

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

POLICE NO. :	17-096163
PROSECUTOR NO. :	095442668

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
CAITLYN A. RIFFLE	)	
4616 Tracy Ave,	)	CASE NO. 1716-CR
Independence, MO - 64056	)	DIVISION
DOB: 12/28/1992	)	
Race/Sex: W/F;	)	
SSN: XXX-XX-XXXX	)	
DEFENDANT.	)	

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about November 11, 2017, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another, after deliberation, knowingly caused the death of Rodney V Thurber by shooting him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

Count II. Armed Criminal Action (571.015-001Y19755212.0)

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 November 11, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant

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committed the foregoing felony of murder in the first 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 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.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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/ Jeremy J. Baldwin

Jeremy J. Baldwin (#62734)
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WITNESSES:

██

DET Donna M. Drake , 5301 E. 27th Street, Kansas City, MO - 64127
DET Darin K. Penrod , 1125 Locust, Kansas City, MO - 64106
DET Mark A Slater , 1125 Locust, Kansas City, MO - 64106

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PO Christopher S. Smith , , , -

Rodney V Thurber , 4616 Tracy Ave, Kansas City, MO - 64110

DET Jeremy D. Wells , 1125 Locust, Kansas City, MO - 64106

PO Kelsey S. Wingate , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 12-04-2017

CRN: 17-96193

I, Det. Jeremy D. Wells #5015

(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 11-11-2017, at 4616 Tracy Ave in
(Date) (Address)

Kansas City, Jackson County Missouri Caitlyn A Riffle
(County) (Name of Offender(s))

W/F, 12-28-1992 SS# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On **11/11/2017** at approximately **1820 hours**, Officers of the Kansas City, Missouri Police Department were dispatched to **4616 Tracy Avenue Apt B, Kansas City, Jackson County, Missouri 64110** on a reported shooting. Upon arrival officers discovered a male victim, a tenant, with apparent gunshot wounds inside the residence in the second floor apartment. The male victim, identified as **Rodney V. Thurber W/M, 10-09-1965** was confirmed deceased on scene by KCFD EMS and his death is being investigated as a homicide. The Jackson County Medical Examiner's Office determined the cause of death as multiple gunshot wounds. Four .380 spent shell casings were recovered from the scene.

Detectives at the scene made contact with a living (uninjured) witness who was inside the residence at the time of the shooting. The Witness described the events of the day of the shooting/homicide on 11/11/17. The Witness described a visitor known as "[REDACTED]" had arrived approximately 40 minutes prior to the shooting at 4616 Tracy Av Apt B, to retrieve a handgun from Thurber. The Witness stated Thurber was "holding" it for [REDACTED]. The Witness described [REDACTED] as a blonde petite white female, short in stature, approximately 25 years of age. The Witness stated on 11/11/17 at approximately 1810 hours, the Witness and Thurber were inside the residence when they heard a knock on the rear door of Thurber's second story apartment. Both the Witness and Thurber responded to the door. The Witness stated an unknown white male pushed his way into the residence past the Witness and fired two times striking Thurber. Thurber fell to the floor. The white male stated to Thurber, **"Remember me bitch!"** The Witness stated Thurber appeared unfamiliar with the white male, and the white male stated, **"I'm Patrick, [REDACTED] boyfriend."** The shooter then shot Thurber again, then immediately left the apartment in an unknown direction. The Witness described the white male shooter as approximately 6' tall, 250 lbs., with long unkempt brown hair and beard wearing a dark parka style coat with apparent fur around an apparent hood. He was also wearing apparent dark jeans.

Exterior residential surveillance video was obtained within close proximity to 4616 Tracy Ave. The video depicted an apparent silver BMW four door with a sun roof which was driven from Tracy Av west into private driveway of 4616 Tracy Av. on 11/11/17 at approximately **5:39:15 PM**. The vehicle proceeded to the rear west side of 4616 Tracy Av out of camera view. It should be noted the rear property of 4616 Tracy Av is enclosed by

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a garage structure to the west, and 6' fencing on the north and south sides of the rear property. The rear west second story entry door was reported to be the primary door used by the victim. The same BMW vehicle was then captured on the same surveillance video being driven east out of the driveway and then south onto Tracy Ave approximately **5:47:16 PM**. After the silver BMW left the area, the same residential surveillance video captured a subject wearing pants, tennis shoes, and an apparent hooded coat walking from Tracy Av west down the driveway towards the rear of 4616 Tracy Ave out of view approximately **6:10:51 PM**. The pedestrian subject walked westbound in the driveway of 4616 Tracy Av towards the rear fenced property and was out of view for approximately three minutes. The subject was then observed returning into view and ran east in the driveway from the rear west yard towards Tracy AV, then southbound at approximately **6:13:13 PM**. The subject then slowed to a walk after reaching the sidewalk, and headed south in the direction of Emanuel Cleaver II Blvd.

