## **FILED DIVISION 26**

CIRCUIT COURT OF JACKSON COUNTY, MO

KE Truck Willing

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

POLICE NO.: KC24077478 PROSECUTOR NO.: 095481397 OCN: 1I001189 STATE OF MISSOURI, PLAINTIFF, VS. TRACY L. PARKER JR. **4326 FOREST AVE CASE NO. 2416-CR** Kansas City, MO 64111 DIVISION

DOB: Race/Sex: B/M S.S.N.:

**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 13, 2024, in the County of Jackson, State of Missouri, the defendant knowingly, with the purpose of causing serious physical injury to , caused the death of by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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 October 13, 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.

# Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about October 13, 2024, at E 35<sup>th</sup> St and Cleveland Ave, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person, of the above described conduct, suffered injury or death.

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 IV. 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 October 13, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant

committed the foregoing felony of unlawful use of a weapon 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 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/ Gerald Jackson

Gerald Jackson (#66995) Assistant Prosecuting Attorney 415 East 12th Street 11th Floor Kansas City, MO 64106 (816) 881-3555 gjackson@jacksongov.org

#### **WITNESSES:**

The State's witnesses as of 10/24/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

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Printed Name Det. Zakary Glidewell #5549 Signature /s/ Det. Zakary Glidewell #5549

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

Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.

PROBABLE CAUSE STATEMENT FORM

Date: 10/24/2024

CF N: KC24077478

24-Oct-2024 13:33

CIRCUIT COURT OF JACKSON COUNTY, MO

BY DCA

CROWN COUNTY, MO

BY DCA

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 10/13/2024 , at in

Kansas City, Jackson County (County) Missouri Parker, Tracy L (Name of Offender(s))

B/M (Description of Identity) (County) (County) (County) (Name of Offender(s))

The facts supporting this belief are as follows:

On 10/13/2024 at 1730 hours, Officers were dispatched to E 35 Street and Cleveland Avenue in regard to a reported shooting. Upon their arrival, a male victim was located at suffering from multiple gunshot wounds. The Kansas City Fire Department arrived to the scene and confirmed that the male victim was deceased.

Detectives and crime scene technicians responded to the scene. Numerous shell casings were recovered from the parking lot. A deceased black male victim was observed lying in the parking lot and was taken to the Jackson County Medical Examiner's Office. The preliminary anatomic diagnosis stated that the cause of death was multiple gunshot wounds and the manner was homicide.

Cameras were located at the business on the exterior and interior of the building. Forensic Specialist responded to the location and recovered the video in regard. Upon reviewing the camera footage at 1724 hours on the DVR system, a black 2002 Chevrolet Blazer Extreme was observed backing in to the parking lot and the driver exited the vehicle and went into the business. At 1725 hours, a silver 2018 Chevrolet Malibu arrived to the business and the victim in the investigation exited from the passenger side and entered the business.

At 1727 hours the victim exited the business and returned to the silver Malibu and opened the front passenger door. The victim then walked away from the Malibu and towards a black male dressed in all black with a black bandana wrapped around his head standing near the black Blazer as the driver of the Blazer exited the business. Both the victim and the driver appear to hand the black male with the bandana something. As the victim was observed walking back to the Malibu he appeared to be talking and nodding his head towards the Blazer.

The front passenger door of the Blazer opened and a black male with long thick braids and a short beard dressed in a white t-shirt and black shorts (suspect) exited the vehicle and pointed a black pistol towards the victim. The victim raised his hand up in the air and began to back away from the suspect. The suspect then

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walked forward towards the victim and began shooting. The suspect then returned to the front passenger seat and the driver got back into the driver's seat. The Blazer fled the scene south on Cleveland.

The victim fell to the ground in front of the Chevrolet Malibu. The black male dressed in all black with a black bandana wrapped around his head walked over to the victim and appeared to pull a pistol from the victim's front right pocket and fled east on E 35th Street.

