

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC20062500
PROSECUTOR NO. :	095460716
OCN:	HS021820

STATE OF MISSOURI,	)	
	)	PLAINTIFF,
vs.	)	
	)	
ISAIAH B. STAPLES	)	
2541 Lister Ave.	)	CASE NO. 2016-CR
Kansas City, MO 64127	)	DIVISION
DOB: 09/05/1993	)	
Race/Sex: B/M	)	
	)	
	)	
	)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class B felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about September 13, 2020, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a gray Pontiac and/or at another person or persons.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count II. Armed Criminal Action (571.015-001Y20205299.0)

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 September 13, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of weapons charged in Count I, all allegations of which are incorporated herein by reference, and the defendant

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committed the foregoing felony of unlawful use of weapons 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. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

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 concealable firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about September 13, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Springfield Armory XD9 9 mm, a firearm, and on June 22, 2016, the defendant was convicted of the felony of robbery in the second degree in the Circuit Court of Jackson County, Missouri.

The range 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 one (1) year 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.

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.

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JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kristiane N. Bryant

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WITNESSES:

1. [REDACTED] E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED] E 12th St, Floor 11, Kansas City, MO 64106
3. CST Kellie Green, 2645 Brooklyn Avenue, Kansas City, MO 64127
4. DET Ian D. Hobbs, 1200 E. Linwood, Kansas City, MO 64106
5. PPO Davion L. Jones, 1125 Locust, Kansas City, MO 64106
6. PO Ian M Morris, 1125 Locust, Kansas City, MO 64106
7. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
8. CST Benjamin Simmons, 6633 Troost, Kansas City, MO 64131
9. PO Jared W. Tipton, 1125 Locust, Kansas City, MO 64106
10. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09-13-2020

CRN: 20-062500

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 09-13-2020, at 535 Westport Road in
(Date) (Address)

Kansas City, Jackson Missouri Isaiah B. Staples
(County) (Name of Offender(s))

B/M, 09-05-1993, 5'10- 210 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 09-13-2020 at approximately 0200 Hours, Officers of the Kansas City, Missouri Police Department were working in both on duty and off duty capacities in full department approved uniforms. Officers heard the sounds of shots near the area of Westport Road and Mill Street. Officers located several spent shell casings (9MM and 45 Caliber) near the scene of the shooting as well as two separate vehicles sustaining apparent bullet damage during the shooting. Three additional vehicles was located on surveillance video leaving the parking lot where the shooting occurred immediately after the shots area fired. A cascade for any possible gunshot victims arriving at area hospitals was sent out by KCPD Dispatch with negative results. Several additional individuals were observed walking around in the parking lot at the time of the shooting.

Officers responded to the area of 535 Westport Road and observed an individual (identified as **Isaiah B. Staples B/M, 09-05-1993**) who was in possession of a firearm and shooting at other unknown individuals in the parking lot. Upon arrival **Staples** was observed running from the parking lot of 535 Westport Road southbound from the scene. A brief foot chase with KCPD officers and Westport Public Safety ensued and **Staples** was taken into custody without incident south of the parking lot where the shooting occurred. In close proximity to where **Staples** was taken into custody police officers located a handgun in a trash can near where the black male with dreads was taken into custody. The handgun in the trash can was determined to be a Springfield Armory XD9 9mm with a serial# of HG908313. The slide of the handgun was locked back and an empty magazine was still inserted in the magazine well. The handgun was collected and preserved for DNA and fingerprint processing.

On 09-13-2020, PO DeRon Ellis responded to police headquarters to provide a formal statement. PO Ellis stated that he was working in an off duty capacity in the area of Westport Road and Mill Street in full department approved uniform. PO Ellis was assisting other officers with an unrelated offense when he heard gunfire coming from the area of the parking lot associated to World Market (535 Westport Road, Kansas City,

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Jackson County, Missouri). PO Ellis responded to the area and paused near the northeast corner of the parking lot to determine where the gunfire was coming from. He observed a black male (identified as **Staples**) in the southeast corner of the parking lot. PO Ellis observed **Staples** behind a black two-door vehicle and was firing a black handgun to the west towards World Market. Ellis heard gunfire coming from the direction of World Market and observed a grey Pontiac passenger car that appeared to be getting struck by gunfire, however, couldn't determine from where. PO Ellis returned his attention to **Staples**, and observed **Staples** running southbound on Mill Street. Ellis ran south on Mill Street and observed a police officer taking **Staples** into custody.

