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

PO	LICE NO.:	KC2100)2779
PROSECU	TOR NO.:	0954626	520
	OCN:		
STATE OF MISSOURI,)
,	PLAIN	NTIFF,)
vs.)
TITYANA COPPAGE))
9628 Lydia, Apt. D) CASE NO. 2116-CR
Kansas City, MO 64131			DIVISION
DOB: 12/14/1999)
Race/Sex: B/F)
)
	DEFEN	DANT.)

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 January 13, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Keith Lars caused the death of Keith Lars by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), RSMo, it will be based on the death of Keith Lars as a result of the perpetration of the class B felony of shooting at or from a motor vehicle under Section 571.030(9), RSMo, committed by the defendant or in the alternative as a result of the class B felony of shooting at a person under Section 571.030(9), RSMO, committed by the 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, committed the **felony of armed criminal action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about January 13, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of [name of murder 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.

State vs. Tityana Coppage

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/ Daniel Portnoy

Daniel Portnoy (#62186) Assistant Prosecuting Attorney 415 E. 12th St., 11th Floor Kansas City, MO 64106 (816) 881-3286 dportnoy@jacksongov.org

WITNESSES:

- 1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
- 2. E 12th St, Floor 11, Kansas City, MO 64106
- 3. Keith Lars, Prosecuting Atty. Office, 415 E 12th 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 Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
- 7. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
- 8. King Smith, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 9. PO Dustin C Spainhower, 1125 Locust, Kansas City, MO 64106

10.		
	. MO 64106	

12. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

Date: 01-16-2021	CRN: 21-002779
I, Detective Bonita Cannon, #4585, Kansas C	
(Name and identify law enforcement officer, or per-	son 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 01-13	3-2021 , at 3119 Thompson Ave in (Address)
Kansas City, Jackson (County) Miss	souri Tityana Coppage (Name of Offender(s))
DOB: 12-14-1999. (Description of Identity)	committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 01-13-2021 at approximately 1233 hours officers of the Kansas City Missouri Police Department were dispatched to 3119 Thompson Avenue, Kansas City, Jackson County Missouri in regard to a shooting. Officers located a crime scene behind that location and 508 Benton Boulevard. It should be noted that 508 Benton Boulevard and 3119 Thompson Avenue share a rear parking lot.

Officers were also dispatched to Admiral Boulevard and Virginia Avenue on a reported shooting. A male victim was in the rear of a gray Toyota suffering from gunshot wounds. It was determined the shooting victim was transported from Thompson and Benton Boulevard to Admiral Boulevard and Virginia Avenue.

The driver of the Toyota refused to provide any information regarding this investigation. The owner of the Toyota responded and signed the Consent to Search form for her vehicle. CS Techs recovered a jacket and sweatshirt from the rear of the vehicle with apparent blood on them. Two firearms (Glock model 19 9mm with an extended magazine and a Glock model 30 45 caliber) were recovered from the glove compartment of the vehicle.

Witness (Titan Security Officers) working at 705 Virginia Avenue, both stated a male stopped a grey Toyota in the middle of the street (Admiral Boulevard and Virginia Avenue). He exited yelling for help and that his brother had been shot. Both witnesses responded with KCFD EMT personnel to the vehicle, observing the rear doors of the vehicle as well as the driver door standing open. The victim was observed slumped across the rear seat of the vehicle. He was not wearing a shirt and his pants were down around his ankles. Both stated the victim's shirts were inside out around his wrist. Both assisted KCFD EMT remove the victim from the vehicle to perform life saving measures. It was then determined the victim was already deceased. He was pronounced at 1242 hours. He sustained a gunshot wound to his upper right chest and lower leg.

The Jackson County Medical Examiner ruled the victim's death as a homicide.

CS Tech Nelson responded to process the scene at 3119 Thompson. There she recovered 23 shell casings. 8 were .45 caliber and 15 were 9 mm.

