FILED 27-Feb-2024 19:43 CIRCUIT COURT OF JACKSON COUNTY, MO

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT KANSAS CITY 2416-CR00997

	POLICE NO.:	KC24012588
	PROSECUTOR NO.:	095478014
_	OCN:	
STATE OF M	IISSOURI,)
	PLAI	NTIFF,)
VS.)
	ION IDGON)
TYLER D TH	IOMPSON)
) CASE NO. 2416-CR
DOB:) DIVISION
Race/Sex: B/N	И)
S.S.N.:	71)
	DEFEN	DANT.)
	COMP	PLAINT

Count I. Murder 2nd Degree (565.021-001Y20200911.0)

WARRANT REQUESTED

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 February 26, 2024, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Confidential Victim, caused the death of Confidential Victim 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 February 26, 2024, 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 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/ Paul M. Conklin III
Paul M. Conklin III (#66958)
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State vs. Tyler D Thompson, Case No.

WITNESSES:

The State's witnesses as of 2/27/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

FILED 27-Feb-2024 19:40 CIRCUIT COURT OF JACKSON COUNTY, MO

after

Date: 02/27/2024 CRN: KC24012588 2416-CR00997 I, Detective Ilinca Rusnac #5741, of the 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 02/26/2024in (Date) (Address) Kansas City, Jackson Missouri Tyler D. Thompson (Name of Offender(s)) R:B S:M DOB: 12/08/2000 committed one or more criminal offense(s). (Description of Identity) The facts supporting this belief are as follows: On 02/26/2024 at approximately 1854 hours, Officers of the Kansas City Missouri Police Department were dispatched to , Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, Officers located the Victim, later identified as , laying in the grassy in the parking lot. was suffering from apparent gunshot wounds and was not breathing. was pronounced deceased at the scene by responding KCFD Medic 39 at 1910 hours. The Jackson County Medical Examiner's Office has ruled the death a homicide. As part of the crime scene investigation, a total of thirteen (13) 762x39 caliber spent casings bearing different manufacturers head stamps and two (2) 5.7x28 FNB casings were located in close proximity to parked vehicle and location of his body. One (1) Win 9mm Luger casing was located further away from the area of clustered physical evidence, along the north east walkway leading up to building number " Detectives interviewed Witness #1 who is younger brother and who stated the following: A mutual friend of his and the Victim's referred a male (later identified as Tyler D. **Thompson**) to Witness #1 for a potential marijuana transaction two days prior to the shooting by providing Witness #1 with the male's phone number of . Witness #1 called the provided phone number for the first time on 02/24/2024 at 1429 hours and spoke with Tyler D. Thompson for approximately six minutes. The phone call was followed by a text message from Witness #1 to the same phone number at 1444 hours and read "Send me some pictures" Tyler D. **Thompson** replied at 1500 hours by sending several images and short videos of what appears to be a gray Dodge Durango SRT. The conversation continues between the two, alternating between text message format and phone calls throughout the rest of the evening on 02/24/2024 and into 02/25/2024. The nature of the

conversation revolves around what appears to be the sale of said Dodge Durango by Tyler D. **Thompson** and purchase of the same by Witness #1. Of note during the course of this exchange is the fact that on 02/25/2024 at

0145 hours, Tyler D. **Thompson** provides Witness #1 with his residential address of

CRN	KC2	401	2588

having previously advised Witness #1 that he [Tyler D. Thompson] resides in	. A search of
Google Maps revealed	

According to Witness #1, he, the Victim and Tyler D. **Thompson** eventually met in the same apartment complex where the murder took place and drove together to the rear of a Popeye's restaurant on 02/25/2024 sometime around 1500 hours. Text messages corroborate this timeline. According to Witness #1, this is when the purchase of the Dodge Durango took place as well as a marijuana sale.

The conversation continued over text message (as well as phone and FaceTime) with Tyler D. **Thompson** sending a message to Witness #1 on 02/26/2024 at 0433 hours stating "LMK if u tryna make some pape" and attached ten (10) multimedia items (still photographs and short videos) to the message. The multimedia items depict a combination of closeup videos of marijuana buds, large amounts of cash, pills and a "Mazuma" Credit Union checking account balance inquiry receipt dated 02/01/2024 showing a check deposit in the amount of \$4,872.22 and a total balance of \$4,888.92. The photograph has an added on tag imposed under the Mazuma logo of "Come wit it" as well as white markup lines masking several lines. The bottom of the receipt includes a field that reads "Authorized by ID Source: "are depicted underneath that. Common knowledge of both routine banking transactions as well as commonly used abbreviations, lead me to believe the above to mean that the printout transaction was verified via Missouri Drivers License which ended in last four numbers of

The second image of importance is a self-taken photograph (selfie) depicting the torso and face of Tyler D. **Thompson** holding a stack of individually packaged marijuana bundles on his shoulder.

