

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>POLICE NO. :</b>	22-086194
<b>PROSECUTOR NO. :</b>	095472555
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>VYSHON D WILSON</b>	)	
<b>5821 Michigan Avenue</b>	)	<b>CASE NO. 2316-CR</b>
<b>Independence, MO 64055</b>	)	<b>DIVISION</b>
<b>DOB: 10/12/2004</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200999.0)**

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 on or about December 11, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Robert Butler caused the death of Robert Butler 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 (571.015-001Y20205299.0)**

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 December 11, 2022, in the County of Jackson, State of 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

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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.

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/ Jordan L. Logan  
Jordan L. Logan (#63975)  
Assistant Prosecuting Attorney  
415 East 12th Street  
11th Floor  
Kansas City, MO 64106  
(816) 881-3532  
JLLogan@jacksongov.org

**State vs. Vyshon D Wilson**

**WITNESSES:**

1. [REDACTED]
2. DET Steven Breshears, 223 N. Memorial Drive, Independence, MO 64050
3. PO Bryan Conley, 223 N. Memorial Drive, Independence, MO 64050
4. DET Scott Mckee, 223 N. Memorial Drive, Independence, MO 64050
5. [REDACTED]
6. [REDACTED] n Schmidli, 223 N. Memorial Drive, Independence, MO 64050
7. PO Daniel Thompson, 223 N. Memorial Dr., Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 12/13/2022

Report #: 2022-86194

I, Scott McKee, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 12/11/2022, at 0159 hours, VYSHON D. WILSON, (Race- Black, Sex- Male, DOB- 10/12/2004, Address- 5821 Michigan Avenue, Kansas City, MO 64130, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 12/11/2022 at about 0159 hours Independence Missouri Police Officers were dispatched to 4610 S. Brentwood, Apt. B, Independence, MO 64055, Jackson County regarding a shooting. Dispatch advised the caller's boyfriend had been shot and the suspect had fled the scene on foot to the north of the residence.

Independence Police Officers B. Conley, J. Bishop and D. Thompson arrived at the residence and immediately observed an unresponsive black male subject lying on his back in the entry way of the front door with multiple gunshot wounds. A black handgun was observed in a holster in the front waistband of the victim which was removed and rendered safe by Officer Bishop. The subject was later identified as victim Robert G. Butler Jr. and was pronounced deceased at the scene by AMR and IFD.

Officer Thompson stated they contacted a black female later identified as [REDACTED] the 911 caller. [REDACTED] said the victim [REDACTED] at the apartment. [REDACTED] stated the suspect for no reason shot the victim several times with a black AR style rifle/pistol. The suspect fled the apartment by going out the back door and jumping off the deck to the ground. [REDACTED] said the suspect fled on foot in a northwest direction. [REDACTED] identified the suspect as Vyshon Wilson, and he was a friend of her [REDACTED]. The suspect was identified by other subjects at the party and cell phone pictures that had been taken just prior to the incident. Information obtained from the Kansas City Missouri Police Department confirmed contacts with Vyshon Wilson, DOB 10/12/2004, with an address of 5821 Michigan Avenue, Kansas City, Missouri. Witnesses confirmed that the Defendant was living with his dad on Michigan Avenue.

I later obtained a formal interview with [REDACTED] in the Investigations Unit of HQ. She said they had a small party at her residence for her [REDACTED]. [REDACTED] said there was maybe only 10-12 family and friends at the party. She said the party was pretty laid back and advised there were no arguments or problems between anyone present. [REDACTED] said most everyone present were smoking marijuana, and some were in possession of guns. [REDACTED] said she had a pistol which she had placed on the kitchen counter earlier in the evening. She said the victim was in possession of a pistol which he kept in his front waistband.

[REDACTED] said by about 0130 or 0145 hours everyone had left the residence but the suspect/DEFENDANT. The DEFENDANT had told her that his father was coming to pick him up and should arrive anytime. When the DEFENDANT's father did not arrive, she told him that they (the victim and her) would take him home. The DEFENDANT insisted they wait for his father for about five more minutes. [REDACTED] said at that time the victim was standing near the front door and she was sitting on the couch and the DEFENDANT was standing behind her. She said she was about to get up when she heard gunshots. [REDACTED] said she turned around and observed the DEFENDANT shooting at the victim with a black AR style pistol. [REDACTED] said after the DEFENDANT shot the victim, he fled out the back sliding door, jumping off the deck and running in a northwest direction. [REDACTED] said neither the victim nor DEFENDANT said a word during the incident.

It should be known that about \$9000.00 in US currency was recovered along with about one (1) pound and (11) ounces of marijuana were recovered from the residence. [REDACTED] said the money and marijuana belonged to

the victim and her. Several spent .556 shell casings were recovered from inside the residence where the shooting occurred.

Witnesses from the party said the DEFENDANT had two phones while he was at the party. He had an iPhone in a white case and a black Android which he used for a hot spot. An iPhone in a white case was recovered from below the deck where the DEFENDANT jumped when he fled scene. Detectives later discovered that the phone number associated to this iPhone with white case dropped at the scene was 816-70 [REDACTED].

At the time this Probable Cause Statement a social security number could not be found for the DEFENDANT. The DEFENDANT has not yet been located.

Detective Scott McKee 1026

/s/ Detective Scott McKee 1026

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Print Name

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Signature