

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

Police# 15-071381
Prosecutor# 095435494
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Rachel N. Ryce
3603 SW McDaniel Ave.
Blue Springs, MO 64015
DOB: 12/23/1987; Race/Sex: B/F;
SS# [REDACTED]
Defendant.

Count I. Murder in the Second Degree - Felony Murder - during perpetration/attempted perpetration/flight from perpetration of a felony, a person dies (565.021-001Y19840999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Rachel N. Ryce**, in violation of Section 565.021, RSMo, either acting alone or purposefully in concert with another 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 4, 2015, in the County of Jackson, State of Missouri, Anthony Johnson was killed by being shot as a result of the attempted perpetration of the class A felony of robbery in the first degree under Section 569.020, RSMo. committed by the defendant on or about October 4, 2015 in the County of Jackson, State of Missouri.

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, **Rachel N. Ryce**, in violation of Section 571.015, RSMo, either acting alone or purposefully in concert with another committed the **Felony of Armed Criminal Action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about October 4, 2015, 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.

Count III. Robbery in the First degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Rachel N. Ryce**, in violation of Section 569.020, RSMo, either acting alone or purposefully in concert with another committed the **Class A Felony of Robbery in the First degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 4, 2015, in the County of Jackson, State of Missouri, the defendant forcibly stole an Apple iMac computer and a PlayStation 3 in the possession of [REDACTED], and in the course thereof Joshua T. Nesbitt, another participant in the crime was armed with a deadly weapon.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count IV. 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, **Rachel N. Ryce**, in violation of Section 571.015, RSMo, either acting alone or purposefully in concert with another committed the **Felony of Armed Criminal Action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about October 4, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First 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.

Rachel N. Ryce

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Sydney Paquette (#56888)
Assistant Prosecuting Attorney
415 E. 12th St., Floor 7M
Kansas City, Missouri 64106
(816) 881-3111
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WITNESSES:

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

PROBABLE CAUSE STATEMENT FORM

Date: 10-11-2016

CRN: 15-71381

I, Det. Leland Blank #5023

(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 10-04-2015, at 8338 Hillcrest #B in
(Date) (Address)

Kansas City, Jackson Missouri Rachel N. Ryce B/F 12-23-1987
(County) (Name of Offender(s))

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

Murder
Felony Murder,
Robbery

The facts supporting this belief are as follows:

On 10-04-2015 at 8:15 p.m., Officers from the Kansas City, Missouri Police Department were dispatched to 8338 Hillcrest Apartment B, Kansas City, Jackson County, Missouri, on a reported shooting. Officers had previously been dispatched to the apartment complex at approximately 4:15 p.m. on a sound of shots call. An area canvass completed at the time revealed no incident or crime scene that could be located with the information provided by the 911 callers. When dispatched the second time Officers discovered the victim shot and deceased on the couch. The victim's family had discovered the victim and called Police. Family members stated an Apple Mac computer and a PlayStation 3 game console had been taken from the apartment. The victim had been staying at the residence for approximately two weeks with the renter of the apartment. The victim had been associating with parties in an upstairs apartment.

Review of the crime scene revealed the victim to be shot in the head and side. Multiple .223 rifle shell casings were found near the victim.

Neighbors were contacted who stated at approximately 4:15 p.m., they had heard approximately five shots and observed one black male in a red hoodie and two black females running from the area of the apartment. The male and females ran to a trail in the woods behind the apartment that led up a hill to another parking lot within the same apartment complex. The 911 callers advised dispatch that they did not want to be contacted by officers.

On 10-07-2015, officers conducted a car check at 53rd and Olive on a red Chevrolet HHR. During a search of vehicle prior to towing an AR-15 rifle was found in the vehicle which is known to fire .223 rounds. One of the occupants of the vehicle was Autry Hines. The gun was tested by Kansas City Crime Lab personnel and found to be the same gun used during the homicide.

During the investigation a party came forward who knew Autry Hines' girlfriend. She stated Hines' girlfriend told her Hines had been present during the murder of the victim. Joshua Nesbitt, two females, and Hines had robbed the victim and Nesbitt shot the victim.

