# IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

DOLL	CENIO	TT 00 1 0 1	<b>5</b> 0.40
POL	ICE NO.:	KC2101	17942
PROSECUT	OR NO.:	0954666	585
	OCN:		
STATE OF MISSOURI,			)
	PLAIN	TIFF,	)
VS.			)
EDWARD T SHELTON			<i>)</i> )
3408 East 72nd Street			) CASE NO. 2116-CR
Kansas City, MO 64132			) DIVISION
DOB: 05/17/2004			)
Race/Sex: B/M			)
	DEFENI	DANT.	) )
	COMP	LAIN	<u>T</u>

# <u>COMPLAINT</u> WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 March 20, 2021, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, knowingly or with the purpose of causing serious physical injury to D.N. DOB 8/5/2005 caused the death of D.N. by shooting 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 (571.015-001Y20205213.0)**

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

#### **State vs. Edward T Shelton**

571.015.1, RSMo, in that on or about March 20, 2021, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, 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 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 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.

# Count III. Murder 2nd Degree (565.021-001Y20200903.0)

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 March 20, 2021, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, knowingly or with the purpose of causing serious physical injury to D.S. DOB 5/2/2005 caused the death of D.S. DOB 5/2/2005 by shooting 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.

#### **State vs. Edward T Shelton**

# **Count IV. 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 March 20, 2021, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, committed the felony of murder in the second degree charged in Count III, 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 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 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.

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.

#### **State vs. Edward T Shelton**

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/ Jamie K. Hunt Jamie K. Hunt (#50401) Assistant Prosecuting Attorney 415 E. 12th Street Floor 7M Kansas City, MO 64106 jhunt@jacksongov.org

## **WITNESSES:**

- 1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
- 2. B.D., Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 3. Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 4. DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106
- 5. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 6. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
- 7. DET James H. Price, 1125 Locust, Kansas City, MO 64106
- 8. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
- 9. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
- 10. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
- 11. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

# FILED PRC BABLE CAUSE STATEMENT FORM 23-Dec-2021 12:40

Date: 12-23-2021

CIRCUIT COURT OF JACKSON COUNTY, MO
BY ESSI (M. J. M. M.) DCA

CRN:	KC21017942	
		_

I, Detective Ryan Taylor, #5585	- KCPD Homicide Uni	it
---------------------------------	---------------------	----

(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 03-20-2021 , at 7319 Norton Avenue in (Address)

Kansas City, Jackson Missouri Edward T. Shelton
(County) (Name of Offender(s))

B/M 05-17-2004 committed one or more criminal offense(s).

- Murder
- Armed Criminal Action

The facts supporting this belief are as follows:

On 03-20-2021 at approximately 2228 hours, officers of the Kansas City Missouri Police Department were dispatched to a shooting at 7319 Norton Avenue, Kansas City, Jackson County, Missouri. Upon arrival officers located Dominique Nelson, victim #1, deceased from multiple gunshot wounds. Dominik Simmons, victim #2, was discovered in the early morning the following day deceased from a single gunshot wound to the back.

The Jackson County Medical Examiner's Office ruled the manner in both deaths a homicide.

While canvasing the neighborhood, detectives located security video at a residence of the Norton. When the video was reviewed it showed that at approximately 2225 hours a silver Ford EcoSport arrives east on 73rd street and parked. Shortly after it parked three individuals are observed running from the EcoSport and south on Norton where two of the individuals shot and killed both victims. During the course of the shooting, the EcoSport repositions to Jackson Avenue and turns north and parks again. After the shooting, the three individuals then ran north on Norton, east on 73rd and then north on Jackson Avenue and got back into the EcoSport. The EcoSport then drove north on Jackson out of camera view.

Detectives then utilized city cameras where the EcoSport was observed driving north on Jackson and then turns east on Gregory. The EcoSport was observed on multiple cameras along Gregory Boulevard at Elmwood, Oldham and Oakwood, until it is no longer in camera view.

