

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

POLICE NO. :	KC24022488
PROSECUTOR NO. :	095481463
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
RE'MORI T ROATH	)	
5521 Manning Ave.	)	CASE NO. 2416-CR
Kansas City, MO 64133	)	DIVISION
DOB: [REDACTED]	)	
Race/Sex: B/M	)	
S.S.N.: [REDACTED]	)	
DEFENDANT.	)	

**COMPLAINT
WARRANT REQUESTED**

**Count I. 565.021 - Murder 2nd Degree - Felony Murder - During
Perpetration/Attempted Perpetration/Flight From Perpetration Of A Felony, A
Person Dies (565.021-003Y20200999.0)**

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 April 10, 2024, in the County of Jackson, State of Missouri, [REDACTED] was killed by being shot as a result of the perpetration of the class A felony of Unlawful Use of a Weapon—Subsection 9 Shooting at a Habitable Structure under Section 571.030.9, RSMo, committed by the defendant on or about April 10, 2024, in the County of Jackson, State of Missouri.

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) (571.015.2) (571.015.3), RSMo, in that on or about on or about April 10, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the 2nd Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the 2nd 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 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 April 10, 2024, at [REDACTED], Kansas City, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a habitable structure, and, as a result of the above described conduct, [REDACTED] 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 (571.015-001Y20205213.0)

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) (571.015.2) (571.015.3), RSMo, in that on or about on or about April 10, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon--Subsection 9, Shooting at a Habitable Structure in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon--Subsection 9, Shooting at a Habitable Structure 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.

PROBABLE CAUSE STATEMENT FORM

Date: 05/16/24

CRN: KC24022488

I, 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 04-10-2024, at in
(Date) (Address)

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

Black Male committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 04-10-2024 at approximately 2150 hours, Officers of the Kansas City, Missouri Police Department were dispatched to on a reported shot spotter call. Officers were updated en-route a shooting had occurred at , Kansas City, Jackson County, Missouri. Upon arrival officers entered the open front door of the residence and located a juvenile female victim suffering from apparent trauma to her head. Officers performed life saving measures until KCFD-EMS responded and transported the victim to an area hospital, where she was declared deceased at 2241 hours as a result of her injuries. Six additional victims, not struck by gunfire, were located inside the residence, as well.

Detectives obtained a search warrant for . The east facing glass storm door was shattered with glass on the front porch and into the interior front room of the residence. Pools of apparent blood were located inside the front door of the residence and in the dining room, on the front porch, down the stairs and onto the sidewalk near the street. Detectives observed one spent 9mm casing on the front porch, and 11 additional spent 9mm casings around the yard and leading up to the front porch. Inside the residence, detectives observed apparent bullet defects in the interior walls. Crime Scene Technicians located two spent bullets inside the walls and a spent bullet, on the floor, in the interior entryway. Detectives also observed clear plastic baggies containing a green leafy substance, believed to be marijuana, on a table in the front living room area. Next to the green leafy substance, was a small scale.

Officers spoke to an occupant of the residence, , who stated she was communicating with an unknown individual via Snapchat about selling them marijuana. The unknown individual stated they were at the location in a white vehicle. and the other occupants of the residence went inside of , and shortly after that, someone started shooting into the residence through the front storm glass door, striking the victim who was inside .

Detectives spoke to a neighbor, , who stated she was inside of her house and heard gunshots at approximately 2150 hours. She looked out her window and observed a party walking down the stairs that lead to

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██████████. The party was wearing all black and had a black mask on to where only their eyes were visible. The party got into the driver's seat of a light colored SUV and left the area driving south on ██████████. She did not observe any other individuals.

Detectives reviewed city surveillance video, near ██████████, and observed a white or gray SUV approach the area traveling west on ██████████, then turning south on ██████████ at approximately 2130 hours. Detectives observed the driver's side tail light appeared to be dimmer than the passenger side tail light. The vehicle appears to stop approximately mid-block in the ██████████ block of ██████████. It appears one occupant gets out of the driver's side of the vehicle, and walks to the east side of the ██████████. At approximately 2140 hours, a white sedan arrives and also appears to park mid-block on the ██████████ block of ██████████. The occupants of that vehicle get out and walk to the west. At approximately 2142 hours, an individual walked from the east side of the street to the west side of the street, near the area where the other individuals were seen walking. At approximately 2149 hours, an individual is seen walking to the white or gray SUV and gets in on the driver's side of the vehicle, then leaves the area traveling south on ██████████ at approximately 2150 hours. Police are seen arriving on scene at approximately 2152 hours.

