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

Police# 16-023185 Prosecutor# 095434675 1616-CR OCN#

COMPLAINT

STATE OF MISSOURI

VS.

Rahnesha A. Carson
7110 College
Kansas City, MO 64130
DOB: 12/14/1994; Race/Sex: B/F;
SS#

Defendant.

Count I. Accessory Robbery 2nd Degree (569.030-001Y19791299.2)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.030, RSMo, committed the class B felony of robbery in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about April 3, 2016, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, forcibly stole a firearm in the possession of Jacob Brantner.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count II. Hindering Prosecution Of Felony (575.030-001Y19755099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.030, RSMo, committed the class D felony of Hindering Prosecution, punishable upon conviction under Section 558.011, and 560.011, RSMo, in that on or about April 3, 2016, in the County of Jackson, State of Missouri, the defendant, for the purpose of preventing the apprehension of Fazon Swinton for conduct constituting the crime of robbery, provided Fazon Swinton with transportation.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or

other authorized penal institution; or by a fine not to exceed five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count III. Accessory Leaving The Scene Of A Shooting - 1st Offense (577.068-002Y19995299.2)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.068, RSMo, committed the class A misdemeanor of leaving the scene of a shooting, punishable upon conviction under Sections 577.068, 558.011 and 560.016, RSMo, in that on or about April 3, 2016, in the County of Jackson, State of Missouri, the defendant, while either acting alone or purposely in concert with another, while in possession of a firearm, discharged such firearm causing injury to Jacob Brantner, and that thereafter, the defendant, knowing that she or another had caused injury to Jacob Brantner, left the area where the firearm was discharged without giving her name and address to a law enforcement officer or to the nearest police station.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed one thousand dollars (\$1,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count IV. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y19755099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the class D felony of tampering with physical evidence, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between April 3, 2016 and April 7, 2016, in the County of Jackson, State of Missouri, the defendant concealed a 2007 blue Ford 500 with the purpose to impair its availability in the homicide investigation of Jacob Brantner an official investigation, and thereby impaired or obstructed the prosecution of Fazon Swinton for the crime of Robbery a felony.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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.

Rahnesha A. Carson

JEAN PETERS BAKER

Prosecuting Attorney Jackson County, Missouri by,

Nichole Erickson (#52086) Assistant Prosecuting Attorney 415 E. 12th Street, 11th Fl Kansas City, Missouri 64106 (816) 881-3345 NErickson@jacksongov.org

WITNESSES:

DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106 Jacob Brantner, Prosecuting Atty. Office, Kansas City, MO 64106 Prosecuting Atty. Office, Kansas City, MO 64106

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

DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106

PO Steven R. Weber, 1125 Locust, Kansas City, MO 64106

Date: 09/30/2016				CRN: _	16-023185			
I, Det. Ray Lenoir of the Kansas City I								
(Name and identify law enforcement officer	, or person ha	ving informa	tion as probable	cause.)				
knowing that false statements on this for	m are punis	shable by la	w, state that	the facts c	ontained herein	are true.		
I have probable cause to believe that on	04/03/201	.6	, at <u>8700</u> E	E. 63 St.		in		
	(Da	ate)		ddress)				
Kansas City, _Jackson	Missouri	Rahnesha	Carson					
(County)			(Nar	(Name of Offender(s))				
b/f, 12/14/1994 SSN (Description of Identity	0		committed	one or mo	ore criminal offe	ense(s).		
Murder	"							
Robbery								

The facts supporting this belief are as follows:

On 4-3-2016 at about 2030 hours, Kansas City, Missouri Police officers were dispatched to 8700 E. 63rd street, Kansas City, Jackson County, Missouri on a shooting. Upon arrival the officers found Jacob A. Brantner, WM, 1-12-1977, lying in the parking lot deceased from an apparent gunshot wound. A witness was contacted and provided details regarding the incident. The victim met the suspect in the Price Chopper parking lot through an arrangement made over his cell phone (text messages) to sell the suspect a handgun. Several communications were made between them and they settled on the listed location as a meeting place. The victim and suspect both exited their vehicles and were discussing the sale when the suspect attempted to take the gun without paying the victim. They began wrestling over the gun and the suspect was able to grab the gun and run a distance from the victim. Both the victim and suspect pulled guns and shot at each other at which time the victim was struck by a bullet, killing him.

