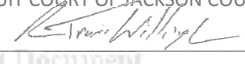


22-Oct-2024 12:22

CIRCUIT COURT OF JACKSON COUNTY, MO

BY  DCA

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

POLICE NO. : KC24074963

PROSECUTOR NO. : 095481333

OCN:

STATE OF MISSOURI,

PLAINTIFF,

vs.

D'AIRES J. GADSON

2016 E. 38th St.

Kansas City, MO 64129

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

CASE NO. 2416-CR

DIVISION

DEFENDANT.

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 October 3, 2024, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to [REDACTED] caused the death of [REDACTED] 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 (571.015-001Y20205213.0)

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 October 3, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count

State vs. D'Aires J. Gadson, Case No.

1, 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.

Count III. Unlawful Possession Of A Firearm (571.070-004Y20245212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class C felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about October 3, 2024, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Cobra .380 handgun, a firearm, [REDACTED]

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000); 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.

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/ Hallie L. Schuman

Hallie L. Schuman (#66333)

Assistant Prosecuting Attorney

415 E 12th Street, Floor 11

Kansas City, MO 64106

(816) 881-4488

HSchuman@jacksongov.org

WITNESSES:

The State's witnesses as of 10/22/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 10/22/2024

CRN: KC24074963 22 Oct 2024 12:22

CIRCUIT COURT OF JACKSON COUNTY, MO

BY [Signature] DCAI, Det. Grant Spiking #5484, 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 10/03/2024, at [Redacted] in
(Date) (Address)Kansas City, Jackson County Missouri Gadson,D'Aires
(County) (Name of Offender(s))[Redacted] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 10/03/2024 at approximately 1023 hours, officers with the Kansas City, Missouri Police Department were dispatched to [Redacted] in regard to a shooting. Upon arrival, they located the victim laying in the street suffering from apparent gunshot trauma in front of [Redacted] Kansas City, Jackson County, Missouri. KCFD-EMS responded and pronounced the victim deceased at the scene.

The victim's residence, [Redacted] had a Ring surveillance camera by the front door. Detectives were able to review the video footage and observed on 10/03/2024 at approximately 1020 hours, the suspect (wearing a light colored hoodie with the hood up, a dark jacket, and light colored pants) and the victim were in the victim's driveway. The suspect pulled out a handgun and started shooting at the victim. The victim ran to his maroon/tan Ford F-150, that was parked in the street, while the suspect continued to shoot at the victim. As the suspect was shooting at the victim, it appeared the suspect's gun malfunctioned, due to the suspect appearing to repeatedly rack the slide of the firearm. The victim limped to the other side of the pick-up truck while the suspect stated, "This ain't no game n****." The victim turned around, away from the suspect, and yells, "Call the police." As the victim was facing away from the suspect, the suspect shot at the victim and the victim fell to the ground. The suspect then walked towards the victim and the pick-up truck before the video ends. Witnesses stated after the shooting, the suspect went through the victim's pockets and drove away in the victim's maroon/tan Ford F-150.

Detectives and Crime Scene Technicians processed the scene and observed six (6) spent .40 caliber shell casings around the driveway of [Redacted] (the area the suspect was observed shooting on video surveillance). Four (4) live .40 caliber rounds were located near the same area (this is consistent with observing the suspect appearing to rack the slide of his handgun several times on surveillance camera). Two blazer .380 shell casings were located near the driveway entrance, near where the victim's maroon/tan pick-up was parked.

Investigation revealed the deceased victim was also the victim of a robbery at the same residence on 08/08/2024. The suspect in the robbery (identified as [Redacted]) went to the victim's residence and robbed him for selling

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him a vehicle that broke down and the victim refused to give him his money back. The victim stated he knew the suspect to live around the corner at [REDACTED] was later taken into custody and was incarcerated during the time of this homicide and is not considered a suspect.

On 08/30/2024, officers were again dispatched to the deceased victim's residence, [REDACTED] [REDACTED] [REDACTED] in regard to a party armed with a rifle. The victim stated an individual, who he believed was the brother of [REDACTED] knocked on his front door and was harassing him for money for the Cadillac he sold to his brother. The victim stated he observed a rifle sticking out of the individuals backpack.

Both incidents were captured on the victim's Ring camera attached to his residence. KCPD Crime Analystist utilized department resources and a photo from the Missouri Department of Revenue and identified the person that went to the victim's residence with a rifle, on 08/30/2024, as **D'Aires Gadson**. On the surveillance video, **Gadson** was observed wearing a backpack with what appeared to be the buffer tube of a rifle sticking out of it.

Detectives looked at the online inmate connections for [REDACTED] and observed a connection request from **Gadson** and listed his relationship to [REDACTED] as his brother. Detectives listened to one of [REDACTED]'s calls from 10/04/2024 (day after the homicide). During the call, [REDACTED] asks a female if she has heard from "D" because he wasn't answering his phone calls and he heard someone got shot at [REDACTED]. The female said she had heard from "him" and her "brother" (unknown if she is referring to them as the same person) said don't worry about the \$1,400 and that somebody got shot at [REDACTED]. "He" told her [REDACTED] would know what he's talking about. At first [REDACTED] stated he didn't know what the \$1,400 was that she was talking about, but then said he did and that it was about the Cadillac. The female then stated "he" told her to look up what happened at [REDACTED] and that there was an altercation and they got into it and a "dude" died. When [REDACTED] heard this, he started laughing. [REDACTED] later stated the phones turn off at 11 o'clock so he was going to call "**D'Aires**." The female told [REDACTED] no, but [REDACTED] responds that the phones turn off at 11 so he's going to call "D." [REDACTED] then tells the female to call "him" on three way and that he [REDACTED] needs to watch the news because that "shit" is wild. A male then got on the phone and talked about how he checked "the house" earlier and that "the mother fucker tried to get me though."