On 10-16-2015, Hines was interviewed by detectives. After waving his Miranda Rights, Hines admitted to being present for the homicide. Hines stated he was in the apartment located at 8338 Hillcrest Apartment B Kansas City, Jackson County, MO, which is above the victim's apartment. Hines was with Joshua Nesbitt, a

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female named Rachel, another female named Nickayla, and Joslyn Lee. Hines advised he had arrived at the apartment in the red Chevrolet HHR. Everyone in the apartment was talking about robbing the victim. Nesbitt stated, "I'm not gonna rob somebody and let them live". Nesbitt, Hines, and Nickayla went downstairs and Nesbitt had a black assault rifle. Nesbitt was wearing a red hoodie. Nesbitt knocked on the door and the victim answered. Nesbitt made the victim sit on the couch and held the gun on him. Nickayla went through victim's pockets and took the PlayStation 3 from the living room. Hines took the Mac computer. As the group was leaving the apartment Nesbitt shot the victim several times in his side and then walked closer to the victim and shot him in the head. Hines stated they ran up the hill through the woods away from the apartment on a trail to where the HHR was parked.. Joslyn Lee was driving the vehicle and Rachel was in the passenger seat. They got into the vehicle and drove to Hines' residence, 7500 E. 85th Terrace #104, Kansas City, Jackson County, Missouri.

Police databases revealed Nickayla to be Nickayla B. Jones B/F 07-29-1995

A Stop Order was issued for Jones and on 10-20-2015 Jones was arrested. On 10-21-2015 Jones was transported to police headquarters for questioning. Jones waived her Miranda Rights and stated the following: On 10-04-2015 Jones was at the Stone Haven Apartment complex inside 8338 Hillcrest apartment C. Inside the apartment with her was Autry Hines, Joshua Nesbitt, Joslyn Lee, and Rachel Ryce. While inside the apartment the group planned to go to the apartment down stairs, 8338 Hillcrest apartment B and rob the victim who was inside the apartment. Jones advised that Nesbitt, Hines, and she walked to the downstairs apartment wearing latex gloves. Jones also stated Hines was carrying an assault rifle. When they arrived downstairs Jones advised that Hines and she stood off to the side of the apartment door while Nesbitt knocked on the victim's door. When the victim answered Nesbitt pushed his way in and Hines and she followed. Once in the apartment Hines gave the assault rifle to Jones while Nesbitt and Hines went through the apartment looking for stuff. Nesbitt returned to Jones and took the assault rifle still making the victim sit on the couch. While Nesbitt and the victim argued Jones stated that she took an Apple Mac computer, marijuana, and a cell phone. They started to leave the apartment when Jones watches Nesbitt shoot the victim multiple times with the assault rifle. After the shooting the three of them run out of the apartment and up a hill to a car that was waiting for them. Jones advised that Rachel and Joslyn were waiting in the car and Joslyn was driving. All five subjects then left the area in the vehicle.

Jones was interviewed again on 06-29-2016. She stated Ryce was aware the robbery was going to happen and had been in contact with the victim through instant messages on Facebook. Before the robbery Nesbitt had gone downstairs and knocked on the victim's door to see if he was home. The victim did not answer the door so Nesbitt returned to the apartment and instructed Ryce to message the victim to keep him in his apartment downstairs. Ryce asked where the victim was at and the victim told her he was at home. Ryce then told the victim she was going to take a shower and head down to see him. Ryce then told Nesbitt the victim was in his apartment. Ryce did not take a shower and the robbery occurred after Ryce had located the victim at home for Nesbitt.

