

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	20-052583
PROSECUTOR NO. :	095460498
OCN:	QO003966

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
IVORY D. ALFORD JR.)	
4707 E. 46th Street)	CASE NO. 2016-CR
Kansas City, MO 64130)	DIVISION
DOB: 12/02/2001)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

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 13, 2020, in the County of Jackson, State of Missouri, Shonay Persinger was killed by being shot as a result of the attempted perpetration of the class B felony of Attempted Robbery in the First Degree under Section 570.023, RSMo committed by the defendant on or about August 13, 2020, in the County of Jackson, State of Missouri.

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. Ivory D. Alford Jr.

Count II. Attempted Robbery - 1st Degree (570.023-001Y20171208.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 13, 2020, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, tried to forcibly steal U.S. Currency in the possession of Shonay Persinger, and such conduct was a substantial step toward the commission of the offense of Robbery in the First Degree, and was done for the purpose of committing such Robbery in the First Degree, and in the course thereof another participant in the offense was armed with a deadly weapon.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of five (5) to fifteen (15) 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/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
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WITNESSES:

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. PO Gabriel Coale, 223 N. Memorial Drive, Independence, MO 64050
3. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050
4. PO Galen McGinley, 223 N. Memorial Drive, Independence, MO 64050
5. PO Brian Weiter, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 8/27/2020

Report #: 2020-52583

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 8/13/2020, at about 2252 hours, Ivory D. Alford Jr., (Race-Black, Sex- Male, DOB- 12/02/2001, Address-4707 E. 46th Street, Kansas City, Missouri 64130, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 08/13/20 at approximately 2252 hours, Independence Police Officers were dispatched to 9330 East 16th Street, Independence, Jackson County, Missouri 64052 in reference to a shooting. Upon the arrival of officers, the victim, Shonay Persinger was located inside the residence, deceased with what appeared to be a single gunshot wound to her chest. A spent 40 caliber shell casing was located near the body of the victim.

A neighborhood canvas revealed a witness at 9405 East 16th Street. The witness, [REDACTED], lives [REDACTED] the victim's residence [REDACTED] observed 4 subjects wearing hooded jackets walking westbound at a quick rate. [REDACTED] then advised he observed a four door vehicle parked in front of his residence. [REDACTED] advised there was a subject in the driver's seat and the brake lights were lit up on the vehicle. [REDACTED] then observed the four subjects walk to the vehicle and get in. The vehicle then backed into a driveway and drove away eastbound on East 16th Street towards Arlington Avenue.

[REDACTED] was interviewed by Detective Gabriel Coale at Police Headquarters. [REDACTED] identified Ivory Alford AKA "Junior" as a possible suspect [REDACTED] told Detective Coale that Alford previously stayed at the address until recently, when the resident Penny Wren kicked them out. [REDACTED] told Detective Coale that he subsequently received a message from Alford saying he wanted to rob Wren AKA "Mama." [REDACTED] said about a week later he was contacted by Wren who informed him that Alford tried to rob her. [REDACTED] said he confronted Alford about it, however Alford denied involvement. [REDACTED] identified Alford's Facebook profile name as "Trasix Pluto".

During the investigation, it was discovered that Persinger had a Samsung Galaxy Note 8; phone number 816-724-9611; that was not recovered at the scene. Persinger's [REDACTED] was contacted and advised that just prior to the shooting, she was on the phone with Persinger. Independence Police Officer Weiter was with [REDACTED] when she began tracking the missing cell phone using a find my phone application. The phone was recovered in a silver Jeep Compass on Wabash Avenue and 36th Street in Kansas City, Missouri. Four subjects were detained and two were later formally interviewed. [REDACTED], a male prostitute who identifies as a female, told investigators that she was walking south bound on Prospect Avenue towards 35th Street in Kansas City, Missouri, when the phone was thrown out of a moving vehicle at her. [REDACTED] described the vehicle as dark in color and believed it to be a Nissan Altima or similar style vehicle. There was damage to the phone which was consistent with being thrown. [REDACTED] said the cell phone was thrown at her sometime between 2300 hours on 08/13 and 0250 hours on 08/14, when she was contacted by police.

[REDACTED] was formally interviewed on 08/14/2020 by Detective Chris Burris. [REDACTED] told Detective Burris that she resided at 9330 East 16th Street, but was in the process of moving out. [REDACTED] she'd only known Alford for about a month. [REDACTED] stated [REDACTED] and Alford were friends. [REDACTED] said that Alford stayed at her residence at 9330 East 16th Street, about ten times. [REDACTED] said she kicked Alford, [REDACTED] and her other daughter, [REDACTED] out of the house because Alford put his hands on her other daughter [REDACTED]. After kicking them out [REDACTED] said she received information from Ingenue telling her that she received information from [REDACTED] that Alford wanted to rob her. [REDACTED] spoke of an incident after being alerted to Alford's plan. The incident was confirmed to have occurred on 08/10/2020, because [REDACTED] called the Independence Police Department to report a burglary in progress. The incident (IPD# 2020-51808) called in by [REDACTED] involved four subjects outside the door trying to get in. [REDACTED] reported that they were kicking the door and yelling "police." [REDACTED]

advised her boyfriend [REDACTED], saw Alford and who he believed to be Alford's brother, [REDACTED] at the door, wearing masks, trying to push open the door when he opened it.

[REDACTED] was brought in for a 2nd interview on 08/14/2020 and interviewed by Detective Burris. [REDACTED]'s statement was consistent with the first interview. [REDACTED] consented to a search / download of his Facebook account and cellular phone. A video was found that Alford sent to [REDACTED] at about 2356 hours, which indicated he was at a bus stop south of 35th Street on Prospect Avenue talking with what appears to be an indigent male.

After reviewing messages from [REDACTED] to Alford on Facebook messenger, Detective Burris found a conversation on 08/07/2020 regarding an apparent conspiracy to commit robbery at [REDACTED]'s house. Alford uses the term "lash the plug", which in my training and experience is street slang for robbing a drug dealer. Also information was found that [REDACTED] had been the source of marijuana to [REDACTED] and Alford, confirmed via Facebook messenger.

Further investigation revealed that Alford was named as a suspect in Gladstone, Missouri Police report 2001902 (reported 07/07/2020 at 2200 hours), where he allegedly robbed three residents at gunpoint for various electronics, including cellular phones, with two other unknown males.

The Facebook profile for Alford which was identified by [REDACTED] was identified as <https://www.facebook.com/trasix.pluto> (Facebook Profile ID # 100052190979551). A search warrant outlining the above-mentioned probable cause was applied for and obtained through the 16th Judicial Circuit Court of Jackson County on 08/18/2020. Facebook produced a copy of Alford's account on 08/21/2020. In review of the copy of Alford's Facebook messages, Detective Burris located several Facebook messages to and from Alford prior to and after the victim's murder implicating him and other subjects. The messages developed probable cause to issue a stop order for Alford.

On 08/26/2020, Alford was arrested on the stop order and subsequently interviewed twice after he was read his Miranda rights. During the first interview on 08/26/2020, Alford acknowledge he knew about the robbery but denied being present. On 08/27/2020, Alford was interviewed again and admitted that he set up the robbery at 9330 E. 16th Street to steal drugs and money. Alford identified four other accomplices. Alford advised he along with his accomplices entered the residence after seeing the victim enter the residence. Alford denied shooting the victim. Alford confirmed that the victim's phone was thrown out near the intersection of 35th and Prospect Avenue. Alford gave consistent statements which matched the witness statements, evidence recovered and Facebook messages.

Detective Christopher Burris # 1401

/S/ Christopher Burris

Print Name

Signature