During this investigation an area canvass was conducted. A resident, who did not wish to be identified, stated he heard shooting and observed a black Ford Escape leaving the rear parking lot.

was contacted and stated she pulled into the rear parking lot of 3119 Thompson with her 4 year old son. She observed a black SUV also in the rear lot partially blocking her path of travel. stated she was backing her vehicle into a

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, who had

parking space when she observed two males (the victim and should walking away when the person from the black SUV shot at them. One of the males fired at the black SUV.
stated she heard one of the males yelling, "Fuck, fuck, fuck," and upon approach noticed the victim was on the ground and appeared lifeless. stated she assisted a male carry the victim to a sedan and place the victim on the rear seat of the vehicle. She also stated she put their firearms in the glove compartment. She stated the male () told her he knew who shot at them. stated she does not know any of the persons involved and was trying to help the victim. Witness vehicle was struck at least once by gunfire.
Witness, was located inside her apartment at 508 Benton Boulevard. She stated she observed a black Ford Escape drive into the parking lot behind a gray sedan. stated that parties (at least three) exited both vehicles (1 subject in the black vehicle and 2 subjects in the gray vehicle) and spoke to each other in the parking lot. stated she looked away then heard several gunshots coming from the parking lot. She looked out and observed the three males shooting at each other.
During this investigation detectives were provided video footage of a gray Toyota being followed by a black Ford Escape in the area of Thompson Avenue and Benton Boulevard. Both vehicles pulled into the rear parking lot of 3119 Thompson Avenue. A few moments later the black Ford Escape leaves the parking lot nearly striking a passing motorist. Approximately one minute later the gray Toyota exited the parking. Upon checking city cameras for the area, a black Ford Escape bearing Georgia license plate CLC7953 was observed in the same area.
On 01-14-2021 the 2019 black Ford Escape bearing the same Georgia license plate was observed, unoccupied in the parking lot 11338 Blue Ridge Boulevard by a maintenance worker for the apartment complex. He reported observing several bullet holes on the passenger side of the vehicle. He further reported a blue tarp was partially covering the vehicle. The tarp only covered the top of the vehicle down to the lower portion of the windows. The apparent bullet holes were covered by tape and colored with a black marker.
Also during this investigation detectives were given information regarding a shooting that occurred on 01-11-2021 in the 2500 block of Kensington. Family members of the victim stated the victim was driving a white GMC SUV (rental vehicle) when he was shot at. Family members stated he had been looking for the victim since 01-10-2021. Information was also received that he wanted to kill the victim, due to believing the victim was involved in the death of 16 year old son. Son was murdered on 01-10-2021 (CRN #21-2192).
A witness stated the victim told her on 01-11-2021 that a he was shot at in the rental vehicle (White GMC Terrain) and he was shot at by family. Detectives learned that the victim and are cousins.
Another witness stated the victim told her "TT" (later identified as Tityana Coppage B/F 12-14-1999) called and asked the victim to come and meet with her. When he returned home he told her "TT" jumped out in front of his vehicle at 25th and Kensington, he stopped to avoid hitting her. She runs off at which time unknown parties shot into his vehicle several times. He told her he couldn't drive the vehicle so he left it parked with extensive damage. The victim was not injured during that particular incident.
On 01-14-2021 a white GMC Terrain bearing Washington license plate BM81132 for 2021 was located at 2537 Elmwood.

The GMC was unoccupied with extensive damage from what appeared to be gunfire. A computer check of the vehicle

rented the 2019 Black Ford Escape that was used in the Homicide. While detectives were attempting to contact

revealed it to be an Avis Rental vehicle. A search warrant was obtained for the vehicle. On 01-15-2021 detectives responded to 9628 Lydia #D in an attempt to make contact with

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which was met with negative results, they noticed cameras on the building. They contacted staff at the leasing office and were informed they did have Watch Tower Security cameras at their complex.

Detectives were able to review the video and noted that on 01-13-2021 at approximately 12:58:25 the black Ford Escape pulls into the parking lot and backs into a parking spot. At approximately 12:59:35 Coppage wearing what appears to be a maroon or red hoodie and grey pants gets out of the Escape, walks around to the passenger side of the Escape, bends down and is looking at what is believed to be the bullet holes that were on the passenger side of the vehicle. At approximately 13:00:48 a female wearing a blue shirt and black pants walks over to the Escape and appears to interact with Coppage who had gotten out of the Escape, and then goes back out of camera view.