A Stop Order was issued for [REDACTED] and on 10-20-2015 [REDACTED] was arrested. On 10-21-2015 [REDACTED] was transported to police headquarters for questioning. [REDACTED] waived her Miranda Rights and stated the following: On 10-04-2015 [REDACTED] was at the Stone Haven Apartment complex inside her apartment 8338 Hillcrest apartment C, Kansas City, Jackson County, Missouri. Inside the apartment with her was Autry Hines, Joshua Nesbitt, Nickayla Jones and Rachel Ryce. While inside the apartment the group planned to go to the apartment down stairs, 8338 Hillcrest apartment B and rob the victim who was inside the apartment. Prior to the robbery occurring [REDACTED] stated that all five of them responded to a local store. While there Joshua Nesbitt told [REDACTED] to get

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some gloves to use during the robbery. [REDACTED] advised that because of that conversation she stole a box of latex gloves so they could use them. The group returned to the apartment at which time Joshua Nesbitt again went over the plan to rob the victim. [REDACTED] stated that her job was to drive the getaway vehicle while Ryce waited in the vehicle with her. [REDACTED] further advised that Jones, Hines, and Nesbitt were going to go in the apartment during the robbery. Prior to the robbery occurring [REDACTED] responded to the vehicle they were going to use which had been parked in another parking lot up a hill from the victim's apartment obscured by a wooded area. While waiting in the vehicle [REDACTED] heard multiple gunshots and then a short time later observed Jones, Hines, and Nesbitt return to the vehicle. One of the three had a large black garbage bag in their hand that they placed in the back of the vehicle. [REDACTED] then drove them out of the area.

On 06-01-2016, [REDACTED] was again interviewed. [REDACTED] stated Nesbitt went downstairs to check to see if the victim was home and discovered he was not. Nesbitt told Ryce to instant message the victim on Facebook to see when the victim was coming back to the house and to see if the victim was downstairs. Ryce knew there was going to be a robbery and knew she was contacting the victim for Nesbitt to locate him for the robbery. Once Ryce established the victim was downstairs by himself, Nesbitt started the plan in motion to rob the victim.

A Stop Order was issued for Ryce and on 10-20-2015 Ryce was arrested. After waving her Miranda Rights, Ryce stated the following: Ryce was at the Stone Haven Apartment complex inside 8338 Hillcrest apartment C on 10-04-2015. Inside the apartment with her was Autry Hines, Joslyn Lee, Nickayla Jones, and a black male she knew as "T". Lee and "T" planned to rob the victim who was downstairs. The witness and Lee then went to a red Chevy HHR in the parking lot and Lee drove the vehicle around to a parking lot to the south of the victim's apartment which was obstructed by trees. She was in the passenger seat of the vehicle when she heard five shots. About a minute later, Jones, Hines, and "T" came running to the car from a trail in the trees. Hines had an assault rifle in this hand and they got into the vehicle. They left the area with Lee driving. Ryce stated she had been talking to the victim on the Facebook before the robbery about the victim coming upstairs to "smoke". A search warrant was obtained for Ryce's Facebook records. The records showed the victim and Ryce became Facebook friends on 10-03-2015 at 7:54 a.m. and had an ongoing conversation about meeting up with each other. The victim indicated he did not want to come up to Ryce's apartment and wanted Ryce to come downstairs to his apartment. At 1:55 p.m. on 10-04-2015 the victim messaged Ryce and Ryce asked the victim where he was. The victim messaged he was at home and Ryce told him she was going to take a shower and head his way. The victim messaged back "Ok" at 2:46 p.m. and the records showed no other messages between Ryce and the victim.

Printed Name Det. Leland Blank #5023

Signature



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

Judge

Circuit Court of _____ County, State of Missouri.

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

Police# 15-071381
Prosecutor# 095435491
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Shawn L. Burkhalter
2310 Jackson
Kansas City, MO 64131
DOB: 10/03/1988; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Murder in the Second degree - Felony Murder - during perpetration/attempted perpetration/flight from perpetration of a felony, a person dies (565.021-001Y19840999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Shawn L. Burkhalter**, in violation of Section 565.021, RSMo, either acting alone or purposefully in concert with another 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 4, 2015, in the County of Jackson, State of Missouri, Anthony Johnson was killed by being shot as a result of the attempted perpetration of the class A felony of robbery in the first degree under Section 569.020, RSMo. committed by the defendant on or about October 4, 2015 in the County of Jackson, State of Missouri.

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, **Shawn L. Burkhalter**, in violation of Section 571.015, RSMo, either acting alone or purposefully in concert with another committed the **Felony of Armed Criminal Action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about October 4, 2015, 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.