The case detective contacted the State of Missouri's Department of Revenue and requested a list of all registered Ford EcoSport vehicles in Jackson County, Clay County, and Platte County. Detectives then reviewed the list provided, conducting computer checks of the license plates in a License Plate Reader (LPR) in the area of the homicide. Detectives came across the Missouri license plate BE2B1Z which showed a "hit" on a silver Ford EcoSport driving eastbound at 75th and Prospect on the night of the homicide at 2150 hours.

# PROBABLE CAUSE STATEMENT FORM

Upon further review there are LPR hits on the license plate to plot the course of the Ford EcoSport prior to the

CRN	KC210	17042
CILIA	INCZIU.	11342

homicide as well as its locations afterwards. A review of the LPR hits showed that on the night of the homicide the Ford EcoSport hit the LPR reader at 75th and Prospect just prior to the homicide. Utilizing the LPRs and city cameras, detectives were able to place the EcoSport at 75th and Troost eastbound, and then the area of 82nd Terrace and Troost and 89th and Troost prior to the homicide. After reviewing the LPR hits of the EcoSport detectives noted that the vehicle was typically in the area of 89th and Troost in the days prior and following the murder. Detectives utilized DOR resources and determined that the vehicle was a rental from Enterprise in Grandview, MO. Detectives then contacted the Enterprise Law Enforcement Resource line and asked for rental information on the vehicle. Enterprise advised that the Ford EcoSport was rented to an at the time on the provided Enterprise with the address of 1208 E 89th Street, Apt 2E (the provided homicide. address is near the intersections of 82nd and Troost and 89th and Troost where the EcoSport was hitting on the LPRs). Additionally, 1 provided Enterprise with her phone number as 816-562-7589. Detectives interviewed who stated that admitted to them he sold Marijuana to the victim #1 (Nelson). He also told them she usually has a firearm. He also reportedly told them that the night both victims were killed, he was in his vehicle (in the driveway), an unknown person or persons was shooting from the side of his house. Detectives interviewed who provided screenshots from Facebook account of user "Pooder Solowke" (Per Facebook the account is under the name Edward Shelton. Additionally, I provided a photograph of two young males identified as Edward and Detectives interviewed who advised she had learned through word on the street that the individuals involved with the homicide were twins and went by the names of and Edward Shelton and one goes by the moniker "Poodie." provided photographs of the individuals she believed to be the twins. One of the photographs provided shows one of the Shelton's with the SnapChat handle of "PoodieABM." Detectives reached out to KCPD School Resource Officers to attempt to identify the Shelton's through school records due to their age. PO Swope provided the names of and Edward Tyrone Shelton B/M 05-17-2004. PO Swope provided a school picture of Edward Shelton from a school year book. Upon viewing the photograph I was able to clearly identify Edward Shelton as one of the "twins" in the picture provided by Shelton's Southeast High school records indicated that Shelton's mother is listed as Detectives contacted BD who advised on the day of the homicide he walked to Dominique Nelson's house, he forgot his phone at his residence so they walked to his house on stated that "Domo" was at the house too. Norton Avenue. Stated that they did not go anywhere else between Nelson's residence and his. that he observed three unknown individuals run down the street and shoot at both victims. DUREN stated that one of the suspects dragged Dominique into the street and shot her multiple times.

Detectives interviewed who stated that the victims were walking down Jackson Avenue and walked past the suspect's residence, he stated that Nelson knew that they didn't like so she was trying to do some "tough

guy shit." The victim's jumped fences to get to the area of 74th and Norton near sesidence.