A Westport Security officer, T.E., who was on duty at the time of this incident was contacted at the scene and later transported to Police Headquarters where he provided a formal statement. He advised he was stationed at a gate just to the east of the World Market parking lot speaking to an unknown citizen. That citizen pointed out a black male with dreads in a black hoodie walking northbound toward the World Market parking lot carrying a black handgun in his right hand. T.E. looked and saw this male walking "with a purpose" holding a handgun down at his side. He then observed what he believed to be a light colored Pontiac parked in the World Market parking lot with the passenger door open. He described a black male crouched down by the passenger door of the Pontiac firing a handgun at the black male with dreads. The black male with dreads returned fire toward the Pontiac and described the shots as a couple of "fuck you" shots. The black male with dreads then fled the scene southbound. T.E. stated he began to pursue the black male with dreads, who he observed shooting, on foot and as he did, he was overtaken by a Kansas City, Missouri Police Officer. The black male with dreads was taken into custody by the Kansas City, Missouri police officer after a brief pursuit. He stated while pursuing this black male he heard "metal hitting metal" sound as they approached the area he was taken into custody. The top of the trash can near where the black male was taken into custody has a metal top similar to the description of "metal hitting metal" as described by this witness.

Staples was contacted at the East Patrol Detention Facility at 2640 Prospect Ave and was escorted from the detention unit to Interview Room #2 after the camera and audio recording were activated to capture the interview in its entirety. I advised Staples of his Miranda Rights by reading them aloud from the Adult Miranda Warning card Form 72 PD while he followed along on the Miranda Warning and Waiver Form 340 PD. **Staples** advised he understood his rights. **Staples** admitted he was in the Westport Entertainment District with friends and had gone to at least two bars within the district (Throwback and Bridges) both of which he described having to go through a metal detector and having been wanded for firearms. **Staples** advised at some point he went outside to meet a female to "smoke" in the parking lot associated to World Market. **Staples** advised he was rolling a blunt when the shooting began "down" from where he was and he ducked under a nearby vehicle and then ran away from the scene. **Staples** indicated he ran south from the area and fell to the ground cutting his right wrist near his palm and causing a laceration to his left thumb near the nail. **Staples** advised he was arrested and advised officers he did not have a firearm and was not involved in the shooting. **Staples** advised the clothing he was wearing at the time of this interview was exactly what he was wearing all night and denied wearing a dark long sleeve jacket or sweatshirt. He denied touching the firearm located near where he was arrested and again advised he did not shoot the firearm. **Staples** signed a Consent to Search for a sample of his DNA via a Buccal Swab Form 155 PD for comparison to swabs from the firearm and the general scene and area.

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Staples subsequently advised he had touched the firearm located in the trash can when he handed it to an associate he only knows as "AO" whom he had never mentioned in the earlier statement. **Staples** described having his finger in the trigger well, on the trigger, and on the frame of the firearm prior to handing it to "AO", however, again denied he was involved in the shooting or threw the aforementioned firearm into the trash can where it was located and recovered from. **Staples** was returned to detention where he was checked back in. While at the detention unit I photographed the property belonging to **Staples** and located a black and yellow striped Nike hoodie similar to what was described by the witnesses.

Staples criminal history reveals him to be a convicted felon for Robbery 2nd Degree (Case #1516CR02847-01) and to currently be on parole through the State of Missouri. Due to the previous robbery conviction and the location where the shooting occurred generally having high foot and vehicle traffic, detectives request this warrant to hold **Staples** for his specific and direct actions in regard to the violent described incident above.

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

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

Judge

Circuit Court of _____ County, State of Missouri.