During the course of the investigation, additional exterior surveillance video was collected from area businesses on Emanuel Cleaver II Blvd between Forest Ave and Paseo Blvd. to attempt to capture the direction of travel and activity relative to both the BMW and the unknown pedestrian subject wearing pants and the hooded coat. Surveillance video was obtained from McDonald's, 1200 Emanuel Cleaver Blvd, just west of Tracy Av, which captured a vehicle which appeared similar to the BMW, pulling into the east entrance of the McDonald's parking lot consistent with the time frame of the BMW which was captured leaving Tracy Av. The BMW was then observed in the McDonald's drive thru. The driver of the BMW was observed to be a blonde white female as she paid for her beverage at the drive thru window. The BMW was then driven west onto Emanuel Cleaver II Blvd, as it left the McDonald's parking lot. Additional video was reviewed which depicted the same BMW circling the block of Emanuel Cleaver II Blvd. from Troost Av to Paso Blvd, then back eastbound on Emanuel Cleaver II Blvd. The BMW was then observed being driven back into the east parking lot of the same McDonald's at approximately **6:16:39 PM** and parked. No one exited the vehicle at that time. During the same time frame of the documented activity of the BMW as it circled the aforementioned area, the apparent unknown pedestrian subject was observed on the same McDonald's surveillance video at approximately **6:14:36 PM** walking westbound from the area of Tracy Av onto the McDonald's parking lot property. The subject was observed wearing apparent military green pants, a dark hooded coat, with the apparent fur like trim hood covering the subject's head. The pedestrian subject's actions depicted the direction of travel as being multi-directional and continuous within the immediate area of the McDonald's and Emanuel Cleaver II Blvd. Ultimately, the pedestrian subject was observed on surveillance video running towards the parked BMW. The pedestrian subject was determined to be a white male with long hair as his coat came open and the hood was no longer on his head as he ran towards the BMW and hurriedly entered the front right passenger door of the BMW. The BMW was then driven westbound on Emanuel Cleaver then northbound on Forest Ave. The McDonald's surveillance video depicted the BMW to have an apparent temporary tag affixed to the rear of the vehicle and apparent damage was observed on the right front quarter panel near the headlight and front grill.

Investigators also searched the victim's cell phone to identify any of the victim's activity. The last person the victim was in contact with prior to the shooting per phone text data and computer checks relative to the cell phone number associated with the most recent text communication with the victim, responded back to **Caitlyn A. Riffle, w/f, 12/28/1992, 5'1", 113 lbs, blonde hair**. The text communication between the victim and the number associated with Riffle on 11/11/17 referenced a gun being "stashed" for Riffle and Riffle wanting it back. The victim also had photographs of a silver BMW 540i within the digital data collected from his cell phone, which indicated the BMW had a temporary tag. An image captured a partial VIN on the vehicle as well.

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The identifying information on the temporary tag was not apparent. Additional images within the victim's cell phone data included specifically a .380 Smith and Wesson handgun. The images also captured serial number information.

A computer check regarding the partial VIN revealed a **silver four door 2002 BMW 540 sedan VIN # WBADN63422GN85028** as a vehicle which had been towed by a Lee's Summit Police Officer, and later determined to have been reported stolen out of Kansas City, Missouri on 11/6/17, taken in conjunction in a car-jacking. The BMW was recovered and towed from Wal-Mart located at 1000 NE Sam Walton Dr, Lee's Summit, MO on 11/14/17. KCPD Investigators retrieved surveillance video associated with the Wal-Mart to attempt to identify when the stolen vehicle arrived on the property. The video collected captured a female, who appeared to be Riffle, in the company of a white male with long brown hair, consistent in appearance to the same white male pedestrian subject who hurriedly entering the BMW at the McDonald's after the shooting. The date they both arrived on the Wal-Mart property associated with the abandoned stolen BMW was 11/12/17. Both are depicted associated with the silver BMW which they parked on the property. They both entered the Wal-Mart and a purchase was made by the male with long brown hair with a Wal-Mart gift card for a Brisk brand tea and cigarettes. Interior surveillance video provided additional images which provided specific identifying information to the white male's appearance, long hair style, and build. When both exited the store after the purchase, they were picked up by an unknown individual in a vehicle and left the area. The BMW remained abandoned on the property where it was recovered from by the Lee's Summit PD officer. The Wal-Mart gift card used for the purchase on 11/12/17 was tracked to a return made by the same white male with long hair at an Independence, MO Wal-Mart on 11/11/17, the same day of the shooting/homicide, approximately two hours *after* the shooting. The Wal-Mart surveillance video which captured the white male's appearance inside the store on 11/11/17 was consistent with the long hairstyle, pants, and coat worn by the subject captured on surveillance leaving 4616 Tracy Av and subsequently entering the BMW driven by the white female on the McDonald's parking lot following the shooting/homicide. As Riffle and the white male arrived to the Independence, MO Wal-Mart on 11/11/17, video surveillance indicated Riffle was driving a silver BMW four door and the white male with long hair was the passenger, and two minor children (one toddler) were also in Riffle's custody.

