

**IN THE CIRCUIT COURT  
OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

Police# 16-05656  
Prosecutor# 095433730  
1616-CR  
OCN# CA007073

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Terrell A. Ingram  
7808 Wallace Ave.  
Kansas City, MO 64138  
DOB: 11/14/1995; Race/Sex: B/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Murder 2nd Degree (565.021-001Y19840999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of **Choose either 14.04 or 14.06**

**Mach-Cr 14.04**

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 July 16, 2016, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Malik Barbour, caused the death of Malik Barbour 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.

**Count II. Armed Criminal Action (571.015-001Y19755299.0)**

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 July 16, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second 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 Second Degree by, with and through, the knowing use, assistance and aid of a 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.

**Terrell A. Ingram**

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,

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Traci A. Stansell (#41903)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, Missouri 64050  
(816) 881-4591  
trupp-stansell@jacksongov.org

**WITNESSES:**

DET Chad Albin , 10 NE Tudor, Lee's Summit, MO 64086  
DET Erika Albin , 10 NE Tudor, Lees Summit, MO 64086  
PO Bradley Anders , 10 NE Tudor, Lee's Summit, MO 64086  
Malik Barbour , 8004 E. 118th Terrace, Kansas City, MO 64134

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PO James Brock , 10 NE Tudor, Lee's Summit, MO 64086  
SGT Greg Bryant , , ,

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PO Nathan Cantrell , 10 NE Tudor, Lee's Summit, MO 64086  
PO Jonathan Cooley , 10 NE Tudor, Lee's Summit, MO 64086  
PO Kevin Dibben , 10 NE Tudor, Lee's Summit, MO 64086  
DET Scott Doumitt , 10 NE Tudor, Lee's Summit, MO 64086  
PO Steven Eagleburger , 10 NE Tudor, Lee's Summit, MO 64086

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PO Amanda Geno , 10 NE Tudor, Lee's Summit, MO 64086

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DET Aaron Ide , 10 NE Tudor, Lee's Summit, MO 64086  
PO Jason Irr , 10 NE Tudor, Lee's Summit, MO 64086  
PO Larry T. Jones , 10 NE Tudor, Lee's Summit, MO 64086  
DET Mitch Kelley , 10 NE Tudor, Lee's Summit, MO 64086  
DET John Kudzinski , 10 NE Tudor, Lee's Summit, MO 64086  
PO Scott McMilian , 10 NE Tudor, Lee's Summit, MO 64086

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PO Kent Miller , 10 NE Tudor, Lee's Summit, MO 64086  
PO Paul Myers , 10 NE Tudor, Lee's Summit, MO 64086

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PO Erica Osborn , 10 NE Tudor, Lee's Summit, MO 64086  
PO Stephen Owings , 10 NE Tudor, Lee's Summit, MO 64086  
PO Aaron Paris , 10 NE Tudor, Lee's Summit, MO 64086  
SGT Josh Patterson , 10 NE Tudor, Lee's Summit, MO 64086

PO Michael Reese , 10 NE Tudor, Lee's Summit, MO 64086  
SGT Dave Schumaker , 10 NE Tudor Rd, Lees Summit, MO 64086  
PO Jeff Short , 10 NE Tudor, Lee's Summit, MO 64086  
PO Phillip Stewart , 10 NE Tudor, Lee's Summit, MO 64086  
PO James Treacy , 10 NE Tudor, Lee's Summit, MO 64086  
PO Alex Walker , 10 NE Tudor, Lee's Summit, MO 64086

## STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 16-5656

Date: August 5, 2016

I, Detective James Treacy, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 7/16/16, at 1524 SE Long Pl., Lee's Summit, Jackson County Missouri, Terrell A. Ingram, b/m, 11/14/1995, SSN [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 7-16-2016 at about 0255 hrs officers of the Lee's Summit Police Department were conducting a vehicle stop in the area of SE 7<sup>th</sup> Street and SE Country Lane when they heard at least 9 gunshots east of their location. Shortly after, officers were dispatched to the area of SE Long Lane and SE Long Place after reports of someone being shot. When officers arrived in the area they were directed to the driveway of 1524 SE Long Place where they observed black male on the sidewalk. He was later identified as Malik BARBOUR. Officers reported that BARBOUR had visible gunshots to the face, abdomen and leg. BARBOUR showed no signs of life. Lee's Summit Fire Paramedics responded to the scene, lifted the victim's shirt and applied two pads to check for a pulse. There was no sign of a pulse and the Fire Department Captain "called it" on scene. "Called it" is a term commonly used to describe that a person is deceased. While processing the scene, officers located four spent .357 Sig shell casings.

