


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

POLICE NO. :	KC20049314
PROSECUTOR NO. :	095460084
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
MICHAEL SKINNER)	
6006 149th Terrace)	CASE NO. 2016-CR
Grandview, MO 64030)	DIVISION
DOB: 05/28/1998)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about July 24, 2020, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Chieyene Wallis by shooting her .

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years 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

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571.015.1, RSMo, in that on or about July 24, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first 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 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 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/ Jennifer S Tatum
Jennifer S Tatum (#70789)
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PROBABLE CAUSE STATEMENT FORM

Date: 08/04/2020

CRN: KC20049314

I, Det. Ilinca Rusnac #5741, 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 07/24/2020, at 14412 S US 71 Hwy in
(Date) (Address)

Kansas City, Jackson Missouri Michael P. Skinner
(County) (Name of Offender(s))

B/M; 05/28/1998 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07/24/2020 at 0647 hours, Officers of the Kansas City, Missouri police department were dispatched to "Cloverleaf Apartments" on the reported shooting of a female named "Chiyenne." Upon arrival, officers drove around the apartment complex until they located a female lying in the grass by 14412 S US 71 Hwy. The female, later identified as Chiyenne **Wallis**, was suffering from gunshot wounds and was transported to Research Hospital by Grandview Fire/Ems. She was pronounced deceased at the hospital at 0926 hours. The Jackson County Medical Examiner's Office ruled the death a homicide.

Witness ■ stated that she had been residing in at 14414 S US 71 Hwy #202 with her four children for a little over a week. She advised that the apartment had been vacant for a while and had no place to go, which is why she had been staying there. She explained that she'd known **Wallis** for several months from being around each other at the apartment complex and also staying in different vacant apartments. ■ stated that **Wallis** had knocked on her apartment door approximately two or three days prior to 07/24 and asked if she could stay there awhile, to which ■ agreed.

■ advised that on the morning of 07/24/2020 sometime around 0300 hours, she had sent her daughter to go look for her brother, who was somewhere around the apartment complex. She then left her apartment and went looking for her son herself while **Wallis** remained inside the apartment. When she returned with both of her children a short time later, she found **Skinner** inside of her apartment talking to **Wallis**. ■ was familiar with **Skinner** due to he being around the apartments often, knew him to sell drugs and recalled him robbing someone inside a different apartment months prior while she was inside said apartment. ■ stated that they all spent some time together and observed **Skinner** to be drinking a pink liquor out of a clear glass bottle throughout the night. At some point, **Skinner** and **Wallis** went into one of the bedrooms and it appeared that they were getting ready to have sex. ■ then took her children into a separate bedroom and they all went to bed. Sometime between 0500 and 0600 hours, ■ began hearing **Wallis** screaming for help and calling ■' daughter's name ■S went into the bedroom that **Skinner** and **Wallis** were in and observed the two engaged in a verbal altercation. **Wallis** was upset over the fact that **Skinner** had removed the condom he had been

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wearing during intercourse without telling her. Wallis in return told Skinner that she gave him a sexually transmitted disease. This caused Skinner to become irate. He began telling Wallis that she was going to die that day and was taking turns pointing both of his handguns at her asking which one she wanted him to kill her with. Wallis ran to the opposite bedroom (where [REDACTED] children were) in an attempt to get away but Skinner followed after her. Skinner kept telling Wallis to stop trying to get away and that he was going to "get his boys to come down" as he was banging on the walls, closer to the ceiling. [REDACTED] took that to mean that he was trying to signal to two of his acquaintances who she knows to be staying in one of the apartments on the third floor. Wallis tried to hide behind [REDACTED] and her 13yo daughter but Skinner was able to get to her. He then punched her with a closed fist several times and pistol whipped her [REDACTED] was attempting to get in front of Skinner to calm him down as one of her children opened the front door to the apartment. Wallis was able to run out of the apartment but Skinner followed closely behind. [REDACTED] then began looking for her phone to call 911 when she heard three to four sounds of shots. She then heard Skinner's voice inside the breezeway and attempted to get her children away from windows and onto the ground. Moments later, she heard another two sounds of shots and her children saying that Skinner had killed Wallis.

