

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

Police# 16-078951
Prosecutor# 095435671
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Christopher P Taylor
11401 E. Sheley Rd
Independence, MO 64052
DOB: 08/06/1977; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 October 16, 2016, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Whitney Gray caused the death of Whitney Gray by shooting her.

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 (571.015-001Y19755299.0)

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 October 16, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, 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 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 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.

Christopher P Taylor

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,



Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
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Independence, Missouri 64050
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WITNESSES:

DET Steven Breshears , 223 N. Memorial Drive, Independence, MO 64050
Whitney Gray , , ,

PROBABLE CAUSE STATEMENT

Date: 10/17/2016

Report #: 16-78951

I, Steve Breshears, a Detective with the Independence, 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 10/16/2016, at 1938 hours, Christopher P. Taylor, (Race- W, Sex- M, DOB- 08/06/1977, Address-11404 E Sheley Rd. Independence, MO 64052, SSN- [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 10/16/16 around 1940 hours Officer Brett Schmidli, Officer Mike Turk, Sgt. Joe Christiansen, and Officer Dustin Rapp were dispatched to 1605 S Sterling in regard to an aggravated assault.

Upon arrival Officer Rapp observed Fire personnel attempting to treat a female patient, later identified as Ms. Whitney Gray, who was lying near a Silver Chevrolet Venture Mini Van. Officer Rapp observed that the Chevrolet Venture minivan was pulled diagonally into the driveway of 1605 S Sterling. The Chevrolet Mini Van had Missouri license plate KK3-V6M. The Chevrolet minivan was facing northeast. Officer Rapp observed that Ms. Gray was laying face up and her head was facing to the South. Ms. Gray was on the driver's side of the Chevrolet minivan. Officer Rapp observed that Ms. Gray was unresponsive and had blood on her chest and face. AMR arrived on scene and began to treat Ms. Gray.

Officer Brett Schmidli arrived on the scene and observed several people standing over Ms. Gray, who was covered in blood around her chest and head and who was laying on the sidewalk by a Chevrolet Venture minivan. Officer Schmidli observed a gunshot wound on the female's chest (just below the neck around her collar bone area, on the upper right hand side of her chest). Officer Schmidli also observed there was a large amount of blood on the female's shirt. Officer Schmidli immediately began lifesaving measures along with Officer Turk. Independence Fire and American Medical Response (AMR) paramedics took over life saving measures but advised the female had no pulse.

Officer Schmidli also determined there were three other juveniles inside the van with Ms. Gray: JF, w/f, 1/25/2000; BR, w/m, 6/23/15 and FT, w/m, 5/23/13. They had no apparent injuries.

It was later determined that Ms. Gray suffered a single gunshot to the chest while driving her minivan north on Sterling Ave. from the intersection of Winner Rd. Ms. Gray was shot by defendant Christopher P. Taylor from his moving vehicle in an apparent fit of road rage. Ms. Gray was pronounced deceased at the scene. On 10/17/16 Deputy Jackson County Medical Examiner, Marius Tarau, M.D. examined and performed an autopsy on Ms. Gray and reported her cause of death was a gunshot wound to the chest and the manner of death was homicide.

Multiple witnesses reported they observed what appeared to be a road rage incident starting at the intersection of NB Sterling Ave. and 23rd St. It was reported Ms. Gray was driving her van north on Sterling from the inside lane and Mr. Taylor was following her in his white 2004 Toyota Sequoia SUV. Witnesses said Mr. Taylor was tailgating Ms. Gray as they proceeded north. It was reported he passed her on the right so close as to almost cause a wreck. Witnesses said both vehicles continued north to a red signal at Winner Rd. where Ms. Gray was in the left turn lane and Mr. Taylor was in the lane on her right to continue north. Witnesses said they saw a drink or liquid thrown from Ms. Gray's front passenger window onto Mr. Taylor's SUV. It was reported that just after the liquid was thrown the SUV moved forward in the intersection and witnesses heard a loud "pop" they thought was a gun shot. Both vehicles then travelled north on Sterling with Ms. Gray's van coming to a stop at 1605 S Sterling Ave with Mr. Taylor continuing on north.