A witness to the shooting, [REDACTED] stated that she had observed the victim (BARBOUR) have a verbal confrontation with the suspect. The suspect stepped out of the vehicle and shot 4-6 times. BARBOUR attempted to run, but fell a short distance away. The suspect paused, then approached BARBOUR and fired two more shots. The suspect then entered a nearby parked Jeep Grand Cherokee as a passenger and was driven away from the area. MEANS described the suspect as wearing dark framed glasses, large diamond earrings and a bright green shirt with red and white stripes.

Officer Osborn made contact with DreShawn JENKINS on scene, who stated there were people at the party that were not invited, nor had he ever seen them before. JENKINS stated the males arrived in an older 90's model Jeep Cherokee. JENKINS then left the party and as he approached a nearby intersection, he heard gun shots.

During the course of the investigation, it was learned that prior to coming to Lee's Summit, the occupants of the Jeep Grand Cherokee had attended a party at 3016 Cherry Street in Kansas City, MO. They had gone to the 7-11 convenience store located at Gilham and Lynwood in Kansas City after that party and before coming to Lee's Summit. Surveillance video from that store was obtained. The video was filmed on 7-15-2016, several hours before the shooting of BARBOUR and was suspected to have footage of the possible suspect. In the video a person wearing a bright green shirt and what appeared to be dark blue or purple framed glasses was observed in the store. He enters and leaves with two other black males who are wearing jeans and white t-shirts. One of them is wearing a gray St. Louis hat and one is wearing a green and yellow Oakland A's hat.

On 07-17-2016, JENKINS told detectives he recognized one of the black males standing in the street next to the Jeep Cherokee the night of the homicide as [REDACTED]. They contacted another witness [REDACTED], who said he recognized [REDACTED] through social media and because they had worked together at the Wal-Mart on State Line [REDACTED] also said that when they worked together,

██████████ drove a dark red Jeep Cherokee and that he had seen photos of ██████████ Jeep Cherokee on ██████████ social media.

On 8-2-16, detectives made contact with ██████████ ██████████, who is the cousin of ██████████ ██████████ explained ██████████ told him that he had witnessed someone's murder after the victim, Malik BARBOUR had a gun out and was waving it around. ██████████ ██████████ could not remember anything else of the conversation other than seeing a Snapchat post by ██████████ which was earlier in the day and him recognizing an individual in the post as one of "the twins." ██████████ ██████████ could not remember his name, however stated they lived very close to his residence. The detective pulled up Google Maps on his phone and ██████████ ██████████ pointed to a residence at 11609 E. 60<sup>th</sup> St, Kansas City, MO. In front of the residence on the Google maps satellite was a gray Jeep Cherokee.

Through previous contacts with Raytown School Officials, which is where ██████████ ██████████ attended high school, the detective recognized ██████████ as, ██████████ or ██████████, who lived at ██████████ E. ██████████ St.

On 8-3-2016, contact was initially made with ██████████ ██████████ at his work place at the Ford Motor Plant in Liberty, Missouri where he was interviewed. During the interview with ██████████ he stated his brother; ██████████ drives a gray Jeep Grand Cherokee. Detectives showed ██████████ the 7-11 surveillance video and he made the comment, "well yeah there he is." Detectives confirmed with ██████████ he was talking about his brother, ██████████ They then contacted ██████████, who stated that he was in fact present at the shooting and did drive a Jeep Cherokee. After the shooting, ██████████ stated he left the area in his Jeep Cherokee with another person he named as Terrell INGRAM. ██████████ said he did not see who shot BARBOUR. ██████████ also described where he was parked in the area, which was the same area that the witnesses described the Jeep Grand Cherokee as being parked.