Detectives reviewed surveillance cameras from a neighbor, ██████████. Detectives observed a light colored SUV driving south on ██████████ at approximately 2130 hours, then parked mid-block on the west side of ██████████. It appears one occupant gets out of the driver's side of the vehicle, and walks east towards what appears to be a vacant lot (just north of ██████████). The rear lights of the vehicle flash, as if the vehicle was being locked remotely. At approximately 2140 hours, a white sedan travels south on ██████████, and appears to park in front of ██████████, on the east side of the street. It appeared one occupant got out of the front passenger door and appeared to walk up the stairs to ██████████. Three other individuals appear to get out of the driver's side of the vehicle, and also appeared to walk up the stairs to ██████████. Approximately 50 seconds later, an unknown, heavier set, individual was seen coming from the west and walked east, across ██████████, and appeared to walk up to ██████████. It also appeared the individual was holding a cellphone (detectives could see what appeared to be a cellphone screen in his hands). Approximately 7 minutes and 15 seconds later, multiple gunshots could be heard. There was a rapid succession of gunfire, followed by an approximately 9 second pause, then another single shot could be heard. An individual was seen running from what appeared to be ██████████, to the light colored SUV that was previously seen on surveillance video, that arrived at approximately 2130 hours. The individual appeared to get into the driver's side of the vehicle and left the area driving south on ██████████ at approximately 2150 hours.

Detectives reviewed the License Plate Reader (LPR) at 35th Street & Woodland Avenue and observed what appeared to be the same suspect vehicle driving north on Woodland Avenue at approximately 2150 hours. The vehicle appeared to be a Chevrolet Equinox, but the LPR did not read the plate.

Detectives reviewed city surveillance cameras at Linwood Boulevard and Woodland Avenue and observed what appeared to be the suspect vehicle traveling east on Linwood Blvd, then turning south on Michigan Avenue, which leads to an on ramp to US 71 Highway southbound, at approximately 2151 hours.

Detectives interviewed ██████████, who was at the location when the shooting occurred. He stated he was using ██████████'s cellphone to talk to someone on Snapchat about selling them marijuana. The unknown individual wanted to

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meet them at [REDACTED] in Raytown (near [REDACTED]). [REDACTED] told detectives they had suspicions that the individual's Snapchat account was fake, so instead, they told the individual to go to [REDACTED]. Due to these statements, detectives believed the suspect was driving back to the Raytown area.

Detectives spoke to [REDACTED], who was present during the shooting. She stated the suspect vehicle looked like a vehicle her mom used to have. Detectives showed K.W. a stock photograph of a 2015 Chevrolet Equinox and she stated the vehicle looked just like it.

Detectives reviewed city surveillance cameras for thoroughfares that lead from US 71 Highway to Raytown, due to believing that is the direction the suspect was traveling. Detectives reviewed city surveillance cameras at 63rd Street & Indiana Avenue and observed what appeared to be the same suspect vehicle traveling east on 63rd Street at approximately 2156 hours. Detectives reviewed city surveillance cameras at 63rd Street & Zoo Drive and observed what appeared to be the suspect vehicle traveling east at approximately 2157 hours. Detectives reviewed city surveillance cameras at 63rd Street & Lewis Road and observed what appeared to be the suspect vehicle traveling east at approximately 2158 hours. Detectives reviewed city surveillance cameras at 63rd Street & Beacon Drive and observed what appeared to be the suspect vehicle traveling east at approximately 2158 hours. Detectives reviewed city surveillance cameras at 63rd Street & Winchester Avenue and observed what appeared to be the suspect vehicle traveling east at approximately 2159 hours.

Detectives reviewed the License Plate Readers (LPR) at 63rd Street and Lewis Road and observed what appeared to be the suspect vehicle traveling east at 2158 hours bearing a Missouri license plate of [REDACTED]. Detectives reviewed the LPR at 63rd Street and Winchester Avenue and observed the same suspect vehicle, bearing Missouri license plate [REDACTED] traveling east at 2159 hours.

A computer check of the license plate through Missouri Department of Revenue revealed the vehicle to be registered to [REDACTED] with a Transfer of Death (TOD) to **Remori Roath**. The registered address was revealed to be [REDACTED], Raytown, Missouri. This address is a few blocks north of [REDACTED] in Raytown, Jackson County, MO (near [REDACTED]) that was mentioned above where the unknown person on Snapchat was wanting to meet to buy marijuana from [REDACTED] and [REDACTED].