Count III. Robbery in the First degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Shawn L. Burkhalter**, in violation of Section 569.020, RSMo, either acting alone or purposefully in concert with another committed the **Class A Felony of Robbery in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 4, 2015, in the County of Jackson, State of Missouri, the defendant forcibly stole an Apple iMac computer and a PlayStation 3 in the possession of Anthony Johnson, and in the course thereof Joshua T. Nesbitt, another participant in the crime was armed with a deadly weapon.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count IV. 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, **Shawn L. Burkhalter**, in violation of Section 571.015, RSMo, either acting alone or purposefully in concert with another committed the **Felony of Armed Criminal Action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about October 4, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First 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.

Shawn L. Burkhalter

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Sydney Paquette (#56888)
Assistant Prosecuting Attorney
415 E. 12th St., Floor 7M
Kansas City, Missouri 64106
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WITNESSES:

DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106
DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106
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PO Christopher J. Onik, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 10-11-2016

CRN: 15-71381

I, Det. Leland Blank #5023

(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 10-04-2015, at 8338 Hillcrest #B in
(Date) (Address)

Kansas City, Jackson Missouri Shawn L Burkhalter
(County) (Name of Offender(s))

SSN:495-98-5798 committed one or more criminal offense(s).
(Description of Identity)

Murder
Robbery

The facts supporting this belief are as follows:

On 10-04-2015 at 8:15 p.m., Officers from the Kansas City, Missouri Police Department were dispatched to 8338 Hillcrest Apartment B, Kansas City, Jackson County, Missouri, on a reported shooting. Officers had previously been dispatched to the apartment complex at approximately 4:15 p.m. on a sound of shots call. An area canvass completed at the time revealed no incident or crime scene that could be located with the information provided by the 911 callers. When dispatched the second time Officers discovered the victim shot and deceased on the couch. The victim's family had discovered the victim and called Police. Family members stated an Apple Mac computer and a PlayStation 3 game console had been taken from the apartment. The victim had been staying at the residence for approximately two weeks with the renter of the apartment. The victim had been associating with parties in an upstairs apartment.

Review of the crime scene revealed the victim to be shot in the head and side. Multiple .223 rifle shell casings were found near the victim.

Neighbors were contacted who stated at approximately 4:15 p.m., they had heard approximately five shots and observed one black male in a red hoodie and two black females running from the area of the apartment. The male and females ran to a trail in the woods behind the apartment that led up a hill to another parking lot within the same apartment complex. The 911 callers advised dispatch that they did not want to be contacted by officers.

Family members of the victim and the victim's roommate indicated the victim had been communicating with some upstairs neighbors before the homicide. They would call the victim by the moniker of "Ant". The victim's cousin stated he knew the parties and was concerned about the victim living below them. He knew two of the male parties to be Shawn Burkhalter and Joshua T Nesbitt. Nesbitt was known to go by the moniker "T". Burkhalter was also considered a family member he was so close to the victim's family.

On 09-10-15, a homicide occurred in Raytown, Missouri in the area of 66th and Raytown Road. After the homicide, Raytown detectives received an anonymous tip indicating Burkhalter and Nesbitt were involved in the Raytown homicide.

A Kansas City, Missouri Police Officer contacted detectives and stated before the victim's homicide the victim had approached him and stated he wanted to provide information about who was involved in the Raytown murder. The officer advised him to contact the TIPS hotline. The officer later contacted the victim by

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phone and the victim told him he had called in a tip. The victim also spoke with a Kansas City detective and the victim told the detective he had overheard Burkhalter and Nesbitt discussing having committed the Raytown homicide. On 10-02-2015, Burkhalter was arrested and spoke with Raytown detectives in regard to the tip they had received. Burkhalter remained in custody for a parole violation.