During the crime scene processing Detectives found shell casings in the area the suspect had fired from. They also found drops of fresh blood in the same area. Video surveillance was available and the incident was caught on camera. The suspect vehicle appears to be a 4 door Ford 500, blue in color, with a sunroof. In video it is apparent that other than the shooter, who is seen getting into the front passenger seat, the vehicle is occupied by a driver, who appears to be a female, and backseat passenger.

At the Crime Scene a black I-Phone 5 was found in the victims left front shirt pocket. A search of the phone showed that there were text messages between the victim and the number 816-429-1841 where they were arranging to meet at the Price Chopper for the sale. The number that the victim was communicating with was found to belong to a texting app owned by Talkatone LLC. The Talkatone app allows a user to obtain a separate or "ghost" phone number to be able to text and call from while using the app. A valid cell phone number is requested by Talkatone in order to verify the user's registration. A search warrant was served to Talkatone. The detailed subscriber information obtained from Talkatone showed an additional phone number of 816-812-9342 associated with the account and the device as a HTC Desire. The email address associated to the account was listed as nozaf4500@gmail.com and the name associated to the account was Nozaf Smith. A search of 816-812-9342 in the police data base showed the number to have been given to a police officer by Deveon Swinton B/M 05-26-1993 in a report written in July of 2015. In the police data base, an associate of Deveon Swinton was

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found to be Fazon Swinton B/M 08-28-1997. They were listed together in multiple reports and were noted to be brothers. Detectives noted the name on the Talkatone account was "Nozaf" which is Fazon spelled backwards.

Content of text messages from the Talkatone search warrant compliance showed several texts between the victim and the Talkatone number arranging the gun deal. Intermingled with those texts were text messages from the Talkatone number and the number, 913-293-3709. A computer check of the 913-293-3709 number showed it to belong to Rahnesha Carson B/F 12-01-1994. Rahnesha Carson had provided that number to a prior employer in January 2016 and to Penn Valley Community College.

Several texts are exchanged in which the Talkatone texter is arranging a ride with Carson and asking for a ride to Price Chopper to do a "lash" (Urban dictionary defines Lash as taking something illegally). Carson told the Talkatone number that they were on the way to pick them up. Rahnesha Carson was found to have a child in common with Deveon Swinton (Fazon Swinton's brother) and was listed in several police reports together. In one text the Talkatone number refers to Carson as "sis".

There were several texts to the Talkatone number where the name "Fazon" was used. A number texting the Talkatone number asked if the number belonged to Fazon and the Talkatone number responded "Yeah".

Rahnesha Carson was arrested on 04/14/16 in Leavenworth, KS. Carson denied being with Fazon at the time of the offense. She stated she hadn't seen him for 6 months and had no communication with him. When questioned about her vehicle, she stated that she did not own a vehicle. She also advised she was the only person in possession of her phone around the time of the homicide. She confirmed her phone number was 913-293-3709. At the time of her arrest, her cell phone was obtained. Detectives obtained a search warrant to access the phone. Several text messages were observed between Carson and "Nozaf Baby" who was later identified as Ouashanna Echols, who has a child in common with Fazon Swinton. In the text, Carson is inquiring about a third party whom she refers to as "my brother". She ask if he is okay at which time "Nozaf Baby" replies "I'm waiting for them to get him together me n his mommy bouta go in there now". Also in Carson's phone were several text messages in which she is identifying her vehicle as a blue Ford 500. She also texted the VIN to someone who was getting temporary plates for her. There were several texts to a "Baby Boy". One text in particular was on 4/4/2016 at 00:11 minutes in which she text, "I need you to go pick up my car call me ASAP". Several days later she is texting people that she is trying to sell her car. There were also texts between Rahnesha and Echols phones that discussed getting rid of a gun. Rahnesha explained that she had given it to "D" but could not find the clip. Rahnesha was told it should be in the car and that she was going to have the car towed which Echols phone responded "Noooooo don't do that." Rahnesha explained that she had a friend and texted to Echols "I got us bro."

On 04/20/16 Detectives contacted Best Value Auto Sales at 7901 Troost who provided paperwork showing Carson had bought a 2007 Blue Ford Taurus for \$1,700.00 on 3/4/2016. The dealership also mentioned that when Carson was looking to buy the car she brought a large black male to look it over for her before she made her purchase.

