


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>POLICE NO. :</b>	20-048188
<b>PROSECUTOR NO. :</b>	095460094
<b>OCN:</b>	qo003747

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>RYAN D. SMITH</b>	)	
<b>3605 S Greenwich Lane</b>	)	<b>CASE NO. 2016-CR</b>
<b>Independence, MO 64055</b>	)	<b>DIVISION</b>
<b>DOB: 09/18/1978</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT  
WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y19840902.0)**

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 26, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Daina M. Smith caused the death of Daina M. Smith by shooting her .

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 July 26, 2020, in the County of Jackson, State of

**State vs. Ryan D. Smith**

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 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/ Michael J. Hunt  
Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. PO Brian Hanrahan, 223 N. Memorial Drive, Independence, MO 64050
3. PO Galen McGinley, 223 N. Memorial Drive, Independence, MO 64050
4. CST Jason Myers, 223 N. Memorial Drive, Independence, MO 64050
5. Daina M. Smith, 3608 South Greenwich Lane, Independence, MO 64055

## PROBABLE CAUSE STATEMENT

Date: 7/27/2020

Report #: 2020-48188

I, Christopher Burris, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 7/26/2020, at approximately 2212 hours, Ryan D. Smith, (Race- White, Sex- Male, DOB- 09/18/1978, Address-3605 South Greenwich Lane, Independence, MO 64055, [REDACTED]), committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 07/26/2020 at approximately 2219 hours, officers with Independence, Missouri Police Department were dispatched to 3605 South Greenwich Lane on a reported nature unknown call. Independence, Missouri Police dispatch received multiple calls stating that a male at the residence shot his wife.

Upon the arrival of officers, a black Jeep Wrangler backed out of a driveway near the address and began to travel southbound on Greenwich Lane towards 37th Street. Several officers were on foot approaching the residence when the Jeep left. Officer Nicholas Dorman heard an unknown male yell "that man shot my mom" as he pointed towards the Jeep. Officers attempted a vehicle stop on the Jeep and the Jeep's driver failed to yield, continuing southbound on Greenwich Lane. As the vehicle passed 37th Street, the driver and sole occupant pulled over in front of 3724 South Greenwich Lane. Officers conducted a high risk car stop and were able to take the driver identified as Ryan D. Smith into custody without further incident.

Independence, Missouri Police Officer Brian Hanrahan asked Smith if there was anyone at his residence that needed medical attention due to the nature of the call. Smith told Officers "yes, my wife needs help right now, please." Officer Hanrahan asked Smith what happened to his wife and Smith stated that "She needs an ambulance. She got shot by a stranger."

Several Officers responded to 3605 South Greenwich Lane to check the well-being of Smith's wife, "D.S." (herein referred to as the deceased or decedent). Once at the residence, Officers observed the front entry door open with the glass storm door shut. Officers entered the residence and located a white female deceased. The decedent was found laying on the couch on the northwest corner of the living room with an apparent gunshot wound to the head. The decedent was nude from the waist down. Officers cleared the residence for any additional persons and no one else was located. The scene was secured and investigators were summoned.

Investigators interviewed the decedent's sons, [REDACTED] and [REDACTED] at police headquarters. [REDACTED] told investigators that about 2220 hours, he received a call from a family friend, [REDACTED] who told him that Smith called him and told him something bad happened to his mom. [REDACTED] advised he tried to call his mother's cell phone several times and did not receive an answer. [REDACTED] advised he then called Smith who immediately answered and told [REDACTED], "I shot your mom in the head. I need help." [REDACTED] advised he hung up on Smith and kept trying to call his mom to no avail, while his wife called 9-1-1. Investigators learned from [REDACTED] and his wife that the decedent was unhappy with Smith due to him being what they described as a severe alcoholic. [REDACTED] and his wife reported that the decedent wanted a divorce from Smith if he did not quit drinking. [REDACTED] reported he knew Smith had a .45 caliber pistol, which he believed to be a Smith & Wesson.

Detective Chris Burris spoke to [REDACTED] via phone as he was an over the road truck driver and unavailable at the time for a formal interview. [REDACTED] stated that he received a phone call from Smith who he described as a really bad alcoholic. [REDACTED] said that Smith told him "I just killed my wife" and "I fucked up" repeatedly, before hanging up on him. Stevens advised he called the police to report the incident and then called [REDACTED] to tell him to check on his mother.

A search warrant was applied for and obtained through the 16th Judicial Circuit Court of Jackson County, Missouri. The search warrant was executed at the 3605 South Greenwhich Lane. Among other evidence, a .45 caliber Kimber pistol was located sitting on the coffee table roughly three to five feet from the decedent. A spent .45 caliber shell casing was located behind the couch. There was no visibly apparent blood spatter on the firearm.

Information was received by Independence Police Department Detention Unit personnel that Smith claimed he was suicidal and was traumatized after watching his wife kill herself.

An initial exam of the decedent by the Jackson County Medical Examiner's office revealed the decedent's injury was not a contact wound and it was estimated that there was an approximated distance of one foot between the entry wound from the end of the firearm. The entry wound was on the left side of the decedent's face. There was no exit wound. The bullet appeared to travel from left to right in a slightly downward fashion from the entry wound, before finally coming to rest behind the lower portion of the decedent's right ear. The decedent's death was classified as a homicide.

In subsequent follow-up with [REDACTED], Detective Burris asked him if his mother was left handed or right handed. Detective Burris also asked [REDACTED] if his mother had ever been suicidal or threatened suicide. [REDACTED] told Detective Burris that his mother was right handed and she had never been suicidal.

On 07/27/2020 at about 1305 hours, an interview was attempted with Smith after he was read his Miranda rights. Upon Detectives Burris and Scott McKee questioning Smith advised he did not wish to speak about the incident. Questioning was ceased.

At about 1345 hours, Detective McKee spoke with [REDACTED] via phone as she lived out of state in Nevada. [REDACTED] spoke about an incident about that occurred in 2005 or 2006, where Smith became intoxicated. [REDACTED] reported she was present at Smith and the decedent's house in Blue Springs, Missouri drinking and listening to music. [REDACTED] said Smith went to the bedroom and came back with wearing camouflage and holding pistols in each hand. [REDACTED] said Smith began to fire the pistols which almost hit their children who were present. [REDACTED] said there was no apparent provocation to lead Smith to do this. [REDACTED] advised she had been in contact with the decedent within the past weeks about her wanting to approach Smith about filing for divorce.

A criminal history check of Smith revealed one prior arrest on 2006 for 2nd degree domestic assault and unlawful use of a weapon (0616CR0150701). Smith was convicted in 2007 of unlawful use of a weapon for the same case and sentenced to probation on 03/30/2007. Further investigation revealed the decedent was the listed victim in that case.

Detective Christopher Burris # 1401

/S/ Christopher Burris

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Print Name

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Signature