Detectives listened to Burkhalter's recorded jail phone calls for the day of the homicide. On 10-04-15 at approximately 9:13 a.m., Burkhalter called his girlfriend Joslyn Lee. Burkhalter asks Lee if "T" was there and Lee stated T was present. They also discussed that "Ant" was around the apartment and had come upstairs to their apartment. Burkhalter talks to Nickayla Jones and Rachel Ryce on the phone and tells them not invite the victim into the apartment. A male gets on the phone (the male is believed to be Nesbitt) and they discuss what Raytown detectives had questioned Burkhalter about. The male tells Burkhalter that someone had communicated to Burkhalter's child's mother, that Burkhalter's cousin Ant had turned him in to the police. Burkhalter tells the male to "go down there real quick" and "take everything". The male responded, "Alright say no more". At 9:44 a.m., Burkhalter again makes phone contact with Joslyn Lee. Lee told Burkhalter, "They about to go downstairs". Burkhalter asked if it was T going downstairs and Lee stated T was, Burkhalter stated "They don't need to worry about nothing down there". At 9:57 a.m., Burkhalter called an unknown female and told the female he was set up by Ant on 10-02-2015 when Burkhalter had been arrested. He stated Ant had told the police and received a reward. He described Ant as Tank's cousin. It should be noted the victim had a cousin with a moniker of "Tank". At 10:16 a.m., Burkhalter again makes phone contact with Lee and she tells him Ant is not downstairs. She then stated, "He is waiting on Ant to get back".

At 10:09 p.m. (after the victim had been discovered) Burkhalter called Lee and asked if everyone was OK at the apartment and asked, "Who got smoked over there?", Lee stated, "Huh?" and Burkhalter stated, "You don't wanna answer so I know". Lee stated, "Yeah...yep." Burkhalter stated, "tell that nigger bro tell that nigger man oh my momma be safe bro". Burkhalter asks if it is "Ant" and Lee stated "yeah" and Burkhalter began loudly laughing and Burkhalter stated, "You gotta be kidding me..on my momma...salute that". Burkhalter then asked Lee about "G", Lee seemed confused and asked "T?". Burkhalter loudly asked about "G" again, Lee stated he was with "Rica" and that he was "hyped". At 10:37 p.m., Burkhalter made phone contact with "T" and they talk about how the "bitch" downstairs was dead.

On 10-07-2015, officers conducted a car check at 53rd and Olive on a red Chevrolet HHR. During a search of vehicle prior to towing, an AR-15 rifle was found in the vehicle which is known to fire .223 rounds. One of the occupants of the vehicle was Autry Hines. The gun was tested by Kansas City Crime Lab personnel and found to be the same gun used during the homicide and the Raytown homicide.

During Burkhalter's recorded jail phone calls he was told by Lee about the AR-15 having been recovered by police. Burkhalter became panicked and over multiple phone calls instructed Lee on how to try and find the gun. He told Lee, "Everyone is gonna pay if this shit ain't found" and "Your life is on the line".

A search of pawn shop records in the Kansas City area after the homicide showed one Mac computer to have been pawned at Cash America Pawn, 6234 Paseo, Kansas City, Jackson County, Missouri on 10-6-2015 by a female. Detectives responded to the shop where they turned on the Mac computer. When the computer was turned on they observed logins previously given by the victim's family as being on the computer. The logins were for the victim's sister and the victim's mother. Video was obtained from the shop and showed the female in the shop with a black male. The male was later identified as Joshua Nesbitt (AKA "T").

Another search was completed for PlayStation 3's pawned at the same pawn shop and one was shown to have been pawned by a different female. The female was found to be as associate of the female who had

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pawned the Mac. Detectives again responded to the pawn shop and turned on the PlayStation 3. The main login for the console was found to belong to the prior owner of the PlayStation 3.

The female who pawned the PlayStation 3 stated she was the sister of the female who pawned the Mac. After being shown surveillance photos she identified Nesbitt as being with her sister when the Mac was pawned. She stated on 10-4-2015 at around 5 p.m., she received a phone call from Nesbitt who told her he needed to come to her residence in Kansas City. Nesbitt was dropped off at her house by an unknown party. Nesbitt told her he had killed the victim. Nesbitt told her he had also burned his clothes and got rid of the gun. On 10-5-2015 Nesbitt told her to pawn the Playstation 3 and she did at 6234 Paseo. On 10-6-2015 Nesbitt told her sister to pawn the Mac. Nesbitt and her sister went and pawned the Mac at 6234 Paseo. The money from the pawned items was given to Nesbitt.

