


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

<b>POLICE NO. :</b>	KC22030713
<b>PROSECUTOR NO. :</b>	095469648
<b>OCN:</b>	HU007619

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>PAUL WRIGHT</b>	)	
<b>5003 Bellefontaine Ave.</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64130</b>	)	<b>DIVISION</b>
<b>DOB: 10/24/1961</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	<b>DEFENDANT.</b>	)

**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 May 10, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Terylle Gorham caused the death of Terylle Gorham 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.

**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 May 10, 2022, 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 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. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about May 10, 2022, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Smith & Wesson M & P .45 , serial #NCR6399, a firearm, and in 1995 the defendant was convicted of the felony of armed bank robbery in the Western District of Missouri case 4:99-CR-00209-GAF-1.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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.

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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/ Jennifer S Tatum*  
Jennifer S Tatum (#70789)  
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**WITNESSES:**

1. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
2. [REDACTED]
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
9. PO Alannah P. Swaggart, 1125 Locust St., Kansas City, MO 64106
10. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
11. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106
12. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 05-12-2022

CRN: KC22030713

I, Detective Scott Mullen #5431  
(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 05-10-2022, at 3022 E. 49<sup>th</sup> St in  
(Date) (Address)

Kansas City, Jackson Missouri Paul Wright  
(County) (Name of Offender(s))

B/M 10-24-1961, [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

Murder  
ACA  
FIP

The facts supporting this belief are as follows:

On 05/10/2022 at approximately 0909 hours, officers of the Kansas City, Missouri Police Department were dispatched to an apartment complex located in the area of 49th Street and Bellefontaine, Kansas City, Jackson County, Missouri, in regard to a shooting. Upon arrival the officers discovered a black male (victim) in a parking lot just east of 3022 E. 49th Street, lying underneath a truck. The victim was suffering from multiple gunshot wounds and several spent .45 caliber shell casings were located in close proximity to the victim's body.

EMS Personnel responded and determined the victim to be deceased. The case was ruled a homicide.

During the course of the investigation, detectives spoke with several residents of the complex. One resident advised the "word on the street" was that Paul was the suspect of the murder and his mother lives at the second house south of 50th Street on the east side of the road. Detectives determined the address to be 5003 Bellefontaine. PIC Personnel (KCPD) subsequently developed an individual named, Paul Wright, B/M, 10/24/1961, address 5003 Bellefontaine Avenue as a potential suspect. A DOR photograph of Paul Wright was viewed by the resident and she identified him as the individual she knows as Paul, the potential suspect.

A witness reported seeing Wright with a handgun in his waistband and walking in the apartment complex with the victim just prior to the shooting.

Another witness who stated he knew Wright from spending time in federal prison with him and running the streets with him when they were younger, reported seeing Wright in the complex just prior to the shooting and then after the shooting when Wright asked him for a ride away from the area. The witness stated he told Wright he could not give him a ride and he last saw Wright walking southbound on Walrond Ave (direction which would be consistent toward 5003 Bellefontaine). The witness stated he hangs out at the apartment complex often

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and this was the first time he had seen Wright there. The witness knew Wright's family lived not far from the apartment complex south on Bellefontaine Ave.

The victim's girlfriend was contacted who stated the victim stayed the night on 05-09-2022 into 05-10-2022 and she last saw him when he woke up to go get some air the morning of 05-10-2022 prior to the homicide. The girlfriend's mother also confirmed the victim had been recently staying at her apartment with her daughter. The apartment where the victim's girlfriend and her mother live is inside the apartment complex where the victim was murdered. A neighbor who lives in the same building as the girlfriend confirmed the victim had been staying at the apartment with his girlfriend for at least two weeks.