During the investigation, the 7-11 video was shown to one of the people who witnessed the shooting. They stated the male in the green shirt was the same person they had observed shooting BARBOUR. The male in the green shirt was also determined to be in the company of ██████████ the driver of the Jeep Cherokee. The same video was also viewed by ██████████ in his interview. When watching the video, ██████████ identified himself and the male in the green shirt as INGRAM.

Detectives made contact with ██████████, who arrived at Police Headquarters for an interview. In the recorded interview ██████████ stated he witnessed the shooting, and a person he knows as "Terrell" shot BARBOUR. ██████████ said Terrell was wearing a green shirt and dark framed glasses. ██████████ was shown the video from 7-11 and identified the person previously identified as INGRAM as the shooter.

A search warrant was executed on Ingram's residence at 7808 Wallace Ave., Kansas City, MO 64138. The following items were located in the residence:

- 1 green Polo shirt with red, white and blue logo on right sleeve, which appears to be consistent with the same shirt worn by INGRAM in the 7-11 surveillance video
- 1 pair of Puma, blue and white shoes, which appear to be consistent with the same shoes worn by INGRAM from the 7-11 surveillance video
- 1 pair of tan colored pants, which appear to be consistent with the same pants worn by INGRAM in the 7-11 surveillance video
- one empty .357 Sig, 125 grain, full metal jacket ammunition box

A search warrant was executed on a 1998 Chevy truck that INGRAM was stopped and arrested in. The following items were located in the vehicle:

-a Glock model 19 containing 14 rounds of 9mm HRTRS ammo.

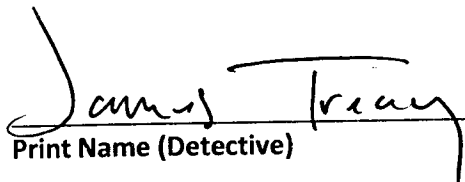
A computer check of the handgun was conducted and it returned as a stolen firearm out of Kansas City, KS on 7-26-16.

On Friday, 5 August 2016 Det. Albin, executed a search warrant on a mobile phone that had been recovered from the suspect's vehicle, Terrell Ingram. The mobile phone as a Samsung Galaxy Core Prime (SM-G360T). He viewed the following events that occurred on his mobile phone:

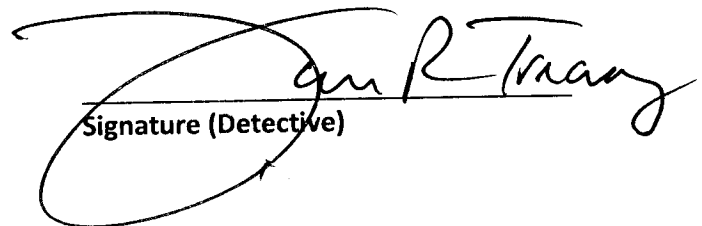
1. 16 July 2016 01:43 AM (UTC-5): Phone call to 816-274-1864, "JD".
2. 16 July 2016 03:39 AM (UTC-5): Phone call from 816-274-1864, "JD".
3. 16 July 2016 11:30 AM (UTC-5): Accessed webpage [www.fox4kc.com](http://www.fox4kc.com).
4. 16 July 2016 01:15 PM (UTC-5): Accessed webpage [www.glockstore.com](http://www.glockstore.com) and viewed a page to purchase a "Glock Factory Barrel".

As he continued to search data stored on the mobile device he discovered a picture of T. Ingram taken on 16 July 2016 at 8:50 PM (UTC-5). The picture was taken from a camera of a Samsung Galaxy Core Prime (SM-G360T) mobile phone. The photograph show the suspect, Terrell Ingram, wearing a green colored shirt and blue/purple glasses. The shirt and the glasses appear to be the same shirt and glasses described by witnesses that saw Ingram at the incident in which the victim, Malik Barbour, was shot and killed.

The same shirt was recovered during the execution of a search warrant at T. Ingram's residence on 4 August 2016. T. Ingram was wearing the same glasses when he was arrested on 4 August 2016.

  
Print Name (Detective)

**THE COURT FINDS PROBABLE CAUSE.**

  
Signature (Detective)

\_\_\_\_\_  
DATE

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JUDGE