


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC20059042
PROSECUTOR NO. :	095460591
OCN:	HS021599

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DARRYL K. PRICE)	
9911 Woodland Ave.)	CASE NO.
Kansas City, MO - 64133)	DIVISION
DOB: 08/16/1982)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

AMENDED COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 30, 2020, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others knowingly caused the death of Andrew Dickie by shooting him. Defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Andrew Dickie as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo committed by defendant.

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 (571.015-001Y20205213.0)

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,

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committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about August 30, 2020, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, committed the felony of murder in the second degree charged in Count 1, 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 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 previously filed statement(s) of facts, incorporated herein and submitted as a basis upon which this court may find the existence of probable cause.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kristiane N. Bryant

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WITNESSES:

1. PO De'Andre L. Allen, 1125 Locust, Kansas City, MO 64106

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2. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. Andrew Dickie, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
6. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. DET Jacquelyn R. Mutschler, 1125 Locust, Kansas City, MO 64106
9. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
10. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
11. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106
12. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09/03/2020

CRN: KC20-059042

I, Mary Kincheloe #5063
(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 08/30/2020, at 4910 Paseo in
(Date) (Address)

Kansas City, Jackson Missouri Darryl Price
(County) (Name of Offender(s))

B/M, 8/16/82 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08-30-2020, at 1726 hours, Officers of the Kansas City Missouri Police Department were dispatched to 4900 Paseo on a reported ShotSpotter call. Upon arrival, Officers were directed to 4910 Paseo where they observed an unknown black male, later identified as Andrew Dickie B/M 07/22/1985, deceased in the garage of the residence from apparent gunshot wounds.

A search warrant was obtained for the residence where items of evidentiary value were recovered for further analysis. Those items included but limited to, purported marijuana plants in various stages of growth, equipment utilized in the growth of the plants, bags of purported marijuana and several thousands of dollars in U.S. Currency.

A review of Shotspotter captured the sound of (2) firearms of different caliber being fired simultaneously.

Surveillance video was obtained which captured a yellow Chevrolet Camaro with dark tinted pull into the driveway of 4910 Paseo. The driver, suspect #2 an unknown black male, wearing a black ball cap, white T-shirt, light colored pants and black shoes exit the driver side and approached the garage of the residence out of camera view. A passenger, later identified to be **Darryl Price, b/m, 8/16/82**, wearing a black T-shirt, denim shorts, and dark shoes, exited the passenger side door armed with a long gun pointed at the garage which is out of view of the camera. Suspect #2 and **PRICE** then run back to the yellow Camaro and reverse out of the driveway onto Paseo in the wrong direction of travel and continue in reverse out of view of the camera. The yellow Camaro then drives north in the southbound lanes of Paseo and stops in front of the residence. Suspect #2 is now captured on surveillance video exiting the passenger side of the Camaro. He is observed running, with a firearm in his right hand, in the direction of the garage out of camera view. Suspect #2 is then observed running back toward the yellow Camaro where he entered the passenger side of the vehicle. The Camaro travels north in the southbound lanes of Paseo and out of the view of the camera.

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Additional surveillance video was captured prior to the Homicide which showed the yellow Camaro being followed by a gray Jeep Wrangler, occupied by an unknown person wearing a pink shirt, just before the Homicide. The yellow Camaro is captured eastbound on 49th Street one block to the west of Paseo at 2:25:43. At 2:26:17, the Gray Jeep Wrangler is then captured eastbound on 49th Street traveling toward Paseo (the same direction of travel as the yellow Camaro). At 2:28:11, the Camaro is captured traveling westbound on 49th Street and then southbound on Lydia Avenue. The gray Jeep Wrangler is captured following the Camaro at 2:28:12. The gray Jeep Wrangler is then captured on Genetec cameras and ALPR readers still following the Camaro after the Homicide and is last captured at 79th and Troost, eastbound. The license plate was revealed to be a Minnesota license plate of XBX-127.