Detectives recovered surveillance video from a resident in the apartment complex. The resident also responded to Police Headquarters to provide a statement. During the statement, the resident and detectives reviewed the video and the resident identified the victim and Wright (black pants, black jacket, gray/black pattern shirt under jacket, black shoes, bald head) on the video as they walked together west behind the buildings toward the area of the homicide. At 9:06:11 DVR time the victim and Wright go around the corner to where the homicide happens and 15 seconds later at 9:06:26 Wright walks back around the corner holding what appears to be a gun in his right hand before tucking it back into his black coat on his left side. The resident stated she was watching the video live when the victim and Wright went out of view from a monitor in her apartment. The resident stated after they went out of view she heard the gunshots which made her jump up and she did not watch the monitors as Wright came back into view. The resident also stated the night prior (05-09-2022) to the shooting, she saw Wright outside at the apartments and he pointed a gun at someone named TY. The resident stated Wright had been coming around the past few days trying to get things the victim bought from him because the items Wright sold the victim were stolen and the person wanted their things back. The resident stated the victim didn't want to give the things back because he paid for them. The resident showed the detectives text messages she sent her fiancé in regard to her seeing Wright outside the building on 05-10-2022 at approximately 0300 hours. One of the messages stated, "Paul said he was looking for that Nigga with the Dreads, and he was going to shoot up the building." Detectives asked the resident who the, "Nigga with the Dreads" was and she stated "Relly".

Detectives reviewed the responding officers COBAN video as they went to the original shooting call and at 0916 hours, a responding patrol vehicle traveling westbound on 51st St captures a black male with a bald head wearing black pants, and a patterned shirt similar to what Wright was observed wearing on the surveillance video walking from east to west across Bellefontaine Ave. The male appears to be holding something black in his right arm which could be consistent with the black jacket Wright was observed wearing on the surveillance video.

A person of interest was issued for Wright in regard to the homicide on 05-11-2022. On 05-11-2022 at 2310 hours officers were conducting patrol in the area of 49th/Agnes. The officers conducted a traffic stop on a blue pick-up truck at Emanuel Cleaver II Blvd and Benton Blvd after observing the pick-up truck commit multiple stop sign violations and the truck being improperly registered. The driver was identified who had a suspended driver's license and Wright was identified as the passenger of the vehicle. Prior to conducting an inventory of the vehicle before it was towed, the officers asked the driver and Wright if there was anything inside the vehicle that might hurt them to which the driver responded, "It's his" referring to Wright. While conducting the inventory the officers located a black .45 caliber handgun wrapped in a red bandana. The gun was left in place and the vehicle was towed to the City Tow Lot and placed inside the Vehicle Processing Facility.

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The driver of the Mazda was read his Miranda Rights and after being read his Miranda Rights, he stated he only knows Wright as "Paul" and did not even know his last name. He stated he has only known him for 3-4 weeks. The driver stated Wright showed up at his house on foot later on 05-11-2022 and asked for a ride. The driver gave Wright a ride to the area where they were eventually pulled over. Prior to getting pulled over the driver stated Wright exited the vehicle for a few minutes when they arrived at the destination Wright directed him to before getting back in the truck. The driver stated when they got pulled over he heard the glove box open and he observed Wright put something wrapped in a red bandana in the glove box and shut it. The driver stated he told Wright if the police find whatever he put in the glovebox he, (Wright) better own up to it, but Wright did not respond.

On 05-12-2022 a search warrant was executed on the Blue Mazda pick-up and a Smith & Wesson M&P .45 caliber hand gun serial #NCR6399 was found wrapped in a red bandana in the glove box. The gun was loaded with one live round in the chamber and one live round in the 10 round capacity magazine thus making the firearm readily capable of lethal force. The head stamps on both rounds was "Hornady .45 Auto" which matched the 5 of the 6 spent shell casings found at the crime scene. The Smith & Wesson firearm recovered from the glove box and one 45 Auto cartridge case recovered from near the victim's body were both entered into NIBIN. The NNCTC has returned a potential NIBIN lead between these two items. This lead has not yet been confirmed by microscopic comparison. However, this lead shows that the potential that the firearm in was used in this homicide is significant enough that investigative follow up is warranted. Further testing will be completed.

Wright was placed on a 24 hours investigative hold and booked in at the Metro Patrol Division (7601 Prospect Ave, Kansas City, Jackson County, Missouri). On 05-12-2022 Wright was read his Mirada Rights and after being read his Mirada Rights, Wright declined to provide a statement.

A criminal history search on Wright revealed he plead guilty to Armed Bank Robbery on 07-15-1997 and was sentenced to 26 years, 8 months incarceration, with 5 years probation, case number 4:99-CR-00209-GAF-1 (1995) West. Dist. Mo

Printed Name Detective Scott Mullen #5431 Signature /s/Det. Scott Mullen #5431

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.