The text message communication continues with only incoming messages from Tyler D. **Thompson** as well as back and forth phone calls and FaceTime calls between the two.

On 02/26/2024 at 1832 hours, Tyler D. **Thompson** messages Witness #1 "Yall ready" followed by a combination of brief outgoing and incoming calls between the two parties between 1834 and 1847 hours. The last text message received from Tyler D. **Thompson** is at 1847:01 hours and reads "Wtw." This message's read receipt shows it to not have been read by Witness #1 until 1859:56 hours. The call log shows an outgoing call from Witness #1 to Tyler D. **Thompson** immediately following the 1847:01 message, at 1847:21 hours and lasting one minute and forty-two seconds. The last attempted communication shows a "Cancelled" outgoing call from Witness #1 to Tyler D. **Thompson** at 1858:13 hours, which is immediately followed by a phone call to 911.

During his statement, Witness #1 stated that while he was never formally introduced to the suspect or used each other's names during their interactions over the past couple of days, the male he's communicated with on the number is the same male as the one he met at Popeye's for the Dodge Durango sale and the same as the one who shot and killed his brother.

Witness #1 described the events that took place during the shooting of his brother as what he had arranged with Tyler D. **Thompson** to be a marijuana and possibly Percocet transaction, where Tyler D. **Thompson** was going to purchase both or either from the Victim. The Suspect arrived and got out of the driver seat of a

CRN	KC2	401	2588

red/maroon Chrysler 200 with a Missouri temporary tag affixed to the rear. Witness #1 stated this was the same vehicle Tyler D. **Thompson** drove to the apartment complex and then Popeye's the afternoon of 02/24/2024 also. Witness #1 described the Suspect as a very tall black male, between 6ft5 to 6ft7, dark complexion, no facial hair, dreads approximately down to his cheekbones, wearing a grey hoodie, blue jeans, white sandals and armed with a "Draco" or "AK" style rifle.

He described a second black male who got out of the front passenger seat and was armed with a handgun in his waistband. Witness #1 described the second Suspect as a shorter black male, 5ft6 to 5ft7, dark complexion, no facial hair, same style and length dreads as the driver, wearing a light blue jogging suit, white Nike Air Force shoes, and a silver chain with diamonds.

Witness #1 stated that Tyler D. **Thompson** had FaceTimed him just before arriving to the parking lot of the apartment complex in the described maroon Chrysler 200. Witness #1 began walking towards the parked suspect vehicle, which had backed in to a parking spot directly across the parking lot and directly in front of where he and the Victim had parked. As he was walking towards the suspect vehicle, the two suspects quickly exited the Chrysler 200 and began walking towards him. Witness #1 then began walking backwards towards the parked vehicle in which his brother was located. Witness #1 heard the two suspects and the victim negotiating the price for the transaction when he saw Tyler D. **Thompson** pull out a rifle from his hoodie, exclaimed "give me what you got" and proceeded to shooting. Witness #1 began running away in a north east direction and returned fire (twice – he believes) with his 9mm Glock pistol in the direction of the two suspects, as they were getting into the Chrysler.

During the investigation, a search of law enforcement database was conducted for the number. The results returned it as being registered to Tyler D. **Thompson.** A computer check of the Niche report writing system for Tyler D. **Thompson** revealed him to have been arrested in a stolen auto in 2023 and found to have been in possession of an iPhone and a debit card under the name of ______." A Missouri Department of Revenue search for Tyler D. **Thompson** returned his photograph and identifiers. He is listed as being 6ft5/6ft6 tall and appears to have a darker complexion bases on both his DOR photograph as well as prior arrest booking photos.

A computer search of Missouri Department of Revenue for included a Missouri Driver's License number ending in "which match the numbers listed on the Mazuma receipt. A Niche report writing system search for returned a result in which is listed as the reporting party in a 2024 reported theft from auto in which two Glock handguns were stolen out of her red 2015 Chrysler 200, bearing MO temporary tag of 071N00.

A search of the Automated License Plate Reader (ALPR) returned a result matching the temporary license affixed to the rear of a dark red Chrysler 200 as it is parked. The ALPR read was dated 12/20/2023 and was captured at . This is the same address as that provided by Tyler D. **Thompson** to Witness #1 as the residence he shares with his children.

On 02/27/2024, undercover Detectives with the Career Criminal Unit of the Kansas City Missouri Police Department drove past the address and confirmed aforementioned

CRN KC24012588

Chrysler 200 is parked at the location. They also stated that they observed apparent bullet damage to the passenger side of the vehicle.					
Printed Name <u>ILINCA R</u>	USNAC	_ Signature <u>/s/De</u>	t Rusnac #5741		
The Court finds probable ca	ause and directs the issuance	e of a warrant this_	27th day of	February, 2024	
SIGNED BY JUDGE This is a redacted public document. The original unredacted document bears the Judge's signature.					
Judge					
	Jackson		22.51		
Circuit C	ourt of	County, S ¹	tate of Missour	1.	