

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

POLICE NO. :	KC20079764
PROSECUTOR NO. :	095462137
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
TEVIN M LYNCH)	
5303 Persimmons Trail, Apt. 1)	CASE NO. 2016-CR
Kansas City, MO 64129)	DIVISION
DOB: 11/09/1992)	
Race/Sex: W/M)	
)	
)	DEFENDANT.

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 20, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Heath Morgan caused the death of Heath Morgan 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 20, 2020, in the County of

State vs. Tevin M Lynch

Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count One 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. Tevin M Lynch

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeannette Wolpink
Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street, FL 7M
Kansas City, MO 64106
(816) 881-1776
jwolpink@jacksongov.org

WITNESSES:

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106
3. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
4. DET James H. Price, 1125 Locust, Kansas City, MO 64106
5. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
6. [REDACTED] St, Floor 11, Kansas City, MO 64106
7. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
8. [REDACTED]
9. [REDACTED], MO 64106
10. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 11-23-2020

CRN: 20-79764

I, Detective Ryan Taylor, #5585, KCPD Homicide Unit
(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 11-20-2020, at 5756 Indiana Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Tevin Lynch
(County) (Name of Offender(s))

W/M, 11-09-1992 committed one or more criminal offense(s).
(Description of Identity)

- Murder
- Armed Criminal Action

The facts supporting this belief are as follows:

On 11-20-2020 at 11:15 hours, officers of the Kansas City, Missouri Police Department were dispatched to 5756 Indiana in regard to a shooting.

The victim called 911 and stated he needed help and that he had been shot. The victim provided the call taker with the suspect's name as Tevin Lynch with a "T." A "Mexican" and bald headed (when asked who shot him). The victim repeatedly asked for help and provided the name "Tevin" multiple times during the 911 call.

Upon the officers arrival the residence was secured. After forcing entry into the residence the victim (911 calling party) was located suffering from multiple gunshots wounds. Officers began attempting to administer life saving measures however, the Victim succumbed to his injuries and was pronounced deceased by the responding KCFD Medic.

A search of police databases resulted in only one match to the identification of Tevin Lynch W/M 11-09-1992.

At 1953 hours, officers of the Kansas City, Kansas Police Department came into contact with Tevin Lynch and a female named [REDACTED] Tevin Lynch was arrested and released on a municipal charge and [REDACTED] was arrested and booked into the Wyandotte County Jail for warrants.

On 11-21-2020 detectives contacted Rebecca Singh at the Wyandotte County Jail. She denied that they (she and Tevin Lynch were in the area of the homicide) and that she was with him all day. Singh further stated that if she could see her phone or Tevin's "there would be evidence" on the phones.

Detectives collected the victim's cellular device from the crime scene and looked at text messages and call logs and discovered a phone call from "Tevin Grass" on the morning of the homicide at 10:27:52, approximately 42

PROBABLE CAUSE STATEMENT FORM


CRN 20-79764

minutes before the 911 call to KCPD dispatch. The phone number for "Tevin Grass" is 913-289-2787. Additionally, on 11-17-2020 the victim received a text message from "Tevin Grass" that stated "I just got AT&T so I will have this for sure number lol.. bet you tired of updating it huh. This tev".

Detectives contacted [redacted] who stated the he and the victim were intimate partners. [redacted] stated that he met "Tevin" on a dating application and introduced "Tevin" to the victim a few months ago. [redacted] was shown a single photograph of Tevin Lynch W/M 11-09-1992 to which he positively identified as "Tevin" he was intimate with and introduced to the victim.

Detectives contacted [redacted] who stated he has known the victim for approximately one year. [redacted] stated he went to the victim's residence on 11-20-2020 between 0900 and 1030 hours. Once there, [redacted] walked up to the front door and began knocking on it numerous times. At that time, he observed a male walking up to the front from the rear of the victim's residence. [redacted] asked the male if he (the victim) is up. The male replied that he did not know. The male stated that the victim had called him approximately two hours prior to ask him to come over, but did not get an answer at the door when he arrived. The male got into the driver seat of an older black Nissan or similar type four door sedan with damage to the front passenger fender, which was parked in front of the victim's truck which was in the driveway. [redacted] described the male as being around the same height as him but slightly bulkier wearing a light mustache and looking slightly "Mexican" with a short fade haircut wearing all black. [redacted] advised that he had seen the described male at the victim's house on previous occasions and believed the connection between the victim and the male to be that the male would buy weed from the victim. Detectives showed [redacted] a DOR photo of Tevin Lynch W/M 11-09-1992 and asked if the male in the photo looked familiar. [redacted] identified the male in the picture as the male he had been referring to through the interview but did not know his name.

Printed Name /s/ Det. Ryan Taylor, #5585

Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.