

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	210005787
PROSECUTOR NO. :	095463271
OCN:	

STATE OF MISSOURI,

PLAINTIFF,

VS.

TAYLAND RAHIM
110 NW 80th Street,
Kansas City, Missouri 64118
DOB: 01/01/1993
Race/Sex: W/M

CASE NO. 2116-CR
DIVISION

DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205212.0)

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 E felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 4, 2021, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a rifle, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range punishment for a class E 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 four (4) 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

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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.

**Count II. Unlawful Use Of Weapon - Subsection 5 - While Intoxicated - Loaded
Weapon (571.030-011Y20205213.0)**

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 E felony of unlawful use of a weapon**, punishable upon conviction under Sections 571.030.8, 558.002 and 558.011, RSMo, in that on or about January 4, 2021, in the County of Jackson, State of Missouri, the defendant knowingly discharged a firearm rifle while the defendant was intoxicated.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range punishment for a class E 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 four (4) 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
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WITNESSES:

1. TPR Ryan Wilhoit, 504 E. Blue Pkwy, Lees Summit, MO 64063

PROBABLE CAUSE STATEMENT FORM

Date: 03/01/2021

I, Ryan J. Wilhoit, a Sergeant with the Missouri State Highway Patrol, upon my oath, and under penalties of perjury, knowing the facts contained herein are true, state as follows.

1. I have probable cause to believe that **Rahim, Tayland**, white/male; DOB: **January 01, 1993**, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On Monday, January 4, 2021, at approximately 2142 hours, two members of the Missouri State Highway Patrol were involved in a use of force incident at the Missouri State Highway Patrol Troop A Headquarters, located at 504 Southeast Blue Parkway, Lee's Summit, Jackson County, Missouri 64063. The subject involved in this incident was identified by his Missouri driver's license as Tayland Rahim, date of birth January 01, 1993. Based on witness interviews, crime scene investigation, and a review of surveillance video footage from Troop A Headquarters, the following series of events occurred.

On Monday, January 04, 2021, at approximately 2125 hours, a black Ford F-150 traveled into the Troop A Headquarters parking lot, reversed into a parking spot on the west side of the Troop A Headquarters building, with its front end facing east towards the building. The Ford F-150 remained parked until approximately 2141 hours, when Rahim exited the driver's seat of the Ford armed with an assault-style rifle. Rahim began walking in the west parking lot and appeared to load the rifle by manipulating its bolt. Rahim held the rifle in his right hand, down the right side of his body as he walked in the west parking lot. A Missouri State Highway Patrol trooper was driving his fully marked Ford Explorer patrol vehicle through the west parking lot shortly after Rahim exited the Ford F-150. Rahim approached the driver's side of the trooper's patrol vehicle with the rifle still in his right hand on the right side of his body. The trooper accelerated away from Rahim in the parking lot and notified Troop A Radio of the situation. Rahim walked towards the west side of the building, between two unoccupied, parked Missouri State Highway Patrol vehicles. Rahim turned around, raised the rifle in his right hand and appeared to discharge the rifle in a northwest direction, indicated by a muzzle flash. Immediately after, Rahim appeared to reload the rifle by manipulating its bolt while walking south in the west parking lot towards Southwest Blue Parkway. One spent 7.62 x 39-millimeter casing and one live 7.62 x 39-millimeter ammunition round was located near the approximate area where Rahim appeared to discharge the rifle and manipulate its bolt.

During an interview with a Missouri State Highway Patrol sergeant, he explained he was inside a zone office on the southwest corner of Troop A Headquarters, when he heard a loud bang outside. The sergeant explained he walked with another trooper from the zone office to the elevated, west exterior door of Troop A, where he observed Rahim walking in the west parking lot, armed with a rifle. The sergeant explained he opened the door and gave Rahim several verbal commands to drop the rifle. The sergeant explained Rahim did not comply with his verbal commands, but responded by raising the rifle and pointing it at him. The sergeant explained he discharged his service weapon at Rahim because he was in fear of his life and the lives of Missouri State Highway Patrol personnel inside of Troop A Headquarters.

During an interview with a Missouri State Highway Patrol trooper, he explained he was in a zone office in the southwest corner of Troop A Headquarters, when he heard what he immediately recognized as a gunshot outside. The trooper explained he went from the zone office to the elevated, west exterior door of Troop A Headquarters with a Missouri State Highway Patrol sergeant. The trooper explained he observed Rahim walking in the west parking lot, armed with a rifle. The trooper explained he ran to the front desk and Troop A Radio room to warn them of the armed subject in the parking lot and to take cover. The trooper went to a front office in the west wing of Troop A, looked out of the window and observed Rahim standing beside a tree on the south side of the building, still armed with the rifle. The trooper explained Rahim was facing towards US 50 Highway and the southwest corner of Troop A Headquarters holding the rifle. The trooper explained he believed Rahim was prepared to shoot the sergeant who exited the elevated, west door, should he come around the corner of the building from the location of the west, exterior door. The trooper inside the office explained he yelled verbal commands at Rahim to drop the rifle, with no response from Rahim. The trooper explained Rahim raised and discharged the rifle towards US 50 Highway at responding Lee's Summit Police Department officers. The trooper explained he discharged his service weapon through the front office window at Rahim as he stood next to the tree, still armed with the rifle. The trooper explained he discharged his service weapon at Rahim because he was in fear of his life, the lives of Missouri State Highway Patrol personnel inside Troop A Headquarters and the lives of responding Lee's Summit Police Department officers.

The incident as described by the Missouri State Highway Patrol sergeant and trooper is supported by video surveillance footage and evidence recovered at the scene.

Missouri State Highway Patrol troopers and Lee's Summit Police Department officers secured Rahim in handcuffs and rendered first aid to his injuries. While handcuffing Rahim in handcuffs a Missouri State Highway Patrol trooper observed the odor of intoxicants about Rahim's person. Rahim was transported by ambulance to Research Medical Center, accompanied by a Missouri State Highway Patrol trooper.

During processing of the crime scene, a black assault-style rifle was located on the front lawn of Troop A Headquarters. Multiple fired 7.62 x 39-millimeter ammunition casings and unfired 7.62 x 39-millimeter ammunition rounds were located in the Troop A Headquarters parking lots and front lawn.

On January 08, 2021, an investigative subpoena for Rahim's medical records from Research Medical Center was issued by the Circuit Court of Jackson County, Missouri. Rahim's medical records indicated he had a .266% blood-alcohol concentration on January 04, 2021, at 2229 hours.

Tayland Rahim is currently a patient at Research Medical Center, located at 2316 East Meyer Boulevard, Kansas City, Missouri 64132, where he continues to receive treatment for his injuries. Due to the violence of Rahim's actions and ongoing safety concerns for the public and law enforcement officers, along with knowledge of him recently traveling outside the United States of America, we are requesting his passport documents be retained to prevent a flight risk. Tayland Rahim's current home address is 110 Northwest 80th Street, Kansas City, Missouri 64118.

/s/ Sgt. Ryan J. Wilhoit

Signature

Sergeant Ryan J. Wilhoit

Missouri State Highway Patrol

THE COURT FINDS PROBABLE CAUSE

Judge

Date