

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

**Police# 16-035596
Prosecutor# 095432347
1616-CR
OCN# 5180**

COMPLAINT

STATE OF MISSOURI

vs.

**Daniel L. Wilson
LKA: 5925 Paseo
Kansas City, MO 64130
DOB: 06/04/1991; Race/Sex: B/M;
SS# 486-06-8198
Defendant.**

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about May 20, 2016, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Tyrone London (DOB: 01/13/1989) by shooting him.

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.

Murder in the first degree is a class A felony, and the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor; except that, if a person has not reached his sixteenth birthday at the time of the commission of the crime, the punishment shall be imprisonment for life without eligibility for probation or parole, or release except by act of the governor.

Count II. Armed Criminal Action (571.015-001Y19755213.0)

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 **Unclassified felony of armed criminal action**, punishable upon conviction under Section 571.015.1, 571.015.2, and 571.015.3 RSMo, in that on or about May 20, 2016, in the county of Jackson, State of Missouri, the defendant committed the Class A Felony of Murder in the First Degree as charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing Class A Felony of Murder in the First Degree as charged in Count I by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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.

THE STATE OF MISSOURI

vs.

Daniel L. Wilson

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

James F. Stigall (#65391)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, Missouri 64106
(816) 881-3538
JStigall@jacksongov.org

WITNESSES:

DET Leland W. Blank , 1125 Locust, Kansas City, MO 64106

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██

DET Jason C. Findley , 1125 Locust, Kansas City, MO 64106
DET Wayne C. Fitzner , 1125 Locust, Kansas City, MO 64106
DET Daniel W. Frazier , 1125 Locust, Kansas City, MO 64106
DET Ray H. Lenoir , 1125 Locust, Kansas City, MO 64106

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Tyrone London , 4622 Willow Ave., Kansas City, MO 64133

██

DET Kristofer R. Oldham , 1125 Locust, Kansas City, MO 64106
PO Robert J. Vivona , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 05-24-2016

CRN: 16-035596

I, Det. Daniel Frazier #5180 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 05-20-2016, at 4622 Willow Av in (Date) (Address)

Kansas City, Jackson Missouri Daniel L. Wilson B/M 06-04-1991 (County) (Name of Offender(s))

SSN: [REDACTED] committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows:

On May 20, 2016 at 8:30 a.m., Officers of the Kansas City, Missouri Police Department responded to 4622 Willow, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival officers discovered the victim in the living room deceased from apparent gunshot wounds. Jackson County Medical Examiner ruled the victim's death a murder.

A witness described the suspect as arriving at the residence at about 8:30 a.m. to pick up the mother of his baby and the baby to take them to an appointment. She saw him enter the front door and walk towards the staircase. When he entered her boyfriend, the victim Tyrone London, was sitting on the living room floor changing a baby's diaper. He and the suspect had an ongoing feud over a past fight they had. She described them as eyeing each other as the suspect went upstairs. The suspect then came down the stairs with a gun in his hand and said "I'll take your life right now". The victim said something like, not here in front of the kids let's just fight or words to that effect. She was trying to push the victim upstairs and the suspect's girlfriend was trying to get the suspect to leave. The suspect pushed his girlfriend aside and fired several times at the victim. After the victim fell to the floor the suspect fired several times more at him then fled the scene. The witness picked the suspect out of a line-up and the suspect was identified as Daniel L. Wilson.

Another witness stated the victim is her brother and the suspect, who she identified as Wilson is the father of her child. Wilson came to pick-up the witness at her residence. Wilson came into the residence and upon entering the residence he and the victim, began staring at each other. The witness indicated that the victim and Wilson were involved in a previous physical altercation and they were not on good terms. The witness heard Wilson say, "I can fight and I can shoot!" The victim replied, "Let's do this." Wilson pushed the witness aside, pulled a handgun from his clothing, pointed it at the victim and shot three times. The victim fell to the ground and Wilson fled the scene. The witness knows Wilson to drive an older white car with duct tape on the rear driver's side window.

Another witness was contacted who identified himself as the victim's brother and he identified the suspect as "Daniel", the father of his sister's infant son. He advised that on the morning this offense occurred, prior to

PROBABLE CAUSE STATEMENT FORM

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the arrival of the suspect, his sister advised the victim that the suspect was coming over and she asked him to go to the garage and wait there until the suspect leaves. He advised that the victim refused to move to the garage however the victim stated that he wouldn't confront the suspect. When the suspect came into the residence, the victim was still on a "pallet" with his girlfriend on the floor in the living room where they slept the night before. The suspect walked through the living room past the victim, walking behind the victim's sister. He advised that as the suspect and his sister are walking up the stairs, he sees the suspect going for his gun. This witness then ran to the front door of the residence and then heard gunshots as he opens the door to exit. He stated that the suspect then ran past him as he exited the residence. This witness identified a photograph of Daniel Wilson as the person he referred to as Daniel, the father of his sister's infant son.

Another witness stated she had put her child on the school bus when she heard three gunshots coming from the area of 4622 Willow Ave. She then saw a younger black male exit the address and get into what she believed to be an older model Chevy Monte Carlo. She described the Monte Carlo a white, dirty and to have the rear driver's window covered by "Silver tape". The Monte Carlo left the residence and drove around the neighborhood for a few moments before leaving eastbound on 47th St.

On 5/24/2016 **Wilson** was arrested for investigation of this offense. He was transported to 1125 Locust for questioning. **Wilson** was advised of his Miranda Rights at which time he invoked his right to an attorney.

Printed Name Det. Daniel Frazier #5180

Signature Det.  #5180

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

Judge

Circuit Court of _____ County, State of Missouri.