# PROBABLE CAUSE STATEMENT FORM

CRN KC21017942

to ask if he could give them a ride back to the victim's house. It stated that he felt like somebody was going to die. Walked up to wal
stated that the "12 year old" was the one who shot Dominique Nelson. was unsure if she was shot at that point. The 12 year old pointed a gun at Nelson's head and said "bitch, where did your friend's go?" Nelson responded "come on bro, you know I don't know, when you started bustin' (shooting) I got down." stated that is when the 15 year old walked up and said "fuck all that talking" and shot Nelson in the face and body, then the 12 year old emptied his whole "clip" into Nelson. When the suspects ran off they were yelling "gang!" as an expression of happiness.
stated that he didn't initially know who the suspects were but he saw their faces clearly, he stood outside his vehicle and watched the whole incident happen. It stated that he looked into the suspects and found their picture on social media. It described the suspect's vehicle as a silver SUV. It stated that the suspect's house is at 73rd and Indiana across the street from a barber shop. It then gave the SnapChat name for one of the suspects as "PoodieABM" and provided a photograph of the suspect from his cellular device. It gave detectives permission to take a picture of the photograph in his cellular device. It stated that was the 12 year old that he observe shoot the victim. It was shown a photographic lineup consisting of six black males all similar in appearance. It dentified photo # 4 (Edward T. Shelton B/M 05-17-2004) as the individual who shot and killed Dominique Nelson.
Detectives utilized the KCPD police report writing system and observed an aggravated assault report written in 2020 that listed Edward T. Shelton as having a phone number of 816-529-6087. Detectives reached out to KCPD school resource officers who advised that Edward T. Shelton's Southeast High school records indicated that Shelton's mother is listed as Detectives then utilized an information database and input Shelton's listed phone number. The result of that searched showed the owner of the phone line as f Edward Shelton.
The Jackson County Circuit Court granted a court order for the phone records for 816-529-6087 from AT&T.
The results of the phone records were provided to detectives, who then provided the records to PO Daneff. Those records were entered into a program to map the location of the cellular device during and after the homicide. The records showed that the cellular device was in the area of the homicide on the date and time of the reported shooting. The cellular device then travel south towards the area of Grandview, MO.
Detectives contacted who stated that she rents vehicles typically from Enterprise in Grandview. was shown a photograph of the silver Ford EcoSport captured on the LPR system to which she confirmed that she did rent that vehicle in March of 2021. stated that she let other people drive her vehicles. Detectives asked her who specifically was driving the vehicle on March 20th, 2021. The reporting detective asked when took the vehicle and she stated that he had it the whole day.

# PROBABLE CAUSE STATEMENT FORM

CRN KC21017942

Detectives contacted who stated that his child's mother rented a silver SUV for him. It should be noted that was shown a screen shot of the Ford EcoSport being driven on the night of the homicide, which he identified as the vehicle he was driving.
stated that he and left residence and went to 72nd and Indiana to pick up their friend (16 years old) and his brother (15 years old).
While driving around, they saw "", who was someone they didn't like, walking around 72nd near Jackson with three or four other people. Stated that was believed to be responsible for previously shooting up Pooder's mother's residence. Was told by "hold on, hold on we are about to get out and fight." Stated that he parked his car on 72nd street, by Knotts Elementary School (7301 Jackson Avenue) and stayed in the car. heard gun shots and observed all with handguns while coming back to the vehicle. While riding in the vehicle, stated "fuck man, we did some bad shit man." The reporting detective asked to clarify what stated, stated that just killed somebody. Pooder stated in the vehicle "man, I can't believe we just killed these people." told "I can't believe you did this shit out of my baby momma's car, what the fuck" to which stated "my fault, bro." stated "her wood Apartments in Grandview.
was shown two separate photographic line ups consisting of six black males all similar in appearance. In the first line up identified photograph number 6 (BM 06-19-1997). In the second line up identified photograph number 4 (Edward Shelton B/M 05-17-2004) AKA "Pooder."
On 09-29-2021, Edward T. Shelton was arrested. Mr. Shelton was transported to 1125 Locust Street, Police Headquarters to provide a formal statement. Mr. Shelton's right to council was invoked by his guardian.
Detectives collected a buccal swab from Edward T. Shelton and was sent to the KCPD crime lab for DNA comparison to physical evidence collected in investigation. On 11-09-2021 the KCPD crime lab provided a report stating that Edward T. Shelton's DNA was present on Hornady 9mm Lugar casings recovered from the south on Norton near victim #1.
Printed Name Detective Ryan Taylor, #5585 Signature 1,#5585  The Court finds probable cause and directs the issuance of a warrant this day of
Judge
Circuit Court of County, State of Missouri.