

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

<b>POLICE NO. :</b>	KC20079418
<b>PROSECUTOR NO. :</b>	095462025
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>GRAHAM DILL</b>	)	
<b>11331 Montgall Ave, #2104</b>	)	<b>CASE NO. 2016-CR</b>
<b>Kansas City, MO 64137</b>	)	<b>DIVISION</b>
<b>DOB: 04/13/2001</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**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 November 18, 2020, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Logan Shank, caused the death of Logan Shank by shooting him.

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, committed the **felony of armed criminal action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about November 18, 2020, in the County of

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Jackson, State of Missouri, the defendant 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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.

**State vs. Graham Dill**

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Kristiane N. Bryant*

Kristiane N. Bryant (#69524)  
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Kansas City, MO 64106  
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**WITNESSES:**

1. [REDACTED] Floor 11, Kansas City, MO 64106
2. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
3. [REDACTED] St, Floor 11, Kansas City, MO 64106
4. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
5. DET James H. Price, 1125 Locust, Kansas City, MO 64106
6. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
7. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
8. Logan Shank, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
9. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
10. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 11-19-2020

CRN: 20-79418

I, Det. James Price #5480, 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 11/18/2020, at 11331 Montgall Ave #2104 in  
(Date) (Address)

Kansas City, Jackson Missouri Graham Dill  
(County) (Name of Offender(s))

w/m 04-13-2001; [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 11-18-2020 at 2318 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 11331 Montgall Ave #2104, Kansas City, Jackson County, Missouri, in regard to a shooting. Upon arrival, officers located the victim inside the apartment, suffering from an apparent gunshot wound. KCFD EMS responded and transported the victim to an area hospital, where he was pronounced deceased. The Jackson County Medical Examiner’s Office subsequently ruled the death a homicide.

Officers contacted Graham Dill w/m 04/13/2001, inside the apartment. While escorting Dill to a transport vehicle, Dill spontaneously uttered, “he came at me and I had to do some fucked up shit, I just got my fucking gun.” Dill was transported to Police Headquarters and escorted to an interview room. The transporting officer told Dill to turn around and he (officer) would remove the handcuffs. Dill replied that he did not have handcuffs on. Dill continued speaking in an incoherent state, slurring much of his speech. In the time Dill was in the interview room, Detectives observed him pacing around the room, punching and kicking the door and walls and yelling for his other friends and roommate, apparently believing he was still inside his apartment. Dill felt along the walls and attempted to remove the dry erase board, in what appeared to be an attempt to find a way out of the interview room. At one point, Dill asked for a cup of water. When Detectives returned with water, Dill spontaneously uttered, “I was in an altercation,” and, “did I not kill this kid?” and, “he threatened to rob me,” and, “I don’t ever want to actually kill this kid,” and, “I love him with all my heart.” Dill’s speech was extremely slurred and somewhat incoherent, leading Detectives to believe he was under the influence of a narcotic; therefore, no attempt to interview Dill was made and Dill was transported to East Patrol Detention.

Detectives contacted several witnesses. Witness [REDACTED] stated he was visiting 11331 Montgall Ave #2104 and is friends with the two parties who live there, Dill and [REDACTED]. [REDACTED], Dill and the victim were hanging out in Dill’s bedroom watching television. [REDACTED] exited the bedroom and walked to the kitchen to get water and a piece of pizza that [REDACTED] had made. Upon exiting the bedroom, [REDACTED] did not see [REDACTED] and believed he had left the apartment. He

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was out of the bedroom for approximately 30 seconds, when he heard what he believed was a gunshot. Before he could get back to the bedroom, he observed the victim exit the bedroom and fall on the floor. He attempted to provide aid to the victim who was suffering from an apparent gunshot wound. ■ stated there had been no argument or physical altercation while he was in the bedroom and he did not hear any arguing or fighting prior to the gunshot.

Witness ■ stated he and Dill both reside at 11331 Montgall Ave #2104. On 11/18/2020 he and his friends, ■ and ■ were hanging out in his (■) bedroom, while Dill, ■ and the victim were hanging out in Dill's bedroom. ■ came into ■'s bedroom and asked for a piece of pizza ■ had just cooked. "Seconds," after ■ entered his bedroom, ■ heard a loud bang and asked out loud if Dill had dropped something. The other parties in the room stated that sounded like a gunshot. As they exited the room, ■ observed the victim exit Dill's bedroom and fall to the floor saying, "I'm dying, I'm dying." ■ and ■ then left out of the apartment. ■ called 911 as he was leaving and was able to give the location to 911 call-takers, just before his phone battery died. ■ is not aware of Dill owning any firearms and was not aware of any firearms being in the apartment. ■ did not hear any verbal arguing or physical altercation prior to the gunshot.

Witness ■'s statement was consistent with ■. He added that he did not care much for Dill and did not interact with him much. Prior to today, ■ had overheard Dill say he had a gun, but he has never seen Dill with a gun. ■ did not hear any verbal arguing or physical altercation prior to the gunshot.

Witness ■ statement was consistent with ■ and ■. ■ did not hear any verbal arguing or physical altercation prior to the gunshot.

Detectives executed a search warrant at 11331 Montgall Ave #2104. In Dill's bedroom, Detectives located a large baggy containing what appeared to be psychedelic mushrooms. Detectives also located a spent 9mm shell casing, with the headstamp Sig 9mm. In ■'s bedroom, Detectives located a Smith and Wesson 9mm handgun. The magazine from the handgun, contained live 9mm ammunition with the headstamp, Sig 9mm. When asked about the firearm in his bedroom, AS appeared surprised. He stated he has never handled a firearm, does not own a firearm and insisted his DNA and fingerprints would not be on the firearm.

Detectives contacted the Jackson County Medical Examiner's Office in regard to the victim's injuries. The ME Investigator observed close range stippling on the victim's forearm and knee, concluding the victim may have been in a seated or crouched position when he was shot. The injuries further appeared consistent with defensive wounds.

On 11/19/2020 at approximately 1245 hours, Dill was transported back to Headquarters and escorted to an interview room. Detectives contacted Dill in the interview and as they sat down, Dill stated, "my good best friend William." Dill was told he would be advised of his Miranda Rights at which time Dill asked if he was being arrested. He then stated, "Will is like my best friend, when I heard about this, I bawled in front of people." "This is outrageous, like, I'm torn apart honestly." Detectives advised Dill we would like to talk to him, but we would have to advise him of his Miranda Rights. Dill then stated he would like his attorney present and the interview was concluded. Dill was transported back to EPD Detention. It should be noted, William or Will, the suspect referred to is not the victim and no party by that name is associated with this case.

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The case detective is requesting an arrest warrant in lieu of a summons for the listed offender, as a firearm was used in this offense. While in police custody, Dill has displayed several indications of being under the influence of narcotics and suspected narcotics were located in his bedroom. It is apparent Dill has access to implements capable of killing. Due to Dill's recent conduct and access to firearms, the case detective believes the offender is a danger to the public. Furthermore, Dill lives with a primary witness and knows the other two witnesses. The case detective believes that if Dill were to be released he would represent a significant and clear danger to the primary witnesses involved.

Printed Name Det. James Price #5480 Signature Det JP #5480

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.