

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

POLICE NO. :	KC22070514
PROSECUTOR NO. :	095472222
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
GLENN A. PULLUAIM II)	
3112 Harrison St)	CASE NO. 2216-CR
Kansas City, MO 64109)	DIVISION
DOB: 07/15/1994)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y20200903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about October 17, 2022, in the County of Jackson, State of Missouri, the defendant, after deliberation, knowingly caused the death of Chantell M Gipson by shooting her, and that the defendant was eighteen years of age or older at the time of the offense.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

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 (571.015-001Y20205299.0)

State vs. Glenn A. Pulluaim II

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 on or about October 17, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of murder 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 murder in the first 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 1st Degree (565.020-001Y20200903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about October 17, 2022, in the County of Jackson, State of Missouri, the defendant, after deliberation, knowingly caused the death of Austin Scott by shooting him, and that the defendant was eighteen years of age or older at the time of the offense.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the

State vs. Glenn A. Pulluaim II

commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

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 IV. 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 on or about October 17, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of murder 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 murder in the first 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. Glenn A. Pulluaim II

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, #54970
Assistant Prosecuting Attorney
415 E. 12th Kansas City, MO 64106
jwolpink@jacksongov.org

WITNESSES:

1. DET Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106
2. [REDACTED]
3. [REDACTED]
4. PO Richard D. DuChaine, 1125 Locust, Kansas City, MO 64106
5. CST LaSandra Frowner, 2645 Brooklyn Ave, Kansas City, MO 64131
6. Chantell M Gipson, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. [REDACTED]
8. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
9. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
10. PO Jacob I. Ramsey, 1125 Locust, Kansas City, MO 64106
11. [REDACTED]
12. AUSTIN SCOTT, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
13. CST Marisa Smith, 1125 Locust, Kansas City, MO 64106
14. PO Valerie K. Tirado, 1125 Locust, Kansas City, MO 64106
15. CST Greg VanRyn, 6633 Troost, Kansas City, MO 64131

PROBABLE CAUSE STATEMENT FORM

Date: 11-16-2022

CRN: KC22-070514

I, Detective Mary Kincheloe #5063
(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 10-15-2022, at 8748 Chestnut Circle in
(Date) (Address)

Kansas City, Jackson Missouri Pulluaim, Glenn A. Jr. 07-15-1984
(County) (Name of Offender(s))

B/M, blk hair, brown eyes, 6'02", 166lbs, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Murder I x 2
ACA x 2

The facts supporting this belief are as follows:

On 10-17-2022, at 1258 hours, Officers of the Kansas City Missouri Police Department were dispatched to 8748 Chestnut Circle Apt #1, Kansas City, Jackson County, Missouri on a reported check the welfare call. Upon arrival, Officers observed the apartment to be secure, however several delivery boxes were outside the front door. Officers contacted the property managers, [REDACTED], and advised them of the nature of the call and based on the totality of the circumstances, the management company gained access to the apartment in the presence of Officers.

Upon entry, the deceased female victim, later identified as Chantell Gipson B/F 07-23-1987, was observed in the northwest bedroom, laying in the bed, with an apparent defect to the left temple region. In the northeast bedroom, laying in the bed, the deceased male, later identified as Austin Scott B/M 02-15-1996 and the cousin of Gipson, was observed to have an apparent defect to the back of his head. Neither party exhibited signs of life.

Further investigation by Officers on the scene revealed the following: On 10-15-2022, at approximately 1025 hours, Officers were dispatched to a building close by on a reported disturbance. The reporting party said she has had an ongoing domestic dispute with an ex-boyfriend and advised she heard (3) gunshots directly to the west of her apartment from the parking lot before a bullet entered her son's bedroom window. An aggravated assault report (CRN: KC22-070002) was taken and a bullet fragment was recovered from inside the apartment.

At the crime scene of the homicide, Detectives interviewed [REDACTED] who advised the following: On 10-15-2022, at approximately 1000 hours, [REDACTED] advised she heard one gunshot in which she thought came from the back of the building. She looked out her back window and did not see anything. She then heard three consecutive gunshots toward the front of the building. When she looked out the front window, she saw a black male with long dreads casually walking toward Gipson's vehicle. The male got into the vehicle, drove away and the vehicle had not returned. [REDACTED] said she recognized the male to be the same person she had seen one other time occupying the passenger seat of Gipson's vehicle while Gipson was observed occupying the driver seat. [REDACTED] said over the

PROBABLE CAUSE STATEMENT FORM

CRN KC22-070514

weekend, Amazon packages began piling up outside Gipson and Scott's front door. On Monday morning, when the packages remained in their same position and Gipson's vehicle had not returned, [REDACTED] notified management and Police.

Detectives interviewed a resident who described, who she believed to be Gipson's boyfriend, as a black male with shoulder length dreads who was also known to drive the Gipson's vehicle. The resident knew the male and female who occupied the residence were cousins and moved in together in the spring of 2022. Another resident advised a male and female occupied the residence of Apt. 1. The resident advised in addition to the known residents, a tall, skinny, black male with dreads also frequented the residence and drives a black Chevy Tahoe. The resident had not seen the described male with dreads since September.

