

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

POLICE NO. :	KC23040603
PROSECUTOR NO. :	095474973
OCN:	HU013414

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
RYAN R. JACKSON)	
1216 Brush Creek Blvd., #C)	CASE NO. 2316-CR
Kansas City, MO 64130)	DIVISION
DOB: 08/23/1992)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

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 June 23, 2023, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Cyree C. Crook, caused the death of Cyree C. Crook 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

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571.015.1, RSMo, in that on or about on or about June 23, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, as charged in Count I,, all allegations of which are incorporated herein by reference, 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 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/ Caitlin Brock
Caitlin Brock (#67964)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3571

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cbrock@jacksongov.org

WITNESSES:

1. DET Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106
2. CST Allison Bennett, 1125 Locust, Kansas City, MO 64106
3. Cyree C. Crook, Jackson County Prosecuting Attorney's Office
4. PO Jayden M. McMahon, 1125 Locust, Kansas City, MO 64106
5. PO Ross Trimble, 1125 Locust, Kansas City, MO 64106
6. PO Briggs D. Webster, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/24/2023

CRN: KC23040603

I, Detective Nicole Anderson #5715, Kansas City Missouri Police Department
(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 06/23/2023, at 510 East 10th Street in
(Date) (Address)

Kansas City, Jackson County Missouri Jackson, Ryan
(County) (Name of Offender(s))

B/M, DOB: 08/23/1992 committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 06-24-2023 at approximately 2119 hours officers of the Kansas City Missouri Police Department were dispatched to 500 East 10th Street, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, they observed a male suffering from apparent gunshot trauma. The male was pronounced deceased on scene and Homicide 990 Squad responded to investigate.

Officers broadcasted a suspect description of a black male wearing a black tank top and white shorts. An officer attempted to conduct a pedestrian check on a male (later identified as Ryan Jackson) at the bus stop of 12th and Grand Avenue. Jackson was wearing a black tank top on his head and white shorts. The officer also observed the male to be wearing white shoes and tall white socks. Jackson ran as police attempted to stop him. Jackson ran south on Grand and then East through the parking lot, directly south of 12th and Grand. The officer observed Jackson reaching in his front waistband and carrying a small bag. Jackson ran across McGee before running north on McGee approaching 12th street. Jackson stopped and threw a small bag over the fence, on the west side of McGee street. Officers also advised that Jackson ran out of his shoes during the pursuit. Jackson was then taken into custody. Inside the bag officers located a tan in color Glock with serial ACHY638. Crime scene personnel conducted a presumptive test for human blood that appeared to be on the shoes and firearm. The test responded back as positive.

Detectives reviewed video surveillance from 500 East 10th Street where they observed a male wearing a black tank top, tall white socks, and white shoes. He was also wearing orange, blue, and white shorts. He appeared to have tattoos on his arms and blonde tips in his hair. The male and the victim were in the same parking lot when it appeared the male pulled out an object from his waistband and proceeds to wrestle with the victim. The victim fell to the ground and the male was on top of him. The victim appeared to be kicking as another male wearing blue shorts, a black shirt, and a grey backpack was kicking the victim. As the males were over the victim a flash can be seen. The male in the black tank top then extended his arm out as if he was firing a gun toward the victim and another apparent muzzle flash can be seen. Everyone in the parking lot then began to run as the victim was on the ground and appeared to be injured. The male appeared to leave the area to the west.

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Jackson was transported to police headquarters where he was read his Miranda Rights. Jackson advised he understood his rights and spoke with detectives. Jackson stated that he was never at a gas station and that he was under the influence of narcotics.

On or around 09/24/2015 Jackson was found guilty of a Class C felony of physically taking property through the Circuit Court of Jackson County CRN 1516CR0016701 where Jackson was sentenced to five years.

Printed Name Detective Nicole Anderson #5715 Signature /S/ Detective Nicole Anderson #5715

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

Judge

Circuit Court of _____ County, State of Missouri.