A search warrant was executed on the recovered stolen BMW on 11/17/17. **The silver four door 2002 BMW 540i sedan VIN # WBADN63422GN85028** was observed to have consistent damage as the BMW captured on the McDonald's surveillance video on 11/11/17. Within the BMW, the following items were observed; a Quik Trip receipt associated with 1001 SW Blue Parkway, Lee's Summit, MO, dated 11/12/17 1:52 PM, an apparent leather winter hat with apparent fur trim, which would frame the face when worn, used diapers, children's toys were located within the vehicle, an empty Brisk brand tea bottle in the front passenger floor board, and cigarettes consistent with the brand of cigarettes and Brisk tea purchased with the Wal-Mart gift card on 11/12/17 by the male with long hair. No apparent damage was observed to the steering column, and ignition keys were not located.

On 11/20/17 a gun trace was requested in regard to the .380 Smith and Wesson handgun captured on the victim's cell phone electronic data images. The trace results indicated the handgun had been legally purchased on 9/26/2017 at a gun store in Lee's Summit, MO and was not reported stolen. The purchaser was documented as Stephanie Powell, w/f, 1/14/68. A computer check of Powell indicated Powell had a relative by the name of

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Patrick R. Powell, w/m, 5/25/88. A computer check of Patrick Powell was conducted through MO DOR and the DOR image associated with Patrick R. Powell was consistent with the images obtained on the previously collected surveillance video from the Wal-Mart businesses, except the DOR image indicated a shorter hairstyle. Patrick's DOR address was consistent with Stephanie Powell's DOR address in Greenwood, MO. Additional searches for identifying images for Patrick Powell revealed a Missouri Department of Corrections image which depicted Patrick Powell with a longer hair style consistent with the hairstyle captured on the Wal-Mart surveillance images.

On 12/04/2017 at 1930 Hours, members of the Kansas City Missouri Police Department located and arrested **Powell** and **Riffle** together at **19010 E US 24 Hwy Independence, Jackson County, MO 64056**. Both **Powell** and **Riffle** were transported separately to 1125 Locust (Police Headquarters) to be interviewed by investigators. **Powell's appearance had significantly changed, his hair was cut down to a buzz cut and he had shaved his facial hair.**

Riffle confirmed she used methamphetamine recreationally. **Riffle** confirmed the subjects in the images were she and **Patrick (Powell)**, whom she'd been living with in Greenwood, MO for a few weeks with her two children, 18 months and 8 years old, because she is homeless. Initially **Riffle** denied any knowledge of any shooting/homicide. **Riffle** was then presented with the screen shots of the aforementioned business surveillance videos dated 11/11/17 and printed records of text communication dated 11/11/17 between **Riffle's** cell phone number and a number associated with the victim. **Riffle** then confirmed she had initiated the text contact regarding retrieving a handgun, she had previously requested to be held for her. Regarding the handgun, **Riffle** stated she had responded to a residence she could only describe as being in the area of Troost Av, but also stated it was an address she was previously familiar with because she used to live in the area of 40th and T roost Av. **Riffle** had previously responded to the residence and asked an unknown white female at the residence to hold the handgun for her. **Riffle** stated she had discovered the handgun in the vehicle she was driving (BMW) provided to her by Powell. **Riffle** stated the handgun made her nervous which is why she didn't want to be in possession of it. She later learned the handgun belonged to Powell's mother, and Powell wanted it back. **Riffle** initially stated she was able to recover the handgun from the residence, but later advised she had attempted to get the handgun back, but the same unknown white female stated the gun wasn't there. **Riffle** stated she then transported Powell back to the location to so he could retrieve the handgun himself, but she did not go to the residence with him, because she doesn't like confrontation. **Riffle** confirmed after Powell attempted to retrieve the handgun from the residence, Powell entered the BMW she was driving, depicted in the screen shots at the McDonald's parking lot, (just west of the crime scene). When asked what Powell said upon entering the vehicle, **Riffle** stated Powell said, "We're good," and they left the area in the BMW. **Riffle** denied knowing Powell shot anyone. **Riffle** was confronted with the fact the Witness stated she had in fact already returned the handgun to **Riffle** when **Riffle** had responded to the apartment to pick it up, and the Witness stated the shooting happened a short time after **Riffle** had left the apartment with the handgun. **There are text message between the victim and Riffle at 5:33 pm, where Riffle's phone texted the victim's saying "unlock the door it's raining."** The surveillance footage from this time confirms it was raining at this time.

The interview was then concluded when **Riffle** subsequently invoked her right to an attorney.

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Printed Name Det. Jeremy D. Wells Signature /s/ Det. 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.