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

DOI ICE NO . VC21061102

KC21001103
095466551
HS028637
)
NTIFF,)
)
)
)
) CASE NO. 2116-CR
) DIVISION
)
)
)
NDANT.)

COMPLAINT WARRANT REQUESTED

Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-003Y20200999.0)

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 September 11, 2021, in the County of Jackson, State of Missouri, Sheybeon Wyatt-Thompson was killed by being shot as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030(9), RSMo, committed by the defendant on or about September 11, 2021, in the County of Jackson, State of Missouri.

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 September 11, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count I, 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.

Count III. Discharge/Shoot Firearm At Or From Motor Vehicle/Shoot At Person, Another Motor Vehicle, Or Building/Habitable Structure- Persistent Offender (571.030-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class B felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about September 11, 2021, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons, namely , , , or

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 11, 2021, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to by shooting

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 V. 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 September 11, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count IV, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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 571.015.1, 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 VI. Assault 1st Degree Or Attempt (565.050-002Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 11, 2021, in the County of Jackson, State of Missouri, the defendant shot at substantial step toward the commission of the offense of assault in the first degree of and was done for the purpose of committing such assault.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count VII. 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 September 11, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count VI, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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 571.015.1, 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 VIII. Assault 1st Degree Or Attempt (565.050-002Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 11, 2021, in the County of Jackson, State of Missouri, the defendant shot at a substantial step toward the commission of the offense of assault in the first degree of and was done for the purpose of committing such assault.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IX. 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 September 11, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count VIII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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 571.015.1, 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.

JEAN PETERS BAKER

Prosecuting Attorney Jackson County, Missouri by,

/s/ John G. Gromowsky
John G. Gromowsky (#50700)
Assistant Prosecuting Attorney
415 East 12th Street
Floor 7M
Kansas City, MO 64106
(816) 881-3319
JGromowsky@jacksongov.org

64106

64106

WITNESSES: DET Jonathan E. Cook, 1125 Locust, Kansas City, MO 64106 DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106 3. E 12th St, Floor 11, Kansas City, MO 64106 DET Joshua M. Gantt, 1125 Locust, Kansas City, MO 64106 5. 64106 6. O Mitchell N. Kelloff, 1125 Locust, Kansas City, MO 64106 DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106 9. , Floor 11, Kansas City, MO 64106 10. DET Jacqulynn R. Mutschler, 1125 Locust, Kansas City, MO 64106 11. DET Ethan R Skinner, 1125 Locust, Kansas City, MO 64106 64106 13. DET Ephraim Vega, 1125 Locust, Kansas City, MO 64106 Kansas City, MO 64106 Kansas City, MO 64106

Kansas City, MO

Kansas City, MO

18. Sheybeon Wyatt-Thompson, 11204 East 59th Ter, Kansas City, MO 64133

PROBABLE CAUSE STATEMENT FORM

Date: 10/01/2021				CRN: KC21061103	
I, Detective J. Mutschler #5594					
(Name and identify law enforcement officer	, or person ha	ving information	on as p	probable cause.)	
knowing that false statements on this for	m are puni	shable by law	v, stat	te that the facts contained herein	are tru
I have probable cause to believe that on	09/11/202	.1	, at	6720 Manchester Ave	
	(D	ate)		(Address)	
Kansas City, Jackson	Missouri	Roy L. Bros	adus		
(County)				(Name of Offender(s))	
Black Male 01/03/1992			com	mitted one or more criminal offer	nse(s).
(Description of Identity	7)				
The facts supporting this belief are as fol	lows:				
On 09/11/2021 at 2144 hours, Officers were dis Missouri in regard to a shooting. An update wa nvolved in the shooting.					
An Officer advised he observed a vehicle match conducted an area canvass, and located a mark (ansas City, Jackson County, Missouri. While proken/missing. Officers attempted to conduct altimately ended at Research Medical Center. A Cherokee bearing a Missouri license plate CU4 The passenger, later identified as Sheybeon Was later pronounced deceased. In the passenger here were two firearms inside the Jeep Grand in between the driver's seat and center consoler.	roon Jeep G behind the v a traffic stop After the pur IF5C, VIN: 1 yatt-Thomps ger compart Cherokee.	rand Cherokee ehicle, Officer on the vehicle suit ended, the J4HR58N55C son was obser ment of the ve	e drivi	ing west bound on Gregory and Elmiced the rear window appeared to be it refused. A pursuit was initiated an icle was identified to be a red Jeep 0 09 registered to the driver, Roy Bro o have an apparent defect to the her there was apparent blood. In plain was	wood, d Grand adus. ad and view,
Additional Officers responded to 6720 Manches who was suffering from a gunshot wound, along			kson	County, Missouri where they contact	ted
The crime scene was observed to span from 6 lackson County, Missouri. In the street in front observed damage to two vehicles in the drivew sidewalk in front of the listed address. To the solution and the street and street and shall call of the second street and st	of 6715 Mai ay of 6720 I outh, I obse	nchester Ave, Manchester Av ved a broken	I obse ve con mirror	erved (13) 40 caliber shell casings. In sistent with gunfire, and blood on the	ie .
was transported to an area hospital for his is collowing: While standing outside with and and speed. Advised he believed the Jeep struck he Jeep stopped to the south of them and the shot four to five times before returned fire officers, at the hospital, upon his arrival.	he observed in self-defe	erved a red Je which possibly the vehicle arnse. advise	leep C ly dam ind beg ed he	therokee south bound at a high rate haged the driver's side mirror. ad adgan firing at them. advised Broad observed the same Jeep roped off the same J	of vised dus

