

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

POLICE NO. :	KC21064631
PROSECUTOR NO. :	095472615
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DARELL E THOMPSON)	
5204 Hardy Ct.)	CASE NO. 2216-CR
Kansas City, MO 64133)	DIVISION
DOB: 07/01/2004)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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

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 on or about September 24, 2021, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another or others, knowingly or with the purpose of causing serious physical injury to G.W. caused the death of G.W. by shooting him, and the defendants are further given notice that should the state submit murder in the second degree under Section 565.021.1(2), it will be based on the death of G.W. as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030.9, committed by defendants.

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.

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Count II. Accessory Armed Criminal Action (571.015-001Y20205213.2)

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 September 24, 2021, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully 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 defendants 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. Accessory Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.2)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the **class B Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about September 24, 2021, at 9527 James A. Reed, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another or others, knowingly shot a firearm from a white Chevrolet Malibu, a motor vehicle.

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The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. Accessory Armed Criminal Action (571.015-001Y20205213.2)

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 September 24, 2021, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendants committed the foregoing felony of unlawful use of a weapon 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.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER
Prosecuting Attorney

State vs. Darell E Thompson

Jackson County, Missouri
by,

/s/ Paul M. Conklin III
Paul M. Conklin III (#66958)
Assistant Prosecuting Attorney
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WITNESSES:

1. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
2. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
3. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
4. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
5. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
6. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

7. [REDACTED]

64106

PROBABLE CAUSE STATEMENT FORM

Date: 05-24-2022

CRN: KC21064631

I, Det. 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 09-24-2021, at 9527 James A. Reed in
(Date) (Address)

Kansas City, Jackson Missouri Darell E. Thompson
(County) (Name of Offender(s))

B/M 07-01-2004, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Murder
ACA

The facts supporting this belief are as follows:

On 09-24-2021 at 2239 hours, Officers from the Kansas City Missouri Police Department were dispatched to the area Bannister Rd and James A. Reed, Kansas City, Jackson County, Missouri in regard to a sound of shots call. Upon arrival, a juvenile black male victim was located in the driveway to 9527 James A. Reed deceased from apparent gunshot injuries. A stolen .40 caliber Glock handgun was located on the ground next to the victim and two spent .40 caliber shell casings were near the victim/gun.

A witness, [REDACTED], was later interviewed and stated he was at the Raytown South vs Grandview football game. When he left, he got a phone call from the victim who had also been at the game. The victim sounded scared and asked him for a ride. [REDACTED] picked the victim up at a gas station off of 350 Highway. While they were driving, he heard the victim was arguing with someone on the phone and giving out their location. [REDACTED] was concerned by this and made the victim get out of the car on James A Reed. Shortly after the victim exited the car, he heard shots in the area.

Surveillance video was obtained in the area which showed the victim was dropped off by a white Pontiac at the convenient store located at 8105 Bannister Rd, Kansas City, Missouri. Around the same time as the victim is being dropped off a suspect vehicle later identified as a white Chevrolet Malibu with a missing front bumper is seen traveling southbound on James A Reed approaching Bannister Rd. The white Chevrolet Malibu pulls into the parking lot at LP's Automotive located at 8200 Bannister Rd. It should be noted the LP's automotive was a closed business. The white Chevrolet Malibu appears to be sitting in a position where the occupants can watch across the street at 8201 Bannister Rd. The victim can be seen pacing around and then walking into the parking lot of 8201 Bannister Rd. The victim is looking towards the white Chevrolet Malibu and raising his hands in the air seemingly taunting someone. The victim walks back southbound through the parking lot. The white Chevrolet Malibu can then be seen pulling out of LP's Automotive and driving past the victim. Gunshots can be heard on the surveillance video as the white Chevrolet Malibu drives past the victim on 09/24/2021 at

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approximately 22:29:10 hours. .40 caliber, 9mm, and 223 shell casings were recovered in the area where the Chevrolet Malibu traveled.

A further review of the surveillance video shows the white Chevrolet Malibu had driven through the parking lot of 8201 Bannister Rd prior to the victim arriving at the location. The white Chevrolet Malibu can be seen with the passenger visor in the down position as it drives through the parking lot at 8201 Bannister Rd. The driver side headlight of the white Chevrolet Malibu is not working. The front bumper is missing from the white Chevrolet Malibu.

The white Chevrolet Malibu is seen on surveillance cameras backing into a driveway at 8002 E 93rd Ter, Kansas City, Missouri on 09/24/2021 at approximately 2233 hours (minutes after the murder). A person can be seen exiting the rear passenger seat of the Chevrolet Malibu. The person runs into the garage door of the residence. The person appears to be inside 8003 E 93rd Ter, Kansas City, Missouri for approximately one minute then comes back outside and gets into the vehicle. The vehicle is then seen leaving westbound on 93rd Terrace.

A search warrant was obtained for 8003 E 93rd Terrace and executed on 09/27/21. When Tactical Officers were clearing the residence a black male later identified as being [REDACTED] (B/M, 12/29/2000) was seen coming down the hallway. As Tactical Officers took [REDACTED] into custody he dropped a black iPhone in a gray case on the floor which was recovered as evidence. During the search of the residence, a Glock model 22 .40 caliber handgun serial #GXU540 was recovered from under the mattress in the south east bedroom. The firearm was test fired at Kansas City Police Crime Lab. The .40 caliber shell casings recovered from the street on James A. Reed at the crime scene were found to have been fired from the Glock recovered Adams-Bradley's house (8003 E. 93rd Ter).

