

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

POLICE NO. :	KC21046451
PROSECUTOR NO. :	095465437
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
RAHMAN MICHAEL MUHAMMAD)	
2705 East 46th Street)	CASE NO. 2116-CR
Kansas City, MO 64130)	DIVISION
DOB: 11/12/1982)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y20200902.0)

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 July 13, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Shirley Muhammad caused the death of Shirley Muhammad by stabbing her.

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 (571.015-001Y20205212.0)

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 July 13, 2021, in the County of Jackson, State of

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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 dangerous instrument.

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.

Count III. Murder 2nd Degree (565.021-001Y20200902.0)

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 July 13, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Jaelin Letrell Ransom caused the death of Jaelin Letrell Ransom by stabbing 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.

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Count IV. Armed Criminal Action (571.015-001Y20205212.0)

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 July 13, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 3, 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 dangerous instrument.

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.

Count V. Murder 2nd Degree (565.021-001Y20200902.0)

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 July 13, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Tyla S Ransom caused the death of Tyla S Ransom by stabbing her.

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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 VI. Armed Criminal Action (571.015-001Y20205212.0)

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 July 13, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 5, 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 dangerous instrument.

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.

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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/ John G. Gromowsky
John G. Gromowsky (#50700)
Assistant Prosecuting Attorney
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Kansas City, MO 64106
(816) 881-3319
JGromowsky@jacksongov.org

WITNESSES:

1. DET Jonathan E. Cook, 1125 Locust, Kansas City, MO 64106
2. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
3. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
4. DET Joshua M. Gantt, 1125 Locust, Kansas City, MO 64106
5. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
6. Shirley Muhammad, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. Jaelin Letrell Ransom, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
8. Tyla S Ransom, 3232 Woodland Ave, Kansas City, MO 64109
9. DET Angelina M. Sanchez,
10. DET Ethan R Skinner,
11. DET Ephraim Vega, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07-17-2021

CRN: KC21046451

I, Detective Josh Gantt # 5772, of the 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 07-13-2021, at 3232 Woodland in
(Date) (Address)

Kansas City, Jackson Missouri Rahman M. Muhammad
(County) (Name of Offender(s))

a black male born on 11-12-1982 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07-15-2021, at 2104 hours, officers from the Kansas City, Missouri Police Department (KCPD) responded to 3232 Woodland, Kansas City, Jackson County, Missouri in regard to a welfare check. The calling party advised that an aunt who lived out of state called her and asked that she check on the aunt's mother who lived at the residence; the aunt's mother, was also grandmother to the calling party. The calling party advised that her aunt became concerned when the woman did not answer her repeated phone calls or the phone calls of other relatives; the calling party's aunt advised that she last spoke with the woman sometime three days prior. The calling party responded to the residence and attempted to make contact with the woman but her efforts were fruitless. The calling party heard her grandmother's dog barking from inside the residence but she saw no movement and walked around the exterior of the house to see that the residential back door was open. The calling party did not enter the residence and instead called the police.

Upon their arrival, the officers observed that the residence's front storm door was locked and, other than the aforementioned dog barking, there was no response to their repeated knocks. The officers walked to the rear of the residence and observed that the back door was open. The officers then made entry and verbally announced their presence inside of the residence. As the officers began to clear the first floor of the residence, they encountered a medium sized dog kenneled in a cage near the front (East) door. The officers turned toward the residence's stairway and observed a deceased black male (JR) in a seated position on the stair landing. JR's upper back was propped against the stair landing's northern wall ledge and his head was positioned back with his face looking upward; the officers observed that a \$100 bill was placed across JR's eyes. As the officers continued through the residence, the stairs took them to a second floor common area that led to four bedrooms; two on the east side of the common area and two on the west side of the common area. There was a common bathroom adjacent to the top of the stairway and a small closet to the east of the bathroom. As the officers proceeded through the common area, they observed apparent blood on the floor and walls.

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The officers continued on and located the body of a deceased black female (TR) in the southwest bedroom of the second floor. TR's body was lying supine on a bed and there was a \$100 placed on her forehead. Across the common area, in the southeast bedroom of the second floor, officer located the body of another deceased black female (SM). SM was positioned on her knees on the floor, with the side of her face pressed against the side of a bed mattress; the officers observed a \$100 placed on the back of SM head. No other bodies or parties were located inside of the residence.

KCPD detectives spoke with the calling party who provided the identities of the residents and advised that SM was the mother of both TR and JR. Through the course of the investigation, it was learned that all three parties were employed. SM was an employee of the Kansas City Area Transit Authority/RideKC and had been employed by them for approximately 20 years. Her last shift was on 07-13-2021 when she worked from approximately 0715 hours until approximately 1015 hours. SM was scheduled to work on 07-14-2021 and 07-15-2021, but she was a no call no show on both days. TR was employed through the Research Medical Center and last worked on 07-12-2021 from 1104 hours until 1911 hours. She was scheduled to work her next shift on 07-14-2021, but was a no call no show for that day. JR was employed with Uhaul and last worked on 07-13-2021 from 0458 hours until 1627 hours.

The calling party advised that SM recently expressed her concern regarding the aggression that her other son, Rahman M. Muhammad displayed toward her. SM told multiple family members that she was worried Muhammad was experiencing psychotic episodes and that he frequently said profane things to her. The calling party informed responding officers that Muhammad was released from prison last year; since the time of his release, the calling party witnessed Muhammad had verbally threatened to kill her brother.

Through the 16th Judicial Court of Jackson County, Missouri, KCPD detectives obtained a search warrant for the residence. KCPD crime scene investigators (CSI) responded to process the scene and recovered evidence. Detectives joined CSI inside of the residence and observed that the back door to the residence did not appear to be damaged or indicate forced entry. The kennel that held the aforementioned dog did not contain any animal feces or apparent urine.