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Detectives made contact with who advised the following: While she, and were standing near service parked in the street, she observed a red Jeep south bound at a high rate of speed. Advised as the red Jeep passed them, struck the mirror, ultimately knocking it to the ground. Advised the red Jeep came to a stop down the street from their location. The moved towards his driver's side door at which time they began to hear gunshots. Advised she and the ran towards her residence where she took cover behind a tree. Advised she observed the driver's side door open, and observed a silhouette, who she believed to be a male. Stated she observed muzzle flashes coming from the silhouette.						
Detectives made contact with and advised him of his Miranda Warning. Stated the following: While he, and were standing near his vehicle parked in the street, he observed a dark colored vehicle, possibly a Jeep, traveling at a high rate of speed. After the gesture was made advised the vehicle swerved towards him and the others standing near his truck. As the vehicle passed by, advised he used his hand to strike the mirror, ultimately knocking the mirror off the vehicle. The vehicle stopped down the street, at which time he entered his vehicle with the intent to leave but instead removed his Sig Sauer handgun. The heard multiple gunshots and observed and flee and run towards residence. Advised he observed a silhouette on the driver's side of the vehicle. Advised he observed two muzzle flashes coming from the silhouette. Advised he aimed his handgun at the silhouette and fired an unknown number of times. After the exchange of gunfire, the silhouette entered the driver's side of the Jeep believing it was leaving the scene.						
Detectives made contact with Broadus and advised him of his Miranda Warning. After being advised of his Miranda Rights, Broadus requested a lawyer. While in the interview room with Broadus , Detectives noticed apparent blood on his clothing. After detectives left the room where Broadus was seated, he made statements indicating self-defense.						
Detectives made contact with who advised the following: She was contacted by and and advised Broadus and Sheybeon Wyatt-Thompson arrived at seriodence injured.						
Detectives made contact with who advised the following: On 09/11/2021 at approximately 2135 hours to 2145 hours, he heard honking at his residence. went outside and observed Broadus' maroon Jeep Cherokee. advised Broadus was outside of the vehicle, holding Sheybeon Wyatt-Thompson, who was seated in the front passenger seat, while asking for help. advised Sheybeon Wyatt-Thompson was leaning into the Jeep, not talking, with blood on his chest. further advised he observed Broadus' "peanut butter Glock" inside the vehicle, that he has known him to have for approximately two to three years. advised he went inside in order to get his cell phone and called . Once he walked back outside, the Jeep, Broadus and Sheybeon Wyatt-Thompson were gone.						
Detectives made contact with who also advised Broadus is known to carry a "peanut butter 9".						
A Search Warrant was executed on the red Jeep Grand Cherokee bearing a Missouri license plate CU4F5C, VIN: 1J4HR58N55C629209. While processing the vehicle, Broadus Missouri Driver's License was located on the driver's side floor board underneath the mat.						
Printed Name Detective J. Mutschler #5594 Signature /S/ Detective J. Mutschler #5594						
The Court finds probable cause and directs the issuance of a warrant this day of						

PROBABLE CAUSE STATEMENT FORM

	Judge		
Circuit Court of		County, State of Missouri.	

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