A search warrant was obtained and executed on 8748 Chestnut Circle Apt. 1 and processed the residence for items of evidentiary value. The front door was secured prior to the property manager allowing Officers to make entry. The rear sliding glass door was unlocked and the security bar was not in place which allowed the door to freely open and close.

The northwest bedroom revealed Gipson to be occupying the full size bed and was partially covered by the comforter. I observed an apparent defect on the left side of her head. Underneath the right side of her head, a bullet fragment was observed. At the foot of the bed, a .380 caliber spent shell casing was recovered. There were no indications of a struggle inside the bedroom where Gipson was located.

The southwest bedroom revealed Scott to be laying on his stomach with a blanket covering the lower portion of his body. I observed apparent blood on the back of his head. I observed three, .380 caliber spent shell casings in and around this bedroom. A bullet fragment was recovered from within the blanket Scott was covered. Along the east wall of this bedroom, apparent damage was observed in a blanket that appeared to serve as a curtain over the window. Upon removing the blanket, damage was observed to the blind and behind the blind, an apparent circular defect consistent with damage caused from a bullet was observed. This window is on the bottom floor and directly across the parking lot from the building of the victim who reported a bullet through her window on 10-15-2022. There were no indications of a struggle inside the bedroom where Scott was located.

The Jackson County Medical Examiner's Office conducted a body examination which revealed Gipson to have one defect to her left temple with stippling abrasions present. The body examination of Scott revealed two defects; one defect behind his right posterior parietal scalp, stippling abrasions and soot present. One defect was observed to the right cheek and appeared to exit through his upper lip. One projectile was shown on X-ray to be present in Scott's skull and was recovered.

Several family members and friends arrived on scene and indicated Gipson's boyfriend's name is Glenn Pulluaim. Pulluaim was described as a black male, tall, skinny, with long dreads.

[REDACTED] Gipson, was interviewed and advised she was with Gipson on Wednesday, October 12, at Gipson's apartment where Pulluaim was present [REDACTED] said Gipson and Pulluaim have been dating since July 2021. She said Gipson described Pulluaim as someone diagnosed with schizophrenia. A DOR photograph of Glenn A. Pulluaim B/M 07-15-1994, 6'00"-6'02". 160 lbs, was shown [REDACTED] advised the person in the photograph is the same

PROBABLE CAUSE STATEMENT FORM

CRN KC22-070514

person she knows to be Gipson’s boyfriend. However, [REDACTED] advised Pulluaim’s dreads are much longer than what is depicted in the photograph.

A computer check of Pulluaim revealed him to be on supervision with Probation and Parole. Pulluaim was charged with Murder I x 2 as well as ACA x 2 in 2013. Pulluaim pled guilty to Voluntary Manslaughter and completed a seven year sentence in 2020.

Detectives searched the ALPR system and located Gipson’s vehicle, a 2018 black Chevrolet Tahoe bearing a MO license plate of EG3F0R northbound at 79th and Holmes on 10-15-2022 at 1024 hours which is approximately the same time the previous 911 call was received regarding the assault report that was taken by Officers on 10-15-2022. Gipson's vehicle is captured several times on Genetec camera throughout the city on 10-15-2022. The vehicle is last captured at 31st and Gillham at 1402:31 hours on Genetec cameras. Gipson's vehicle was left abandoned in front of 3137 McGee where it was captured on camera at 1405 hours.

One of the two known and documented addresses of Pulluaim since his release from prison was 1 block to the west of where Gipson’s vehicle was found. The other address was 7 blocks directly to the east of Gipson’s vehicle.

Gipson’s cell phone was recovered and submitted to the HARCFL for extraction and analysis of the data contained in the cell phone which revealed the following: the victim last spoke with Pulluaim on 10-14-2022 at approximately 1830 hours. There had been consistent communication between the two, however, after 10-14-2022, there have been no texts or calls from Pulluaim.

On 11-16-2022, I received a report from the Kansas City Police Crime Laboratory indicating the following: The known DNA profile of Pulluaim was compared to the swabs collected from the recovered spent shell casings. The spent shell casing collected at the foot of the bed where Gipson was located revealed Pulluaim was included as the major contributor to the DNA on the casing and had a statistical data of 18 septillion. The swab of the spent shell casings recovered from the bedroom where Scott was located revealed Pulluaim was included as a contributor with the statistical data being 17 million.

The whereabouts of Pulluaim are unknown at this time as he is not at any of the addresses he had provided as a condition of his parole. Pulluaim currently has a warrant for his arrest for violating the conditions of his parole.

Printed Name Det. Mary Kincheloe #5063 Signature /s/ Det. Mary Kincheloe #5063

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

PROBABLE CAUSE STATEMENT FORM

CRN KC22-070514

Judge

Circuit Court of _____ County, State of Missouri.