On 4/22/2016 Echols was contacted by detectives. She advised that on Sunday 4/3/16 she was called by Carson who told her that Fazon had been shot and they were heading to Kansas University Hospital. Echols further advised that she had been told by Fazon that he had been playing basketball in Kansas when he was shot by an unknown person.

Detectives contacted KU Hospital security who advised that Swinton had responded to the hospital on 4/3/2016 at 2118 hours with gunshot wounds.

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On 4/22/2016 Fazon Swinton was arrested on 24 hour Investigation. He was advised of his Miranda Rights and agreed to talk with detectives. Fazon told detectives he had been playing a pick-up basketball game in Kansas City, KS when he was shot. He stated that his "cousin" Rahnesha had taken him to the hospital in her orange Dodge Avenger.

On 4/23/2016 detectives responded to the University of Kansas Hospital to check on surveillance video of the emergency room from 4/03/2016. The video showed a dark blue Ford Five Hundred pulling up to the emergency room door. Surveillance showed Rahnesha Carson exiting the driver's seat of the Ford Five Hundred and Fazon exiting from the rear passenger seat.

Later on 04-23-2016 Detectives were contacted by Officers at the South Patrol Division who advised four people had walked into the lobby and advised that they believed they were driving the blue Ford 500 that had been used during the homicide. Detectives responded to South Patrol Division and contacted the owner of the car who stated on 04-06-2016 he was contacted by a black female who he knew as "Kesha" asking if he was interested in buying her blue Ford 500. The owner advised that Kesha called from her regular cell phone number of 913-293-3709. The owner decided to meet with Kesha later that day. When they met up later on 04-06-2016 Kesha did not bring the car with her. The owner asked where the vehicle was and Kesha advised that she did not want to drive it but it was located at 43rd St and College. The owner gave Kesha half of the money then and Kesha gave the owner the car keys and title to the car. On 04-07-2016 the owner responded to pick the car up. When he did he noticed the back passenger side window was broken out. The owner took it to a mechanic shop and the mechanic noticed the vehicle had an apparent bullet hole in the driver's side "A" pillar of the vehicle. The owner began doing research regarding the homicide and felt he should go to the police with the information. A check of the VIN on the vehicle the owner brought to Police verified it was the same vehicle Rahnesha had purchased just weeks prior. The owner also advised Detectives that he had gone with "Kesha" to look at the car at a car lot on Troost before she had purchased it.

The vehicle was towed for processing. Later on the owner of the vehicle called and advised Detectives that the female's real name that he bought the car from was Rahnesha, which he had found out from friends.

On 09/27/2016, Rahnesha Carson was arrested pursuant to a stop order issued by the Homicide Unit regarding this offense. Detectives read the Miranda Warning and Waiver to her and she agreed to answer questions regarding this offense. She advised that on the day this offense occurred, she received a call from the Fazon Swinton who asked her to give him a ride. She stated that he advised that he wanted her to take him to the "Price Chopper" because he was going there to purchase a gun. She stated that she responded to 3941 Norton, Kansas City, Jackson County, where she met Swinton and an unknown black male. She advised that Swinton showed her \$500 that he said he was going to use to purchase the gun with. They drove to the aforementioned Price Chopper where they met the victim in the parking lot. Swinton exited her car and contacted the victim outside the vehicle near the rear. Carson stated that while Swinton was with the victim, she and the other unknown black male remained in her car. At one point, while Swinton was with the victim, she looked in the rear view mirror and observed the victim and Swinton "scuffling" with each other. She began to drive away but the male in the back seat told her to wait for Swinton. The male held a gun to Carson from the back seat. While waiting, she heard the sound of shots and observed that two rounds struck her car. Shortly after that, Swinton came running to the car and jumped into the right front seat and stated that he'd been shot. Carson stated that she drove him to her house where she attempted to tend to his injuries using "duct tape". They decided he was too badly injured so she took him to KU Medical Center located at 39th and Rainbow, Kansas City, Wyandotte County, Kansas. She later sold her car and stated the party she sold the car to did not know the car was used in a crime.

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Printed Name	Der. F	Zay	H_	LENDIR	<u>S</u> c s	ignature)			<i>P</i>	 L. 3	#362
The Court finds	s probable	cause a	nd dir	ects the issu	ance of	a warrai	nt this_		day o	f		
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		_			Judge	•						
	a		•			~			03.61			
	Circui	it Court o	of			Co	ounty, S	state c	of Miss	ouri.		