Detectives reviewed surveillance cameras from different neighbors' residences and observed the following: On 10/03/2024 at approximately 0941 hours (approximately 40 minutes prior to the homicide), an individual, who appears to be wearing the same clothing the suspect was wearing during the homicide, is seen walking east on [REDACTED]. The individuals face is seen on camera and appears to be **Gadson**. The individual also appears to be wearing the same black durag and has the same long dreadlocks as **Gadson** was seen having when he previously went to the victim's residence, with a rifle, harassing the victim for money. At approximately 0958 hours, an individual appears to leave [REDACTED] (an address associated to [REDACTED]). The individual appears to be wearing the same clothing **Gadson** was previously observed wearing and what the suspect was observed wearing during the homicide. At approximately 1006 hours, it appears the same individual, who is now wearing a mask to cover his face, is seen walking south on [REDACTED] towards the victim's residence. The individual stops, just north of the victim's residence, and appears to look towards the victim's residence before turning around and walking north on [REDACTED]. At approximately 1017 hours, it appears the same individual is walking west on [REDACTED] then south on [REDACTED] towards the victim's residence. At approximately 1019 hours, the individual is seen walking onto the victim's property.

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The video ends and when it resumes at approximately 1024 hours, the victim's maroon/tan Ford F-150, which could previously be seen on surveillance video, is no longer there.

On 10/05/2024, officers located the victim's vehicle (that was taken by the suspect) abandoned near [REDACTED] Kansas City, Missouri. The vehicle was towed to the city tow lot as evidence.

Detectives conducted a search warrant at [REDACTED] (address associated to [REDACTED] and the residence the individual, who appeared to be wearing the same clothing the homicide suspect was wearing, exits out of). Numerous documents and mail, addressed to **Gadson**, were observed inside the residence.

A computer search of **Gadson** in [REDACTED] online databases utilized by law enforcement) revealed the number [REDACTED] to be associated to **Gadson**. The same number is observed communicating with [REDACTED] on his [REDACTED] calls with a male's voice talking on it. Detectives obtained a search warrant for a Pen Register/Trap and Trace (PRTT), as well as cellular data, for phone number [REDACTED]. The search warrant was executed on 10/21/2024.

On 10/21/2024 at approximately 1635 hours, **Gadson** was tracked by the PRTT and was taken into custody. **Gadson** resisted arrest and a loaded Cobra .380 caliber handgun (serial number [REDACTED]) was located in his possession. [REDACTED]

On 10/21/2024 at approximately 1912 hours, **Gadson** was escorted from his cell and into an interview room located at Metro Patrol, 7601 Prospect Avenue, Kansas City, Missouri. **Gadson** was read his Miranda Rights from Form 72 P.D. to which he stated he understood his rights. **Gadson** provided his phone number as [REDACTED]

He initially stated he knew the victim, but had never spoke to him or went to his residence. He also initially stated he had never been in the victim's Ford F-150. Later in the interview, **Gadson** stated he did go to the victim's residence, armed with a rifle. He stated he frequently carries firearms for protection and would frequently contact the victim in an attempt to collect money he was going to pay him. On the day of the homicide, he walked to the victim's residence and contacted the victim outside to see if the victim had the money he was going to pay him. The victim told **Gadson** that he had told him not to come to his residence. The victim started reaching towards his pocket. **Gadson** stated he had been around enough "shit" to know what a reach looked like. **Gadson** stated he didn't want to "jump the gun" and do something to the victim when the victim wasn't going to do anything to him. The victim then told **Gadson** to let him go in the house to get the money, but **Gadson** told him no and that he couldn't let the victim go in the house. **Gadson** stated he didn't want to let the victim go too far because he felt like the victim was going to do something. **Gadson** stated once the victim realized he was not going to be able to go in the house, the victim pulled out his gun and pointed it at **Gadson**. **Gadson** looked at the victim thinking the victim was about to shoot him, but didn't really have fear in his mind. The victim fired a single shot at **Gadson**, then went down the driveway and fired two more shots. As the victim was shooting at **Gadson**, from the end of the driveway, **Gadson** returned fire with a .40 caliber firearm. At some point **Gadson** shot the victim. **Gadson** went over to the victim and checked his pocket to see if he was still armed. **Gadson** then picked up keys that were in the street and took the victim's maroon/tan Ford F-150 and

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took the victim's firearm and left the area. **Gadson** drove the victim's F-150 down side streets to an unknown location in the "60's or 70's" and parked the F-150 and threw is .40 caliber firearm to get rid of it at an unknown location. **Gadson** stated he never got back in the truck. **Gadson** stated he did not stay to talk to police because he knew they wouldn't believe him with him being a convicted felon. **Gadson** initially stated he got rid of the victim's firearm, but later stated the firearm he had in his possession, when he was arrested, was the victim's firearm that he took. **Gadson** was told that surveillance video shows him shooting at the victim first, but **Gadson** continued to state the victim drew his firearm and shot first. **Gadson** also denied knowing [REDACTED]

Printed Name /s/ Det. Grant Spiking #5484 Signature /s/ Det. Grant Spiking #5484

The Court finds probable cause and directs the issuance of a warrant this 22-Oct-2024 12:22 pm day of [REDACTED].

Judge

Circuit Court of [REDACTED] County, State of Missouri.