There was apparent blood on the first floor wall adjacent to bottom of the stairs, as well as, throughout the stairway area leading up to the second floor. Apparent blood was also found throughout the second floor common area, near the entry to the stairs. On the floor of the second floor common area, to the west of the bathroom entrance, was a red handled, serrated kitchen knife with apparent blood on it; the blade of the knife was bent and the tip was broken off. The bed that held TR's body was saturated in apparent blood in the area underneath her body. The area of the floor underneath SM's body was also saturated in apparent blood.

Information obtained through the investigation, revealed that Muhammad was possibly staying at his deceased father's residence located at 2705 E 46th Street. On 07-16-2021, at approximately 0241 hours, KCPD patrol officers responded to the address and observed Muhammad sitting on the front porch. The officers were aware of Muhammad's possible ties to the incident at 3232 Woodland and stopped to contact him. During their contact with him, Muhammad spontaneously asked the officers if they could take him to 32nd Street and Woodland because something happened to his family and he needed to see them. KCPD detectives were

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notified and responded to the residence on 46th Street. The detectives contacted Muhammad and he agreed to voluntarily speak with them at KCPD headquarters.

During the interview with the detectives, Muhammad advised that he had not been to SM's residence since sometime on 07-12-2021 and indicated that was the last day that he had contact with SM or TR; Muhammad could not recall the last time that he saw JR, because he (JR) was at work at that time.

The detectives then observed what appeared to be fresh lacerations to Muhammad's hands and apparent blood on his clothing; Muhammad was placed on an investigative arrest and transported to the KCPD East Patrol Detention. Through the 16th Judicial Court of Jackson County, Missouri, detectives obtained warrants for Muhammad's clothing, buccal standard for his DNA, and for photographs of him and his clothing; with the assistance of crime scene personnel, the warrants were executed and the items were recovered.

While at East Patrol Detention, Muhammad's property was inventoried. Included in Muhammad's property were a black, Samsung cellular phone and multiple sets of keys. One of the set of keys was attached to a lanyard that read Class of 2016; the lanyard itself held numerous key chains. Attached to one of the key chains was a key fob and two keys to a Hyundai vehicle; a yellow laminated tag, commonly associated with car dealerships, was also attached to that key chain. The yellow tag had limited vehicle information written in marker that was partially smudged or missing; part of the information on the tag was legible and read that the vehicle was a 2013 Hyundai. The calling party and other relatives at the scene advised that TR's vehicle was not at her residence on Woodland and was unaccounted for; TR's vehicle was identified as a black 2013 Hyundai Accent (bearing Missouri Temporary Tag: 05K13M and VIN: KMHCT4AE2DU445355). The last sighting of TR's vehicle was on 07-13-2021, at 1856 hours, when it was observed travelling southbound through the intersection of 18th Street and Prospect. Footage of the vehicle going through the intersection at that time showed that the driver was a tall party, with dreadlock/braided hair, wearing a white shirt; the driver description is observable due to the driver's seat being extended rearward toward the back seat. The physical characteristics of the driver are similar to Muhammad. TR's boyfriend was contacted and advised that she stayed overnight at his residence on 07-12-2021 and she drove her vehicle back to her residence on Woodland sometime during the morning of 07-13-2021. Friends and relatives also confirmed that TR graduated from high school in 2016.

Through the 16th Judicial Court of Jackson County, Missouri, detectives obtained a search warrant for the Samsung cellular phone located in Muhammad's property. The warrant included GPS data for Muhammad's phone and detectives were able to obtain that information from the phone's carrier, ATT. A preliminary mapping of the phone's coordinates indicated that it was in the area of homicide on 07-13-2021 between 1300 hours to 1700 hours. Subscriber information for the phone listed Muhammad's mother, SM, as the account user/billing party.

A supervisor from the KCPD-Crisis Intervention Team contacted area hospitals to see if Muhammad was assigned a case worker and receiving mental health treatment. While in contact with the Truman Medical Center-2300 Charlotte, the supervisor was advised by staff that Muhammad arrived at that location on 07-13-2021, at approximately 2000 hours, and sought medical care for wrist pain caused by "rough housing" with

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some friends. Muhammad remained at the medical center until about 0200 hours on 07-14-2021 when he left prior to receiving medical care.

Through the 16th Judicial Court of Jackson County, Missouri, detectives obtained a search warrant for the residence located at 2705 E 46th Street. Personnel from CSI responded to the scene where they sprayed luminol throughout the residence for the presence of blood. Multiple areas of the residence showed positively for the presence of blood. Located in the northern-most second floor bedroom were a pair of plaid boxer shorts that tested positively for the presence of blood near the waistband area; included in the same bedroom as the boxer shorts were documents addressed to Muhammad. Personnel from the KCPD Crime Laboratory completed a DNA comparison for the bloodstained area of the boxer shorts; the comparison found that JR was as a major contributor. Per the analysis, the genetic information from the bloodstained boxer shorts was 21 octillion times more likely to be observed if JR and an unknown individual are the contributors than if two unknown individuals are the contributors. Per the analysis, Muhammad was shown to be a minor contributor; the genetic information from the bloodstained boxer shorts was 170 trillion times more likely to be observed if RAHMAN MUHAMMAD and an unknown individual are the contributors than if two unknown individuals are the contributors.

Printed Name Det. Josh Gantt - 5772 Signature /s/ Det. Josh Gantt #5772

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

Judge

Circuit Court of _____ County, State of Missouri.