[REDACTED] packed all of her and her children's things and left the apartment and was able to get a ride to the public library. While there, Skinner called her phone from a Text Now app number and kept asking where she and her family were. She would not give him their location and Skinner eventually told her that as long as they don't say anything, he was going to give them "money and dope."

[REDACTED] added that Skinner kept showing off his guns prior to the altercation that led to the shooting and she believed they were both "Springfield XD .45." She also stated that she recalls him picking up the condom in question and taking it with him prior to leaving the apartment. She also remembered Skinner picking up the bottle of pink liquor he was drinking but could not recall if he took it with him when he exited the apartment.

Witness [REDACTED] stated that she was inside the apartment with her younger siblings and Wallis when her mother asked her to go find her brother. She left the apartment and ran into Skinner inside the building, who asked her if she had seen Wallis. [REDACTED] recognized Skinner from always being at the apartments and told him that Wallis was at her apartment. Skinner told [REDACTED] to go get Wallis but she refused because Wallis was sleeping and continued to walk away. When [REDACTED] returned to her apartment approximately 30 minutes later, she found Wallis to be awake and Skinner inside the apartment. [REDACTED] stated that they all were hanging around together and Skinner was drinking and showing off his two handguns [REDACTED] believed the handguns were a Springfield and a Glock and had seen Skinner carry one of the handguns in his left side shorts pocket and the other one in his right shorts pocket. She stated that the one in the left pocket was sticking out while the one in the right pocket was possibly smaller because it fit in the pocket entirely. CS became bored at one point and took a video of Skinner as they were all hanging out. The video shows Skinner's face, clothing description entirely and what appears to be the grip of a black handgun to be sticking out of his left side cargo shorts' pocket.

Once Skinner and Wallis began doing "grownup things" [REDACTED] and her siblings all went into the bedroom across the hallway and went to sleep. [REDACTED] woke up sometime between 0500 and 0600 hours to Wallis screaming for help and [REDACTED]' name [REDACTED] believed the argument was over Skinner not wearing a condom and Wallis telling him that she had given him a sexually transmitted disease. [REDACTED] stated Skinner was irate and began telling Wallis that he was going to kill her. Wallis attempted to get away from Skinner by hiding running into the bedroom the children were in and hiding behind [REDACTED] and [REDACTED]. Skinner kept on telling the children and family to get out of the way because this did not concern them and he was going to kill

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Wallis. He then reached **Wallis** and punched her several times in the face and head with a closed fist and pistol-whipped her, which caused her to fall. **Skinner** then proceeded to stomp her head three to four times while she was on the ground. He then allowed her to get to her feet, which she did. She ran to the window and began opening it to jump out. As she was doing that, **Skinner** pointed his gun at her and told her to jump and that he was only going to start shooting her once she hit the ground. **Wallis** then gave up on trying to jump and was able to run out of the apartment as the family was trying to distract **Skinner**, who did chase after her only seconds behind.

█ then ran to her front window which looks out into the north courtyard and parking lot. She then saw who she recognized to be **Skinner**, standing in the doorway to the apartment building, shooting several shots at **Wallis**, who was running away in a northeast direction towards building #12. █ saw **Wallis** fall to the ground after the first several shots and called 911. █ then heard **Skinner** back inside the breezeway and going up the stairs before coming back out of the building through the same door together with the two other males a few minutes later. As the males began walking towards their parked vehicle, **Skinner** looked in the direction of **Wallis**, who was on the ground face down but was still trying to move her limbs. **Skinner** walked up close to **Wallis** and shot her again at close range towards her head. **Wallis** became motionless as a result. █ then saw **Skinner** walk back to the car his other two associates were in and get in the front passenger seat before the vehicle drove away.