The video further shows Coppage then gets back into the driver's side of the Escape at approximately 13:04:11, and then walks to a white 4 door sedan that is parked in the parking lot. Coppage opens the rear driver's side door and leans into the car. At 13:17:06 the female wearing blue then walks back out and goes to the white 4-door, then to the black Escape where Coppage is now standing. At approximately 13:25 the female wearing blue walks back towards the building and out of camera view. The female in blue then comes back out to the Escape at 13:35:58 goes to the white 4-door sedan gets in and back out of the driver's seat before going back towards the buildings again out of camera view. Coppage goes back and forth between the white sedan and black Ford Escape. Coppage then goes to the building and out of camera view at approximately 14:54:20 after going back to the white 4-door sedan.

Apartment staff was able to view the video and state that the white sedan was vehicle; they were able to ID the female in the blue as and identified the female who got out of the black Ford Escape (who looks like a male) was Walker's girlfriend, but did not know her name.

As the white Dodge was being prepped for towing, a female later identified as Tityana Coppage exited the building of 9628 Lydia and approached the tow truck driver. Coppage had a red duffle bag strapped around her chest and was carrying a yellow plastic bag. She was taken into custody at approximately 1215 hours.

Upon taking Coppage into custody a Glock model 30 45 caliber; with an extended magazine was recovered from her waistband.

Coppage was transported to Police Headquarters, 1125 Locust. Coppage was advised of her Miranda Rights and stated she understood.

Coppage stated the following: She knew the victim would be in the area of Independence and Benton. She responded there and observed the victim in a blue colored vehicle. He told her to follow them, to which she did. She stated the victim and an unknown male parked in the parking lot, she parked her rental (Black Ford Escape). Coppage stated the victim exited the vehicle he was in, approached her vehicle. As he did so a black SUV pulled into the lot slowly before parking. No one exited the black SUV.

Coppage stated the victim asked her if she knew who was in the black SUV. She told him no. Coppage stated the victim pulled out a gun and started shooting at the black SUV. Coppage stated she went to get out of her vehicle and was going to shoot at the black SUV, however the victim told her to stay in her vehicle. Coppage stated she fired her weapon out of the passenger window of her vehicle. She stated at some point the victim got in the way during the exchange of gunfire. Coppage denied exiting the Ford Escape during the exchange of gunfire.

Coppage stated in regard to the shooting on 25th and Kensington she was not there. She stated she called the victim asking him to meet her in hopes of the victim and her father would settle their differences before they killed each other.

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Coppage stated she told the victim to meet her around the corner from 25th and Kensington. She stated shortly afterwards, she heard gunshots. She stated her father, called and told her that the victim drove up and started shooting at them on 25th and Kensington. Coppage stated her father; believed the victim had something to do with the death her brother's death.
Coppage signed the Consent to Search for her DNA (buccal) and her cell phone. Upon reviewing her cell phone Coppage exchanged messages with someone she referred to as "Auntie". She is asking for .45 caliber bullets. She sent a message "Lol I used to many on bro." The message was sent 01-14-2021 at 0925 hours. Coppage also sent a message to a contacted labeled "BIGBODY Gangway" (later determined to be her deceased brother who was killed on 01-10-2021). The last message was "Sent a Nigga to my brother I owe em that body." Message was sent at 01-14-2021 at 0435 hours.
A search warrant for the apartment was requested. During an execution of the search warrant of the apartment the red hooded sweatshirt with the white circular logo and a shotgun were recovered. The firearm recovered from the gray Toyota was compared to the shell casings at the scene on Thompson. The firearm recovered from Coppage was also compared to the shell casings at the scene. It was determined by the KCPD Firearms Lab both firearms were used during this incident.
Printed Name Det. Bonita Cannon, #4585 Signature Det. By C #4585
The Court finds probable cause and directs the issuance of a warrant this day of
Judge
Circuit Court of County State of Missouri