

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

Police# 16-003481  
Prosecutor# 095435651  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Adrian D. Theus  
11606 E. 60th Street  
Kansas City, Missouri 64133  
DOB: 11/30/1998; Race/Sex: B/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841304.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 14, 2016, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, fired a handgun into a group of people standing in front of 9708 E. 65th Terrace, and such conduct was a substantial step toward the commission of the crime of attempting to cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on [REDACTED].

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 (571.015-001Y19755213.0)**

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 **Felony of Armed Criminal Action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about October 14, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First Degree 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.



## STATEMENT OF PROBABLE CAUSE

Date: 10-14-2016

Report # 16-3481

**I, Detective Joshua Wildman, an Investigator with the Raytown, Missouri Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.**

1. I have probable cause to believe that on, 10-14-2016 around 2234 hours, at 9708 E. 65<sup>th</sup> Terrace, Raytown, Jackson County, Missouri, Adrian Theus, a black male, born 11/30/1998, SS# [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 10-14-16 at 2234 hours, Raytown Police Officers were called to 9708 E. 65<sup>th</sup> Terrace, Jackson County, Raytown, Missouri on a gunshot wound.

Dispatch reported that a person had been shot at that address and that a caller was following the suspect vehicle, a silver 2 door Chevrolet Monte Carlo.

P.O. Ronald Davis observed a silver Chevrolet Monte Carlo (MO license MP7-A2H VIN 2G1WX15K919145088) traveling northbound on Blue Ridge Boulevard and E. 59<sup>th</sup> Street, Raytown, MO. P.O. Davis attempted to conduct a traffic stop on the Chevrolet and it refused to stop. A pursuit ensued with speeds in excess of 115 miles per hour. The Chevrolet drove into on-coming lanes and drove the wrong way on a one-way-road. The Chevrolet ran over stop sticks and ultimately came to a stop near S. 71 Highway and Emanuel Cleaver 2 Boulevard in Kansas City, Jackson County, MO.

P.O. Davis observed 5 black males flee on foot westbound from the Chevrolet. After a search of the area, two of the five males were located and apprehended. The Chevrolet was towed to the Raytown Police Department garage to be held for processing.

The two males were identified as Adrian Theus, a black male born 11-30-1998 and [REDACTED] a black male born 4-2-1999. The shooting victim was identified as [REDACTED], a black male born 3-20-2000. [REDACTED] was transported to Research Medical Center with a through and through gunshot wound through the left thigh, below the groin. [REDACTED] told Detectives that there was an altercation at McDonalds in Raytown prior to the shooting. He said that three males were at McDonald's trying to start a fight with his friends. He identified the three males as Adrian, [REDACTED], and [REDACTED]. [REDACTED] said a fight was broken up at McDonalds, he went to his friend [REDACTED]'s house. (9708 E. 65<sup>th</sup> Terrace) [REDACTED] said he was outside of the house and saw two people standing outside of a car shooting in his direction. He said he hit the ground and felt the gunshot hit his leg. [REDACTED] was unsure of who shot him and could not provide a description of the vehicle they were in.

Detective Wildman processed the crime scene. There were 13 .45 caliber spent shell casings and 12 .40 caliber spent shell casings recovered.

The following morning, Police Officer Ojeda was called to the area of 48<sup>th</sup> Terrace and Blue Ridge Boulevard in regards to a found handgun. There, he recovered a .45 caliber Springfield XD handgun.

[REDACTED] was interviewed by Detective Wildman at Raytown Police Headquarters. He told Detective Wildman that he was involved in a large fight at McDonald's in Raytown prior to the shooting. The fight involved a group he and his circle of friends have had previous violent altercations with. [REDACTED] said he left with Theus and two other males, who he did not know, in the Chevrolet. They drove to the area of the shooting. He said Theus and the unknown male in the front passenger seat got out and walked away from the Monte Carlo, toward a house. He heard the two fire multiple gun shots. They drove away, and a Police Officer tried to stop them. He said Theus accelerated away. During the pursuit, he said Theus threw his handgun out of the window. It was later recovered by a Raytown Officer when it was found by a passerby the following morning. [REDACTED] said the front passenger threw his handgun out of the passenger side window in the area of 40 Highway and Sterling, Jackson County, Independence, Missouri. The gun, a .40 caliber Smith and Wesson handgun, was later recovered by Detective Sergeant Chris Shrout. [REDACTED] said he ran from the Chevrolet because he was afraid.

Theus was interviewed by Detective Riddle. He told Detective Riddle he was the driver of the Chevrolet and that he initially stopped, then fled knowing the Police were trying to stop him. He told

Detective Riddle he had fired his handgun into the group of people standing in front of a house. He did it because of an on-going feud. Theus said he got out of the car and walked towards the group before firing. Theus was shown a picture of the gun that was recovered the following morning and said it was his. The gun was the .45 caliber Springfield XD handgun. Theus would not disclose the name of the other two people in the Chevrolet.

Josh Wildman  
Detective (printed)

/s/ J. Wildman #1180  
Signature

**THE COURT FINDS PROBABLE CAUSE.**

\_\_\_\_\_  
DATE

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JUDGE