. Witness #2 was unaware Isaac's cousin had escorted her three year old back to the area of the scene prior to the shooting. Witness #2 stated she legally owns a 9MM handgun, which she still believed is stored in a box in her residence in Kansas City, KS, where she recently moved. The investigator advised Witness #2 that the video surveillance indicated **Knighten** retrieved a handgun from the Escalade and discharged the handgun which caused the death of the unknown male. Witness #2 agreed to notify the investigator if her legal firearm was still secured at her residence, as she did not know **Knighten** had a firearm in the Escalade.

Knighten was located and arrested in regard to this offense in the described White Cadillac Escalade and was transported to 1125 Locust. **Knighten** was placed into a video and audio recorded interview room on the 6th Floor. **Knighten** was read his Miranda Rights aloud and he advised he understood his rights. **Knighten** advised he was with his wife and five children and had just come from his mother's residence south of the business address. **Knighten** stated he pulled up to the pumps to get gas at the business facing 85th Street. **Knighten** stated he exited his Cadillac Escalade and began to walk to the front of the business when the victim began to start a verbal confrontation with him as he walked past the victim's vehicle. **Knighten** stated he entered the business when the victim followed him into the store still verbally confronting him. **Knighten** advised he walked out of the business followed closely by the victim. **Knighten** advised he observed the victim reach into his pocket and produce a handgun in his right hand. The two began to "fight" for control of the firearm when it fell onto the ground and at some point the magazine came out. **Knighten** advised the witness then picked up the victim's firearm off the ground and re-inserted the magazine. **Knighten** stated he walked back into the store and told the clerk the victim had just confronted him with a firearm. He then exited the store again and was walking back to his vehicle when Witness #1 began waving the victim's firearm around in his direction. The victim and Witness #1 then responded back to their vehicle. **Knighten** explained during this altercation, his children had run back to his mother's residence which is right down the street from the store. As the victim and Witness #1 were by their vehicle, one of **Knighten's** cousins approached them with **Knighten's** three year old son. **Knighten** advised the victim and Witness #1 began confronting his cousin. **Knighten** stated he then retrieved his wife's firearm from his Escalade and walked over to where the victim and Witness #1 were standing. He observed Witness #1 still with the victim's firearm. **Knighten** advised the victim appeared to be reaching for the firearm at which time he shot the victim several times. **Knighten** stated after the shooting he walked back to his Escalade and left the scene with his wife and three year old son east on 85th Street. **Knighten** stated he did not know where the firearm he used was and advised he knows it's not in the Escalade. He stated he did not know the victim and had never seen him before.

While detectives were at the crime scene, several surveillance cameras were observed affixed to the exterior of the building. A Consent to Search was obtained from the store manager to recover the surveillance video from the interior and exterior cameras. A review of the video shows the victim and a female witness at the store in the victim's vehicle. A short time later the suspect arrived in his vehicle, along with a female witness and several small children. As the suspect walks across the parking lot towards the front door of the business, the

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suspect appears to be looking towards the victim and/or the victim's vehicle. The suspect stops short of the front door of the business and appears to engage in a brief dialogue before continuing inside the store. While the suspect is inside the store, the victim exits his vehicle and walks inside the store. The suspect and victim have a brief physical altercation in the doorway. The suspect leaves the store and begins walking back to his vehicle. The victim follows him outside where another physical altercation takes place. By this time, the female witness who was seated in the victim's vehicle walks towards the altercation. The victim can be seen removing a handgun from his pocket, while the suspect is simultaneously grabbing the victim's hands, as another physical altercation begins. The victim's hands with the handgun, and the suspect's hands are above their heads with the handgun pointed up towards the sky. The female witness who was with the victim then grabs towards the handgun and the gun falls on the ground. The victim and suspect continue fighting as the female witness retrieves the handgun from the ground. The female witness then engages the female who is seated in the suspect's vehicle. The female witness from the suspect vehicle then exits and the two females begin trying to physically separate the victim and suspect from each other. Five small children can be seen exiting the suspect vehicle and running southbound out of camera view. Two unknown adult males then run into camera view from the south, one of which is carrying a handgun in his hand, as well as one of the smaller children from the suspect vehicle. The victim and female witness that he was associated with walk back to his vehicle and are on the passenger side talking with one of the two unknown adult males. The suspect appears to reach into his vehicle and retrieve a handgun. He then walks across the parking lot to the passenger side of the victim's vehicle, where his 3 year old son, I.K. is located; where the victim, female witness, and the two unknown adult males are now congregated. The suspect is then standing behind the two other males engaging the victim verbally. The victim does not appear to have a weapon in his hands, nor does the female witness who had collected the handgun from the ground. The suspect can be seen attempting to strike the victim with his left hand, while holding the handgun in his right hand. The victim can be seen grabbing his mouth with both hands as he takes a step backwards. The small child who is in the group starts to run away back towards the suspect vehicle. The suspect then raises the handgun and begins shooting at the victim as he is standing behind the two other adult males. After the victim falls to the ground and the group begins to run away, the suspect continues shooting at the victim. The suspect then walks back across the parking lot towards his vehicle. By this time the small child and female passenger are back seated in the vehicle. The suspect can be seen placing the handgun in his shorts pocket as he is walking to the vehicle. The suspect then drives away from the scene eastbound. The two aforementioned unknown males walk around the parking lot briefly before walking away southbound out of camera view.

Knighten is a convicted felon for possession of cocaine with intent to distribute. The surveillance video recovered from the business where the incident occurred and is consistent with the information provided by Witness #1 during her statement.

Printed Name Jeremy D. Wells Signature /s/ Det. Jeremy D. Wells #5015

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

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Judge

Circuit Court of _____ County, State of Missouri.