Detective Brian Draveling recovered surveillance video of Ms. Gray shopping at 2301 S Sterling Ave., Price Chopper grocery store prior to the shooting on 10/16/16. She was observed shopping without incident and then loading groceries and leaving the store in her silver minivan at 1936 hours. Ms. Gray is seen turning north out of the Price Chopper Parking lot and stopping for the signal and cross traffic at 23rd St. As soon as she turns out of the lot a large white SUV was observed driving into frame from south to north at a high rate of speed and stopping behind Ms. Gray. Detective Draveling observed the white SUV appeared to be a Toyota.

Detective Draveling recovered surveillance video from 11020 E 23rd St., Taco Bell. This footage depicted Ms. Gray's silver minivan travelling north on Sterling Ave. from 23rd St. and the large white SUV following close behind until both vehicles drive out of frame.

In an effort to locate and identify the white SUV vehicle prior to its appearance behind Ms. Gray's minivan after she departed Price Chopper, Detective Draveling recovered surveillance video from 11101 E US 40 Hwy., QuikTrip, from 10/16/16. Around 1929 hours a white Toyota Sequoia bearing MO license HM8N9S, is observed pulling into the QT lot from the Sterling Ave entrance and parking. Around 1930 hours a white male exits the driver's seat of the Sequoia and enters the store, buys nothing then exits and walks back to the Sequoia. Around 1931 hours the white male subject enters the driver's door of the Sequoia and appears to be the only subject in the vehicle. Around 1932 hours the white Toyota Sequoia leaves the east parking exit onto NB Sterling Ave. and quickly accelerated NB across US 40 Hwy. There were images recorded of this male subject while he was inside QT. A computer check of the MO license HM8N9S revealed it was registered to Christopher Taylor on a 2004 Toyota Sequoia. Detective Draveling believed the vehicle observed at QT was the same vehicle observed from surveillance at Price Chopper and Taco Bell.

On 10/17/16 Detective Draveling and Detective Breshears interviewed James R. Taylor, who was Christopher Taylor's father. J. Taylor described Christopher as a loner that was paranoid of the government and made every effort to "stay off the grid". J. Taylor said he watched the 0500 hour KMBC channel 9 news on 10/17/16 and saw the news story regarding a homicide in Independence, MO. He said the image the news broadcast of the suspect vehicle. (Provided to media by police from the Taco Bell surveillance) looked like Christopher Taylor's white 2004 Toyota Sequoia. He said he also realized the incident reported was near his son's neighborhood. J. Taylor said he began worrying Christopher was involved so he called him. He said the phone went straight to voicemail, which was unusual. J. Taylor said he called Christopher's mother, Rebecca Crenshaw, and told her of the news story and his suspicions. He said she also called Christopher but it went straight to voicemail. J. Taylor said Christopher's boss, James Luke, said he was a no call, no show for work which was uncharacteristic. James Luke said he also tried calling Christopher but it went to voicemail. J. Taylor said it was out of character and highly unusual for Christopher to not answer his phone, call back or not show up for work.

J. Taylor said he went to 11404 E Sheley Rd, Christopher's residence, around 1200 on 10/17/16. He said Chris's Toyota Sequoia was not there. He said he was worried about Christopher's well being so the landlord let him inside. J. Taylor said the following items appeared to be missing from Christopher's residence:

- Clothing
- Camping Gear
- Assault Style Rifle
- Hand Gun (.40 cal)
- Ammunition
- (4) \$50 Gold Pieces
- 100 ounces of Silver
- Taylor Acoustic Guitar

J. Taylor said he immediately became more suspicious that Christopher was involved in the road rage homicide reported on the news because it appeared as though he had packed and taken things to run away. J. Taylor again described his son as a loner and did not know where he would have gone. J. Taylor said Christopher purchased his Toyota Sequoia from Instant Auto in Lee's Summit, MO.

On 10/17/16 around 1830 hours Detective Breshears contacted collections manager, Dee Harper, from Instant Auto. She voluntarily checked her Gold Star tracking system to attempt to locate Mr. Taylor's 2004 white Toyota Sequoia via GPS. Ms. Harper located the tracking device near North Interstate 90 Rd, Box Elder, SD 57719, at LaQuinta Inn and Suites in Box Elder, SD. around 700 miles north of Independence, MO. Instant Auto provided law enforcement login credentials to monitor the GPS location of their vehicle and to advise them if it is recovered.

Detective Steve Breshears



Print Name

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge