

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	23-000227
PROSECUTOR NO. :	095473186
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

TWANN J. MCGILL JR
8101 East 80th Street, #12
Kansas City, MO 64138
DOB: 03/07/1981
Race/Sex: B/M

**CASE NO. 2316-CR
DIVISION**

DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Assault - 2nd Degree - Special Victim (565.052-004Y20201309.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the class B felony of assault in the second degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about January 26, 2023, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED], a law enforcement officer, and special victim, by lunging toward and pushing into [REDACTED], causing him to fall down the stairs and break his ankle.

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 II. Resisting/Interfering With Arrest, Detention Or Stop (575.150-003Y20204801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the class A misdemeanor of resisting an arrest, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 26, 2023, in the County

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of Jackson, State of Missouri, Corporal Dallas Burnette and Sergeant Frank McDevitt, law enforcement officers, were making an arrest of defendant, and the defendant knew or reasonably should have known that the officers were making an arrest, and, for the purpose of preventing the officers from effecting the arrest, resisted the arrest of defendant by using or threatening the use of violence or physical force.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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/ Erica L. Frank

Erica L. Frank (#70660)
Assistant Prosecuting Attorney
321 West Lexington Ave
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WITNESSES:

1. [REDACTED]
2. PO Dustin Christina, 10000 E. 59th Street, Raytown, MO 64133
3. [REDACTED]
64106
4. DET Robert Fox, 10000 E. 59th St., Raytown, MO 64133
5. SERGEANT Frank McDevitt, 10000 E. 59th Street, Raytown, MO 64133
6. [REDACTED]
64106
7. PO Haley VanBibber, 10000 E. 59th St., Raytown, MO 64133

Probable Cause Statement Form

Date: 01-27-2023

Report: 23-0227

I, Det. Robert Fox, 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 01-26-2023, at 7717 Raytown Road Apt 20, Raytown, Jackson County, Missouri, Twann J. McGill Jr., B/M, 03-07-1981, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 01-26-2023 at approximately 2153 hours, Raytown Police Officers Dustin Christina and Haley VanBibber were dispatched to 7717 Raytown Road Apt. #20 in Raytown, Missouri in regard to a domestic disturbance. The reporting party – [REDACTED] (a [REDACTED]) - stated that a male and female were screaming, and the female was heard yelling "stop putting your hands on me".

Upon arrival, officers could hear yelling from within the apartment. PO Christina heard a male yell "I'm going to beat your ass again!" at which time he knocked on the door and announced their presence. The screaming went silent and a male - later identified as Twann J. McGill Jr., a black male born 03-07-1981, came to the door. Twann J. McGill Jr. cracked the door open with the slide lock still on, and told PO Christina to go away, slamming the door. PO Christina knocked again and informed Twann J. McGill Jr. that he needed to open the door. He opened it again and asked "what" and PO Christina informed him that he was there to investigate a disturbance, and Twann J. McGill Jr. responded by saying "there is no disturbance you can go" and slammed the door again. At this point, PO Christina had still not seen or heard from the female in the apartment. PO Christina informed Twann J. McGill Jr. that he needed to open the door or that PO Christina "would open it for him." Twann J. McGill Jr. opened the door with the slide lock still on again, prompting PO Christina to lift his leg to kick the door. Twann J. McGill Jr. quickly slammed it and reopened the door fully. PO Christina told Twann J. McGill Jr. to step out to talk to him, at which time Twann J. McGill Jr. said "no" and tried to shut the door again. At this time, PO Christina put his foot in the door and shouldered it open. PO Christina then took physical hold of Twann J. McGill Jr. and told him to step out. Twann J. McGill Jr. elbowed PO Christina in his side, then pulling away while pushing the door closed.

Raytown Sgt. Frank McDevitt and [REDACTED] arrived and they attempted to contact Twann J. McGill Jr.. Twann J. McGill Jr. opened the door and refused to provide any information. Then he gave the name of TJ McGill born on 12-07-1929 saying "yep, I'm that old" after repeated attempts to get his actual birthday he gave 12-07-1981. That information came back not on file through the police computer. When asked what the "TJ" stood for he said nothing "that's my God-given name." When asked what name was on his birth certificate he stated TJ. At this point, he was informed that if he did not provide his name and date of birth he would go to jail, and he again refused.

PO Christina, PO Vanbibber, [REDACTED], and Sgt. McDevitt entered the apartment and told Twann J. McGill Jr. to place his hands behind his back. He refused, resisting all efforts to place him in handcuffs he backed away, pulled his arms away, and repeatedly grabbed [REDACTED] hands and wrists as [REDACTED] told him to stop and place his hands behind his back. Twann McGill Jr. held [REDACTED] left wrist and was again ordered to let go, but he did not. Officers were eventually able to push Twann McGill Jr. to the floor on his stomach and pulled his hands behind his back.

After Twann McGill Jr. was handcuffed, Sgt. McDevitt and [REDACTED] began walking told Twann J. McGill Jr. outside the apartment to the stairwell leading down to the parking lot where the Police vehicles were located. Twann McGill Jr. stopped walking at the top edge of the staircase (8-10 total stairs) and was ordered to continue walking. Instead, as [REDACTED] held Twann McGill Jr. by his left arm, and Sergeant McDevitt held his right arm, Twann McGill Jr. quickly crouched and rotated his body to the right towards Sergeant McDevitt. Twann J. McGill Jr. then lunged and pushed his left shoulder forward into [REDACTED], who still had hold of told Twann J. McGill Jr.'s left arm, causing him to fall down the entire flight of stairs and land upon concrete below. During the fall, the side of [REDACTED] head struck a wall. As [REDACTED] landed, Twann McGill Jr. landed on top of him, followed by Sgt. McDevitt, resulting in Cpl. Burnette's leg to be bent and trapped beneath Twann J. McGill Jr.

[REDACTED] described hearing a "crack" sound upon landing, and feeling pain his lower left leg and ankle, caused as a result of Twann J. McGill Jr. pushing him with his shoulder, causing the fall. As [REDACTED] stood up and attempted to walk, he was unable to bear weight upon his left leg or move his left foot. Emergency medical personnel responded and determined [REDACTED] ankle appeared deformed, and he was subsequently transported me to Research Medical Center. X-rays revealed [REDACTED] left ankle to be broken.

At the scene, the female located in the apartment was contacted and she refused to cooperate or answer any questions regarding the domestic disturbance. She was later identified as Tylissa J. Ragland (b/f 01-02-2001) whose Missouri Department of Revenue (DOR) entry showed a previous address of 8101 E 80th Street #12, Kansas City, Missouri. This address is also shown on Twann J. McGill Jr.'s DOR entry. Tylissa Ragland's current license showed an address of 7717 Raytown Road #20, Raytown, Missouri – the location of the disturbance. Attempts to contact Tylissa Ragland at her apartment were unsuccessful.

On 01-27-2023 at approximately 0800 hours, Raytown Detective Fox contacted Twann J. McGill Jr., who was located inside of cell #2 at the Raytown Police Department detention area. Det. Fox asked Twann J. McGill Jr. if he would be willing to speak with me about the incident, however after multiple attempts no affirmative response was received, and Twann J. McGill Jr. stated he'd want to call his lawyer.

Name: Det. Robert Fox #1855

Signature: /s/ Det. Robert Fox #1855