

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

POLICE NO. :	KC22007796
PROSECUTOR NO. :	095469068
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
ISAIAH L THOMAS	)	
5732 Olive St.	)	CASE NO. 2216-CR
Kansas City, MO 64130	)	DIVISION
DOB: 11/27/2002	)	
Race/Sex: B/M	)	
	)	
	)	
DEFENDANT.	)	

COMPLAINT
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 February 2, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Shariff Tilghman caused the death of Shariff A Tilghman by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Shariff Tilghman as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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)

State vs. Isaiah L Thomas

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 February 2, 2022, in the County of Jackson, State of Missouri, the defendant knowingly committed the felony of murder in the second degree charged in Count One, 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

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 A felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about February 2, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a Nissan Maxima, and as a result of the above described conduct, Shariff Tilghman suffered injury or death.

State vs. Isaiah L Thomas

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.

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/ Jeannette Wolpink

Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
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WITNESSES:

1. DET Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106
2. DET Robert D. Guffey, 1125 Locust, Kansas City, MO 64106
3. DET Judith M. Harris, 1125 Locust, Kansas City, MO 64106
4. DET Ian D. Hobbs, 1200 E. Linwood, Kansas City, MO 64106
5. DET Kari E. Mutschler, 1125 Locust, Kansas City, MO 64106
6. Shariff A Tilghman, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 4/6/22

CRN: KC22-7796

I, Detective K. Mutschler #5702 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 2/2/22, at 7219 E. 17th Street in
(Date) (Address)

Kansas City, Jackson County Missouri Thomas, Isaiah L.
(County) (Name of Offender(s))

B/M 11/27/02 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 2/2/22 at approximately 2124 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 7219 E. 17th Street Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, Officers located a male in the driver's seat of a black Nissan Maxima bearing Kansas license plate 734 MJR, suffering from apparent trauma. The Maxima was still running and the vehicle was in drive, but had been crashed into a snowbank in an industrial area. KCFD EMS responded to the scene and declared the male deceased. Multiple projectile holes that had entered from the exterior were observed in the passenger side of the Maxima and nine spent 9mm shell casings were located on the ground in the vicinity of the vehicle. The Jackson County Medical Examiner has ruled the death a homicide. No witnesses were located at the scene.

The investigation revealed the Nissan Maxima was a reported stolen auto from Junction City, Kansas on 2/2/22. The reporting party for the stolen auto report advised the car was stolen by her boyfriend (identified as the deceased victim).

Recovered video surveillance from the area of the homicide revealed the victim's vehicle arrive at the location at approximately 2022 hours. The vehicle is stationary for approximately 3 minutes before a subject appears to exit the passenger side of the vehicle and stands in the vicinity where the spent shell casings were located. A few seconds later, the subject is observed running eastbound away from the victim's vehicle. Where the subject exits the vehicle is unclear because the headlights of the vehicle washout the view of the camera. As the subject is seen running away from the area, the victim's vehicle is seen rolling to a stop where it was discovered by police. The subject is seen returning to the victim's vehicle for a moment, and then is seen running eastbound along 17th Street until the subject jumps the chain link fence and enters the northeast corner of 7219 E. 17th Street. The subject is observed to be wearing dark clothing with an unknown white design on the chest and an unknown white colored object is observed near their hand.

Recovered video surveillance from other locations revealed a passenger inside the victim's vehicle at multiple gas stations approximately an hour before the homicide. The passenger appears to attempt to purchase tobacco

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from the counter, but walks away after the cashier asks for ID. The passenger was a black male wearing a medical mask, black and gray camouflage hoodie with "Reebok" and the Reebok symbol in white across the chest, charcoal gray sweat pants, and gray tennis shoes. The passenger also had a white medical wrap/cast on their left hand. The clothing and white wrap/cast of the passenger is consistent with the subject observed on surveillance running from the victim's vehicle.

On 2/9/22 Detectives returned to 7219 E. 17th Street and obtained a consent to search for the property to search the area where the subject was observed jumping the fence. Utilizing an ATF Special Agent Canine, Detectives located three live 9mm rounds with a head stamp that matched shell casings located at the scene. They also located charcoal gray sweatpants similar to what the passenger was observed wearing, an empty gun magazine, and a 9mm Stoege handgun. All the items were in different areas on the property, indicative of prohibiting their discovery, approximately a block from where the victim's vehicle was discovered. The recovered Stoege 9mm firearm was compared to the spent shell casings recovered from the homicide scene and determined to have been fired from the recovered firearm.

A gun trace of the serial number of the Stoege 9mm firearm located near the homicide revealed the gun was purchase on 5/26/21 by [REDACTED] B/F 11/15/1967 with an address of 5732 Olive Street Kansas City, Missouri 64130. A computer check of 5732 Olive Street responded back to **Thomas, Isaiah B/M 11/27/02** (19 years old not old enough to purchase tobacco) with a phone number of 816-845-7227. Reports indicated [REDACTED].

After identifying **THOMAS**, Members of the Kansas City Missouri Police Department conducted surveillance on him in an attempt to identify any injuries and medical equipment consistent with what was observed in surveillance video. On 3/14/22 **THOMAS** was observed leaving a residence in vehicle with an expired license plate. Uniformed Officers conducted a traffic violation on the vehicle and contacted **THOMAS**, who was in the passenger seat. An Officer observed a large lump on **THOMAS'** left hand, but no cast. When asked about the injury, **THOMAS** stated he had surgery on his hand in February and had a cast on it, but he took it off early.

A review of the victim's call data records revealed two outgoing calls to **THOMAS** on the date of the homicide. Detectives tracked the victim's car and identified multiple locations where the vehicle was within the hour leading up to the homicide. Comparing the victim's call data records to **THOMAS'** revealed they both were utilizing cellular towers in the same geographical area at times consistent with where the victim's car is known to have been located. Furthermore, the phone number associated to **THOMAS** utilizes a geographical cellular tower that has cell site coverage of the address where the homicide occurred around the time of the homicide.

On 3/28/22 at approximately 0915 hours, I received a lab report notification indicating **THOMAS** was a contributor of DNA on a swab from a blue and white face mask located on the front passenger floorboard of the victim's vehicle. The lab report states "the DNA results provide very strong support for the scenario that Isaiah **THOMAS** is a contributor of DNA from Item 038.1 (swab from blue and white mask right front floor) versus the alternative scenario. The genetic information from item 038.1 is 6 septillion times more likely to be observed if Isaiah **THOMAS** and three unknown individuals are the contributors than if four unknown individuals are the contributors."

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THOMAS does not respond back as a convicted felon and is not currently in-custody.

Printed Name Detective K. Mutschler #5702

Signature

Det. K. Mutschler #5702

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

Judge

Circuit Court of _____ County, State of Missouri.