A witness at the scene stated they have been dating the victim for approximately five years. He only knew the victim as "and picked him up at Aldi located at 39<sup>th</sup> and Prospect Avenue." wanted marijuana and he needed something to roll the marijuana so they stopped at the convenience store at 3801 E 35th Street to

get the "shells" and beer. When the victim came out of the store he asked the witness for some change to give to a male called ". The witness gave the victim some loose change from the center console and he went over to the male. While the victim was heading back to their car, the suspect exited from the vehicle that was backed into a spot near them, possibly a Ford Flex, and then shot the victim multiple times. The suspect was described as a black male with dreads and dark colored skin with a larger nose.
After reviewing the surveillance footage from business at observed to have what appeared to be a Missouri license plate and stickers affixed to the bottom left and right corner of the rear window glass. The vehicle was located on city-maintained street cameras at E 39th Street and Cleveland. A search of license plate readers was conducted in regard. The vehicle was observed travelling westbound from 43 <sup>rd</sup> and Prospect at 1730 hours bearing the Missouri license plate of the license plate resulted in the vehicle being identified as a 2002 Chevrolet Blazer VIN registered to
A screen snipping from the interior of the business of the driver of the Chevrolet Blazer was captured and ran through department computer databases. The driver was identified as being B/M  A screen snipping of the suspect during the shooting was captured and was also ran through department computer databases. He was identified as being PARKER, Tracy L B/M  PARKER was observed through the department computer databases as being on supervision for possession of a firearm and was listed as a felon. His probation and parole officer was contacted and was shown the screen snipping from the surveillance video, and also shown the video, and confirmed that it was PARKER in the video.
The probation officer advised that PARKER has been in contact with them about meeting to update the employment status and other information that is a part of the supervision agreement. PARKER called using the phone number . A check through the computer databases of the phone number was conducted. The phone number was registered to who is the father of .  During that meeting, PARKER arrived with a buzzed short hairstyle. He provided information that he scheduled to have an interview at Arthur Bryant's off of on 10/14/2024.
Detectives responded to Arthur Bryant's location on 10/16/2024 and received copies of the application form. Management at the location advised PARKER was hired and was supposed to return on 10/15/2024 to begin working, but did not show up. On his application he provided the cell phone number.

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A historical phone order was conducted for the showed that the number was contacted 23 times from 09/01/2024 to the date the order was executed on, 10/16/2024. The phone in the records appeared to be registered to a search of computer databases showed that when PARKER was a juvenile, was listed in several reports as his guardian.
On 10/21/2024, a parole violation was issued for PARKER and he was arrested by the US Marshal Service and KCPD Fugitive Apprehension Detectives. While being arrested, he ran from the Deputies and Detectives and threw a Smith and Wesson M&P Shield 9mm pistol on the ground. The pistol was recovered and a check of the serial # through computer databases revealed the pistol to be stolen.
Parker was transported to Police Headquarters located at 1125 Locust Street. Parker was read the Miranda Warning and advised that he understood his rights. He was provided the Miranda Warning form used by the US Marshal Service and signed the form in regard.
PARKER was shown a single photograph of the black 2002 Chevrolet Blazer that was a snipping of the surveillance video from  He advised that he did not recognize the vehicle. He was then shown a single photograph of  He advised that he knew him as "". Parker then advised that "is is the brother to his sister who is deceased. He advised that "" is a half sibling to his sister and he is also a half sibling to her. His mother is  Parker said that he doesn't hang around ""."
PARKER advised that he heard about the shooting and knew the victim. He advised that the victim shot him when he was a teenager and was in prison with him. While in prison they fought. The last time he saw him was in approximately 2009 in Boonville and he knew him as ". The dispute started over a phone with some of his friends. Parker stated that shot up his mother's house and has approached his family in the past to "deliver a message". Parker said that was telling people that Parker was a "rat".
PARKER stated that he was at and observed the victim arrive to the location. He arrived in what he believed to be a green or grey colored Chrysler 300. He did not recognize right away because he had lost a lot of weight.  Parker remained in his vehicle.  Parker remained in his vehicle.  Existed the store and went to his vehicle and leaned into the passenger side and came back out and walked behind the car Parker was sitting in the passenger seat of.  Called out to Parker saying that they had to talk, but he did not know what grabbed out of the car. Parker knew at that time that it was going to do.
PARKER said that he got out of the car and started shooting at times he shot, but the gun he had still had bullets in the magazine. PARKER then advised that the gun he used was gone and he did not know where it was. He also did not know where the Chevrolet Blazer was. He said that had no involvement in the shooting and did not know.
A search warrant for a buccal swab for PARKER was executed and he was transported to Metro Patrol Detention where he was held on the 24 hour investigative hold.

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Printed Name Det. Zakary Glidewell #5549	Signature /s/ Det. Zakary Glidewell #5549
The Court finds probable cause and directs the issuance of a warrant this day of	

Circuit Court of \_\_\_\_\_ County, State of Missouri.