

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

POLICE NO. :	KC22033290
PROSECUTOR NO. :	095469753
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ELLIOTT P. NEVELS)	
105 W 39th St #308)	CASE NO. 2216-CR
Kansas City, MO 64111)	DIVISION
DOB: 05/12/1988)	
Race/Sex: B/M)	
)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200901.0)

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 19, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Christina V. Nevels caused the death of Christina V. Nevels 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 571.015.1, RSMo, in that on or about May 19, 2022, in the County of Jackson, State of

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Missouri, the defendant committed the felony of Murder in the Second Degree, 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 firearm.

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. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20203802.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about May 19, 2022, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of Confidential Victim, a child less than seventeen years old, by discharging a firearm within the vehicle in which Confidential Victim was riding.

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/ Lauren D. Barrett
Lauren D. Barrett (#62062)
Assistant Prosecuting Attorney
415 East 12th Street
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lbarrett@jacksongov.org

WITNESSES:

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

PROBABLE CAUSE STATEMENT FORM

Date: 05/20/2022

CRN: KC22033290

I, Bradley Thomas #3971
(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 05/19/2022, at 1224 Linwood Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Elliott P. Nevels, B/M, 05/12/1988
(County) (Name of Offender(s))

[REDACTED]
(Description of Identity)

The facts supporting this belief are as follows:

- Murder
- Armed Criminal Action
- FIP
- Endangering the Welfare of a Child

On 05-19-2022 at 2244 hours, Officers from the Kansas City Missouri Police Department were in the back parking lot of the Central Patrol Division (1200 E. Linwood Blvd) when they heard 3 muffled gunshots and then what sounded like a car accident coming from the south. The Officers then observed vehicles on Linwood stopping or leaving the area and then observed an unknown black male wearing all black sprinting northbound on Tracy Ave looking back to the south as he ran. Officers radioed to other officers about the suspect running northbound on Tracy. The Officers ran up toward Linwood Blvd and observed a White 2010 Dodge Avenger 4 door, MO Temp Tag 063QG5, VIN: 1B3CC4FB4AN182957 crashed in the parking lot of 1224 E. Linwood Blvd, Kansas City, Jackson County, Missouri and the passenger door on the vehicle standing open. An unknown black female driver was deceased in the driver's seat of the vehicle and a 4 year old female passenger was in the back of the vehicle screaming. The victim was identified as Christina Nevels, B/F, 07/18/1985. An autopsy was conducted on 05/20/22. The ME stated the victim was shot multiple times and her death has been ruled a homicide.

The Temp Tag on the vehicle responded back to Christina Nevels. The victim had blood coming from the right side of her head/neck and blood spatter was observed inside the vehicle consistent with a close proximity gunshot injury. No exterior bullet damage was observed to the vehicle. There were no shell casings recovered from inside the vehicle, but two spent bullets were recovered. A firearm was not located in the vehicle.

After the Officers put out the shooting and the description of the unknown black male they saw sprinting northbound on Tracy Ave, other Officers and Deputies from the Jackson County Sheriff's Office responded to the area. Officers heading northbound on Tracy passed a black male wearing all black at the corner of

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29th/Tracy. Jackson County Deputies also responding to the area picked up the same male as he had turned to run back south on Tracy Ave and took him into custody. The male identified himself as Elliott P. Nevels B/M 05-12-1988. Nevels had apparent blood spatter on his clothing and body. Nevels was arrested and placed on an investigative hold.

On 5/20/22 at approximately 1125 hours, ATF Agent and his Firearm canine were searching for the firearm used in the homicide. ATF contacted the homicide unit and stated they had found a revolver in the field at 30th and Tracy, Kansas City, Jackson County, Missouri. Detectives responded to 30th and Tracy and recovered a RG31 revolver with 4 spent casings in the cylinder and one empty cylinder. A live PMC38SPL round was laying the grass about 20 feet west of the revolver.

Video surveillance cameras in the area on Linwood between Troost and Paseo captured the white Dodge Avenger on Linwood. As it comes into camera view, it is observed traveling eastbound, but turning as if to pull into Center Patrol parking lot. The vehicle is traveling a slow rate of speed and strikes the curb just east of the upper parking lot of Center Patrol. The vehicle then rolls into the parking lot of 1224 Linwood, striking another vehicle and comes to rest. Video surveillance from 1224 Linwood captures the vehicle traveling east on Linwood at a slow rate of speed, and leave the roadway towards the west of the building. The vehicle then leaves the view of this camera. The suspect, Nevels is then seen on foot running east from the area of the parking lot and along the south side of the building. The suspect then leaves camera view. The suspect is observed to be wearing a black t-shirt with a design on the front and black pants. It should be noted when Nevels is arrested at 29th and Tracy, he is observed to be wearing a black t-shirt with a design on the front and black pants similar in what is seen on the camera footage.

On 5/20/22, a witness [REDACTED] provided a statement. She stated on 5/19/22, she was with Nevels, the victim and the 4 year old from 10am to 3pm. During this time, [REDACTED] witnessed a verbal altercation between the victim and Nevels over his intoxication and behavior. The victim told Nevels she was going to drive him to the police station and let his probation officer know that he was violating the terms of his probation by drinking alcohol. [REDACTED] heard Nevels state "before I let you send me back to prison, I will kill you and kill myself." Nevels also stated, "If I can't have you no other man will. I'm gonna kill you and then kill myself." During the time [REDACTED] was in the vehicle with Nevels and the victim, she witnessed Nevels waving around a silver revolver handgun and she advised he has pointed a weapon at the victim in the past. She also stated the victim has been having issues with Nevels because he has been using ecstasy and alcohol and not taking his medication.

On 5/20/22, a forensic interview was completed on the juvenile who stated she was in a car with her uncle and he shot her aunt. She said there was a lot of smoke in the car and it was really loud. She stated the officers rescued her from the car.

On 5/20/22 at approximately 1140 hours, Nevels was transported to 1125 Locust, Police Headquarters, 7th floor for questioning. After his Miranda Rights were given, Nevels stated he was in the vehicle with the victim and his 4 year old niece. He stated the victim originally had a gun and was mad at him because he was talking to other females. Nevels stated he took the gun from the victim and she took his phone to see who he was talking to while she was driving. Nevels claimed the victim began driving at a high rate of speed, he was scared for his niece's safety, so he shot the victim. He then ran from the scene.

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Nevels was found guilty in 2021 and confined to 7 years for Domestic Assault – 2nd degree and a 3 year confinement for ACA. In 2021, he received a guilty sentence for Assault – 2nd Degree with 5 years confinement/suspended and given 4 years’ Probation. Nevels is currently on Probation for Domestic Assault in the 3rd degree and Assault in the 2nd degree.

Printed Name Bradley Thomas #3971 Signature /s/ Det. Bradley Thomas #3971

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

Judge

Circuit Court of _____ County, State of Missouri.