Pictures and video from License Plate Readers and city surveillance cameras revealed the suspect vehicle's driver's side tail light appears to be dimmer than the passenger side. This was also observed of the suspect vehicle that arrived and fled from the homicide scene.

Detectives obtained three tower dump search warrants for cellular data near the homicide scene, the area near 63rd Street & Winchester Avenue (where the vehicle was seen going through the LPR), and the area near [REDACTED] (registered address of the Chevrolet Equinox).

On 05-06-24, detectives received the data from T-Mobile and AT&T. The data revealed only one cellular device to be in all three areas, during the specified times, with an IMSI number of ([REDACTED]). The cellular data revealed the device to be in the area, during the same times, as what was observed of the suspect and suspect vehicle utilizing surveillance cameras and LPR technology. A search of the IMSI number in the cell tower logs revealed that IMSI number to belong to phone number [REDACTED]. A computer search of that number in

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CLEAR and LexisNexis Accurint (online databases utilized by law enforcement) both revealed the number the belong to **Remori Roath** with a listed address of [REDACTED], Raytown, MO (same registered TOD and address that the Chevrolet Equinox is registered to).

Due to only one IMSI number to be at all three tower dump locations, during the specified times of occurrences, it is probable to believe that the suspect involved in the homicide was in possession of this cellular device.

[REDACTED] provided her Snapchat account and detectives obtained a search warrant for the data and content of the account. Detectives observed a conversation from [REDACTED]'s account to another account with the username "remoriroath" on 04-10-24 at 1937 hours. "Remoriroath" asked [REDACTED]'s account if there were any deals. [REDACTED]'s account replied, "yea 30 shots for free." "Remoriroath" replied, "huh" and [REDACTED]'s account replied, "you'll figure it out."

Detectives obtained a court order/search warrant for a pen register/trap and trace for the IMSI number above. The data revealed the subscriber of the device to be **Remori Roath** with an address of [REDACTED], Kansas City, MO. The location data revealed the device to leave the area of [REDACTED], travel to the homicide scene, then go back to the area of [REDACTED] on 04-10-24. The times of the device movement matched what was observed on surveillance video and LPR data of the suspect and suspect vehicle. The location history of the device made it apparent that the owner of the device is living in the area of [REDACTED].

On 05-14-24, detectives observed an individual, matching the description of **Remori Roath**, exit the residence and get on a school bus to an area school. After the bus dropped everyone off, detectives spoke to the driver, who confirmed **Remori Roath** had been on the bus. **Remori Roath** was arrested at the school and was not in possession of a cellphone. The aforementioned Chevrolet Equinox, bearing Missouri license plate [REDACTED] was also parked in the driveway of [REDACTED]. The aforementioned cellphone location was still revealing it to be in the area of [REDACTED].

On 05-14-24, detectives obtained a search warrant for [REDACTED]. During the search of the northwest bedroom, a paper Missouri driver's license with the name **Remori Roath** and address of [REDACTED] was located in the dresser drawer. Prescription medication with the name **Remori Roath** was also located in the dresser drawers. The room appeared to have men's clothing. In the same bedroom, a Glock 17 9mm (serial # PHP816) was located under the mattress with a fully loaded 31-round capacity magazine in the firearm. Also in the bedroom, was a red backpack with 19 live 9mm rounds in a clear plastic baggie. A purse type bag was located in the bedroom that contained a plastic jar containing a green leafy substance individually wrapped in clear plastic baggies (approximately 26 grams). A cellphone was also located on the bed, in the same bedroom. To preserve the integrity, the device was placed in airplane mode. Career Criminal detectives advised the device, that had the trap and trace, was no longer online, after it was placed in airplane mode (indicating it was the same device as what was at the homicide scene). A black face mask was also located in the bedroom on top of the dresser. Detectives spoke to **Remori Roath's** mother, who stated she, **Remori**, and Remori's two younger sisters are the only ones that live in the house.

The Kansas City Police Crime Lab did ballistic testing on the firearm, recovered from [REDACTED]. The results revealed the 9mm casings, recovered from the homicide scene, were fired from the Glock 9mm that

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was recovered from [REDACTED]. A search warrant for a buccal swab for **Remori Roath** was obtained and a buccal swab was collected from **Remori Roath**. The lab determined **Remori Roath's** DNA was located on the trigger to the Glock 9mm that was located in **Remori Roath's** room and that was used in the homicide. The lab also concluded the green leafy substance, found in **Remori Roath's** room was marijuana.

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 _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.