After being read his Miranda Rights, [REDACTED] denied any involvement in the homicide and any connection to the Glock firearm found inside his residence. [REDACTED] stated he was at his residence on 09-24-2021 at around 2030 hours and did not leave the rest of the night. He stated his cousin "Rell" came over between 2100 & 2200 hours. [REDACTED] provided 816-616-7118 as his cell phone number.

On 09/28/2021 the white Chevrolet Malibu was recovered at 48th/Overton in Kansas City, Jackson County, Missouri after a citizen reported an abandoned auto at that location. There were spent 9mm shell casings on the exterior of the vehicle where the windshield wipers rest. The head stamps on the 9mm shell casings were the same as the 9mm shell casing located at the crime scene on James A. Reed.

A search warrant was obtained for the Chevrolet Malibu and during the execution of the warrant, paycheck stubs of [REDACTED] and a work ID with the name [REDACTED] from Red X in Riverside, Mo were located inside the vehicle. The bill of sale for the vehicle was located inside the vehicle which showed the vehicle was sold to [REDACTED] [REDACTED] College Ave. A computer check revealed [REDACTED], B/M, 08/08/2003 had the same address of 6 [REDACTED] College Ave. Detectives responded to the Red X in Riverside, MO in an attempt to locate [REDACTED] where they learned he no longer worked. Red X confirmed [REDACTED]' DOB and also provided his phone number as 816-[REDACTED]

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██████████ was arrested on 10/26/2021 at 10529 E 45th Place and placed on an investigative hold. Prior to be taken into custody, ██████████ was observed entering the front passenger seat of a silver Pontiac Grand Prix outside of his residence. As detectives approached the vehicle, ██████████ was observed reaching under the front passenger seat. After ██████████ was taken into custody a Taurus 9mm handgun was located under the front passenger seat. 10529 E. 45th Place is less than a mile away from where the Chevrolet Malibu was found abandoned.

██████████ denied involvement in the homicide. He claimed the Chevrolet Malibu was stolen from his driveway at 10529 E 45th Place approximately 3-4 days prior to the murder of the victim. ██████████ stated he left the car running and the keys in it when it was stolen. ██████████ stated on the day of the homicide, he was at home, then went to his brother's football game at Lincoln College Prep (2111 Woodland) and was there until the middle of the 4th Quarter and then went home at approximately 2230 hours and was there the rest of the night. ██████████ stated he went to the game with his mother in her vehicle and stated he was never near Bannister and James A Reed at the time of the homicide. ██████████ denied knowing ██████████, but when shown a picture of him, he stated he knew him as ██████████ and also called him ██████████ ██████████" is a known nickname for ██████████. When confronted that ██████████ phone showed phone contact to his phone on the day of the homicide to include text messages which appear to show that ██████████ is supposed to pick up ██████████ ██████████ denied he had access to a car and stated he was at his brother's football game. ██████████ signed a Consent to Search for the download of his cell phone.

Two TIP Hotlines were received in this case and provided a suspect by the name of "**Darrell**" B/M 16-17 years old (possible last name of Thompson)" being responsible for the homicide. A police database search links ██████████ and **Darell Thompson, B/M, 07/01/2004** as associates. The contact list in ██████████ phone listed a phone number for "**Rell**" being 816-596-7991. A text conversation on 9/24/2021 between ██████████ and a phone number identified as ██████████ was observed. At 1:28 PM, ██████████ texts "Picc rell up first."

Court Orders were obtained for the cell phone records for ██████████, and **Thompson**. A review of the records showed the following: On 09-24-2021 at 1450 hours all three phones show to be in the area of ██████████ house on ██████████. Video surveillance shows the white Malibu at ██████████ house between 1445 hours and 1958 hours on 09-24-2021. All three phones show to remain together in the area of ██████████'s house as of 1932 hours. On 09-24-2021 all three phones show to be in the area of Raytown South High School between 2113 hours and 2130 hours. On 09-24-2021 at around 2222 hours all three phones show to be in the area of the homicide together which is consistent with video surveillance in the area capturing the white Malibu circling the area prior to the homicide. On 09-24-2021 at 2249 hours, all three phones show to be in the area of 10529 E. 45th Place ██████████).

During a further review of ██████████ records, the phone number listed as "**Rell's**", ██████████ is a frequently called number. The date of the homicide was searched and showed the last contact between ██████████ number and 816-596-7991 (**Thompson's phone**) occurred on 09/24/2021 at 2:22 PM Central Time. The next conversation recorded between the two numbers occurred on 09/25/2021 at 3:01 PM Central Time. The victim's cell phone records were analyzed and showed an incoming call from 816-594-7991 (**Thompson's phone**) to the victim's phone on 09/24/2021 at 10:23:56 PM Central Time and then an outgoing call on

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09/24/2021 at 10:24:44 PM Central Time from the victim to 816-596-7991 (**Thompson's phone**). **Thompson's** phone records showed recorded transactions to match these phone calls and also showed his phone in the area of the homicide when these calls were made/received. The surveillance camera audio captured the shooting occurring at approximately 10:29:10 PM.

Printed Name Det. 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.