



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

<b>POLICE NO. :</b>	21-081056
<b>PROSECUTOR NO. :</b>	095467504
<b>OCN:</b>	qo007398

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ELIJAH L SOLIZ</b>	)	
<b>804 E Devon St</b>	)	<b>CASE NO. 2116-CR</b>
<b>Independence, MO 64055</b>	)	<b>DIVISION</b>
<b>DOB: 03/28/2002</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**AMENDED COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Involuntary Manslaughter 1st Degree (565.024-001Y20200999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the **class C felony of involuntary manslaughter in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 11, 2021, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of  by shooting him.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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.

**Count II. Armed Criminal Action (571.015-001Y20205299.0)**

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 December 11, 2021, in the County of

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Jackson, State of Missouri, the defendant committed the felony of Involuntary Manslaughter in the First Degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Involuntary Manslaughter in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served. 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 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 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/ Alison Schenkelberg  
Alison Schenkelberg (#69325)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3582  
AESchenkelberg@jacksongov.org

**WITNESSES:**

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. [REDACTED]
3. PO Katherine Gentile (Tyc), 223 N. Memorial Drive, Independence, MO 64050
4. [REDACTED]
5. PO Kenneth Gibson, 223 N. Memorial Drive, Independence, MO 64050
6. PO Scott Grasher, 223 N. Memorial Drive, Independence, MO 64050
7. [REDACTED]

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8. [REDACTED]

10. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050

11. DET Jeffery Pagel, 223 N. Memorial Drive, Independence, MO 64050

12. CST Kelly Pope, 223 N. Memorial Drive, Independence, MO 64050

13. PO Brian Weiter, 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 12/12/2021

Report #: 2021-81056

I, Christopher Burris, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 12/11/2021, at approximately 1859 hours, Elijah L. Soliz, (Race- White, Sex- Male, DOB- 03/28/2002, Address-804 Devon Street, Independence, MO 64055, [REDACTED]), committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 12/11/2021 at 1859 hours, Independence Police Officers and EMS were dispatched to 600 North Westwood on a shooting.

Upon arrival, Independence Police Officer Scott Grasher observed several unidentified subjects standing out in the front yard area. Several officers were already inside the residence with a fifteen-year-old victim, later identified as [REDACTED]. Officer Grasher identified the subjects outside as [REDACTED], [REDACTED], Elijah L Soliz, and a 14-year-old juvenile male [REDACTED].

EMS tended to the victim. The victim was subsequently transported to an area hospital with critical injuries from a gunshot wound to the head. The victim later died at 2305 hours.

Officer Grasher first spoke with [REDACTED]. [REDACTED] stated that this was his wife's residence and that he was downstairs playing video games when he heard a gunshot from upstairs. [REDACTED] said he ran upstairs and saw [REDACTED] laying on the floor with blood coming from his head. [REDACTED] said he called 9-1-1. [REDACTED] stated he did not know what happened.

Officer Grasher spoke with [REDACTED]. [REDACTED] stated that he was in his bedroom playing video games and heard a gun go off. He went to the living room and saw [REDACTED] on the floor with blood coming from his head. [REDACTED] also stated he did not know what happened.

Officer Grasher then spoke with Elijah Soliz. "We was messing with the gun and he got shot in the head." When Officer Grasher asked Soliz who shot the victim, Soliz admitted that it was him who pulled the trigger. When asked by Officer Grasher how it happened, Soliz said he was just holding the gun and it went off.

Officer Grasher spoke with [REDACTED] who stated he was in the living room playing on his phone when he heard a gunshot. [REDACTED] said he looked up and saw [REDACTED] laying on the floor with blood coming out of his head.

Investigators were summoned to the scene. Investigators obtained consent to search the residence from [REDACTED] and [REDACTED]. Upon processing the scene, Detective Burris could smell what he believed through his training and experience, the odor of burnt marijuana in the living room, where this incident was reported to have happened. During the search of the residence a Ruger SR .22 caliber pistol, a Taurus G3C pistol and Radical Firearms RF15 rifle were found and recovered, in addition to ammunition. A spent .22 caliber shell casing was found and recovered from the living room floor.

Detectives Chris Burris and Kurt Wyckoff interviewed Soliz after he was advised of his Miranda rights. Soliz identified the victim as his best friend. Soliz admitted to shooting the victim accidentally with a friend's gun. Soliz advised the picked up the gun from the coffee table and it dropped, while he was trying to put it away in a nearby closet. Soliz stated when he caught the gun, the gun went off and it hit the victim. Soliz identified the gun used to shoot the victim as .22 caliber firearm. Soliz admitted to smoking marijuana earlier in the evening

but denied using any other substances legal or illegal. Soliz identified himself, the victim, [REDACTED] his girlfriend as being present in the living room when the incident happened. Soliz's girlfriend, left the scene prior to the arrival of investigators.

On 12/15/2021, the mother of [REDACTED] contacted Detective Burris and informed him that [REDACTED] had additional information about this case that he had not previously disclosed. [REDACTED] was interviewed a second time in the presence of his mother. [REDACTED] said that prior to the shooting "[REDACTED]" asked to see the gun. [REDACTED] described the gun as being a pink semi-automatic pistol. [REDACTED] told me that "[REDACTED] a" was holding the gun and looking at it or what he described as "messaging" with it. [REDACTED] told me "[REDACTED] cocked the pistol." Detective Burris asked "[REDACTED]" to explain to me what that meant. [REDACTED] C" stated that [REDACTED] pulled the slide back on the pistol or "racked the slide." Detective Burris asked "[REDACTED]" if [REDACTED] said anything before that and he said no.

[REDACTED] advised "[REDACTED]" gave the pistol to Elijah and "he had it for a minute." "[REDACTED]" told Detective Burris that Elijah and [REDACTED]" began to "argue" however he said that "we play like that" indicating it wasn't a real argument rather just banter. "[REDACTED]" told Detective Burris that Elijah then aimed the pistol at [REDACTED] [REDACTED]" told Detective Burris that Elijah "didn't know there was one up top." [REDACTED]" then said he was not sure if Elijah knew or not.

[REDACTED]" told Detective Burris that Elijah was aiming the gun at [REDACTED] and messing with the "hammer" on it, trying to release the hammer when it slipped off his thumb and the pistol shot. [REDACTED]" stated that Elijah had the pistol pointed at [REDACTED]" head for about 30 to 45 seconds prior to the shooting. "[REDACTED]" told Detective Burris that he did not believe the shooting was intentional.

Detective Christopher Burris # 1401

/S/ Christopher Burris

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Print Name

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Signature