█ added that after the first round of shots, her 16yo brother ran out of the apartment to try to get to **Wallis** and help as he believed **Skinner** had left the area. As he made it just outside of the front door of the building, he saw **Skinner** shoot **Wallis** in the head from close proximity before running back inside the building.

Witness █ stated that he was inside the same apartment as █ and █ and witnessed the same physical altercation between **Skinner** and **Wallis** as █. When he saw **Wallis** collapse onto the grass after the first round of shots, █ ran outside towards her to help. As he made it out of the building, he saw **Skinner** standing next to **Wallis** and shoot her twice at close range.

On 07/25/2020, █ and █ were interviewed at Police Headquarters. █ stated that on 07/23/2020 he, █ and **Skinner** had been inside █'s apartment (14414 S US 71 Hwy #302) playing video games. █ fell asleep sometime around midnight and woke up several hours later to the sound of four to five gunshots followed by **Skinner** running inside the apartment telling █ and █ to get up that they had to go. █ and **Skinner** then left the apartment together. █ walked out of the building first and walked directly to his parked 2006 silver Pontiac G6 VIN 1G2ZF55B364184997. He got into the driver seat of his vehicle and observed █ walking down the same paved path towards the vehicle while **Skinner** was the third one to walk out. He exited the building and walked at an angle towards building 14412. █ then could no longer see **Skinner** momentarily because a garbage dumpster was in his way and kept telling █ to "come on" and get in the car with him but █ replied that he wanted to see what was going on. █ heard two shots and began backing out of the parking spot. At that time, he saw **Skinner** walking back towards building 14414 as █, who stood in front of the car during the incident, began walking around the building. As █ drove his car to the back entrance of building 14414, he heard █ and **Skinner** yelling for him to stop. █ out from around 14414 and **Skinner** came out the back door of the apartment building. They both then got into █'s vehicle. **Skinner** got in the front passenger seat and █ got into the rear passenger seat, behind **Skinner**. As soon as they got in, █ began shouting at **Skinner** asking him "bro, what the fuck did you just do." **Skinner** replied that he wasn't going to tell them what had taken place and told them to drive.

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█ stated that on 07/23/2020 around midnight, he, █ and Skinner were driving back into Cloverleaf apartments in █ car from a liquor store. Once they drove inside the apartments, they saw the victim walking around. They invited the victim to their apartment to drink and smoke with them and she went. █ stated that the victim was only inside their apartment until approximately 0115 hours before she left alone. █ stated that he was intoxicated and went to sleep shortly after the victim left the apartment. Several hours later, he heard the sound of about three gunshots but didn't think anything of it and went back to sleep. He then woke up several hours later so that he and █ could give a ride to Skinner to his job in St Joseph. █ confirmed that the three walked out of the apartment building in the same order as that provided by █. He stated that █ got into the driver seat of his own car and that he (█) was still standing on the paved path when he saw Skinner begin to walk at an angle. █ claims that he was intoxicated and does not remember seeing what Skinner did or where he went. █ then walked around the building and to the back as Skinner exited the same building through the rear door. The two then got into █'s vehicle and drove away.

All listed witnesses picked Skinner out of photo line-ups.

Video surveillance was obtained from the apartment complex, which corroborated █' statement regarding the two males Skinner walks out of the building with, to include their description and that of their vehicle. The video also captures Wallis running into frame and collapsing on the ground. Wallis remains prone on the ground for approximately two minutes attempting to move her limbs and body. The video then captures what looks to be an extended arm pointing a dark/black handgun in the direction of Wallis' head. The toes of the shoes worn by the individual appear to be light or white in color. The gun then moves slightly backwards and upwards in a motion similar to that of a gun recoiling after it has been fired. At that same time, Wallis' body appears to flinch once and become motionless immediately after. It then shows the listed Pontiac G6 vehicle back out of its parking spot and begin to drive north towards the back of the building.

Printed Name Det. Ilinca Rusnac #5741 Signature /s/Detective Rusnac #5741

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

Judge

Circuit Court of _____ County, State of Missouri.