A computer search of the license plate revealed it to belong to AVIS-BUDGET rental cars. A search warrant was served to AVIS which revealed the rental agreement with AVIS and a person named SR from August 15, 2020 through September 15, 2020, however, the vehicle was returned on 08-31-2020. The search warrant also revealed GPS locations of the Gray Jeep Wrangler to update every 2 minutes and plot the same path as captured on surveillance video and Genetec cameras after the Homicide. The GPS location of the Jeep Wrangler on 08-30-2000 from 1743 hours to 1749 hours, was at 9911 Wheeling. This address was determined to be **PRICE'S** mother's residence. 08-30-2020 at 1803 hours, the GPS location puts the Jeep Wrangler at 10921 Hickman Mills Drive, Sinclair Gas Station. Detectives recovered surveillance video from Sinclair, which captured the gray Jeep Wrangler occupied by an unknown black male driver, wearing a pink shirt and pink shorts. It also revealed an unknown black male occupying the rear driver's side wearing glasses, a black ball cap, a white tank top, but holding what appeared to be a white T-shirt, light colored pants and black shoes (Suspect #2). The surveillance video also captured **PRICE** wearing what appeared to be the same black T-shirt, denim shorts and dark colored shoes as the original passenger of the Camaro as previously described above. There was also another unknown black male occupant wearing a white T-shirt, black shorts and black shoes.

A victim, identified as A.D., was inside the garage at the time of the shooting and is a friend of the deceased victim. A.D. advised he was sitting in the garage with the victim when a yellow Camaro arrived in the driveway. The driver (Suspect #2) exited and said something to the effect of, "Are you selling any bikes?" A.D. advised the victim repairs/restores motorbikes for close friends and does not advertise this as a business. A.D. said Suspect #2 said, "I talked to you earlier." A.D. said the victim replied he did not sell bikes and did not talk to anyone on the phone about selling bikes. A.D. said suspect #2 turned to walk away and turned back around firing into the garage with a handgun. A.D. said a passenger of the vehicle, later determined to be **PRICE** also got out and began firing into the garage with an assault rifle. A.D. said he ran up the stairs and as he did so, he heard someone yelling, "He's running up the stairs." A.D. did not recognize either of the suspects.

On 08-26-2020, **PRICE** posted a photograph on his Facebook account "Price Darryl" in which he is seen sitting in a vehicle wearing what appears to be the same shirt he was wearing at the time of the homicide.

On 09-02-2020 at 1640 hours, **PRICE** was arrested and placed on an investigative hold for homicide. **PRICE** was transported to Police Headquarters and read his Miranda Rights. **PRICE** admitted to responding to 4910 Paseo with suspect #2. **PRICE** identified himself in the surveillance video as the suspect that exited the passenger side of the yellow Camaro with the rifle. **PRICE** said he was picked up by his cousin and "Chris" in a gray Jeep Wrangler. **PRICE** said they drove to area off Paseo where they met with suspect #2 who was

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occupying a yellow Camaro. **PRICE** said he had never met suspect #2 or "Chris" before. He said "Chris" orchestrated the plan for **PRICE** and suspect #2 to tie up the victim. "Chris" was then supposed to come in and steal the marijuana and U.S. Currency. However, **PRICE** said, suspect #2 was anxious and "amped" up when he got out of the vehicle in the victim's driveway which caused the victim to be alarmed. **PRICE** said suspect #2 just started shooting his handgun at which time, **PRICE** got out of the Camaro and "just pointed" the rifle into the garage. **PRICE** said off camera view, suspect #2 who had, at that point, already unloaded his entire magazine of the handgun into the garage, took the rifle from **PRICE** and unloaded the rifle inside the garage. **PRICE** said "Chris" was on the phone with suspect #2 the whole time directing suspect #2 on what to do to include going back into the house to kill the victim. **PRICE** said after the homicide, they drove to 11312 Bennington. **PRICE** got into the Jeep and then later picked suspect #2 up from the roadway on Red Bridge near Bennington. They then went to the gas station where they are all captured on surveillance video.

Printed Name Mary Kincheloe #5063 Signature /s/ Det. Mary Kincheloe #5063

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

Judge

Circuit Court of _____ County, State of Missouri.