During the investigation a party came forward who knew Autry Hines' girlfriend. She stated Hines' girlfriend told her Hines had been present during the murder of the victim. Joshua Nesbitt, two females, and Hines had robbed the victim and Nesbitt shot the victim.

Hines' girlfriend was interviewed and stated she had been at work in Lee's Summit, Missouri when Joslyn Lee showed up with Nesbitt, a female named Nickayla Jones, and the witness. This occurred after Hines had been arrested with the AR-15. Lee gave the phone to Hines' girlfriend and Burkhalter was on the phone. Burkhalter told her if they could not find Hines then she would be responsible. Detectives located the recorded phone call and Burkhalter can be heard telling Hines' girlfriend he would, "Tell brother to pull the plug on everybody", and would have her, "taken out right now". Burkhalter also tells her she would have to pay for the missing item, "and I don't mean money".

On 10-16-2015, Hines was interviewed by detectives. After waving his Miranda Rights, Hines admitted to being present for the homicide. Hines stated he was in the apartment located at 8338 Hillcrest Apartment B Kansas City, Jackson County, MO, which is above the victim's apartment. Hines was with Joshua Nesbitt, a female named Nickayla, Joslyn Lee, and the witness. Hines advised he had arrived at the apartment in the red Chevrolet HHR. Everyone in the apartment was talking about robbing the victim. Nesbitt stated, "I'm not gonna rob somebody and let them live". Nesbitt, Hines, and Nickayla went downstairs and Nesbitt had a black assault rifle. Nesbitt was wearing a red hoodie. Nesbitt knocked on the door and the victim answered. Nesbitt made the victim sit on the couch and held the gun on him. Nickayla went through victim's pockets and took the PlayStation 3 from the living room. Hines took the Mac computer. As the group was leaving the apartment Nesbitt shot the victim several times in his side and then walked closer to the victim and shot him in the head. Hines stated they ran up the hill through the woods away from the apartment on a trail to where the HHR was parked. Joslyn Lee was driving the vehicle and the witness was in the passenger seat. They got into the vehicle and drove to Hines' residence, 7500 E. 85th Terrace #104, Kansas City, Jackson County, Missouri. Nesbitt hid the rifle in his apartment and Nesbitt later left. Hines put the rifle back into the HHR. He was trying to get rid of it when he was pulled over and arrested in the HHR.

A Stop Order was issued for Nickayla Jones and on 10-20-2015 Jones was arrested. On 10-21-2015 Jones was transported to police headquarters for questioning. Jones waived her Miranda Rights and stated the following: On 10-04-2015 Jones was at the Stone Haven Apartment complex inside 8338 Hillcrest apartment C. Inside the apartment with her was Autry Hines, Joshua Nesbitt, Joslyn Lee, and the witness. While inside the apartment the group planned to go to the apartment downstairs, 8338 Hillcrest apartment B and rob the victim who was inside the apartment. Burkhalter had phone contact with Lee and told them to go down there to rob the victim. Jones advised that Nesbitt, Hines, and she walked to the downstairs apartment wearing latex gloves. Jones also stated Hines was carrying an assault rifle. When they arrived downstairs Jones advised that she and

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Hines stood off to the side of the apartment door while Nesbitt knocked on the victim's door. When the victim answered, Nesbitt pushed his way in and Hines and she followed. Once in the apartment Hines gave the assault rifle to Jones while Nesbitt and Hines went through the apartment looking for stuff. Nesbitt returned to Jones and took the assault rifle still making the victim sit on the couch. While Nesbitt and the victim argued Jones stated that she took an Apple Mac computer, marijuana, and a cell phone. They started to leave the apartment when Jones watches Nesbitt shoot the victim multiple times with the assault rifle. After the shooting the three of them run out of the apartment and up a hill to a car that was waiting for them. Jones advised that the witness and Lee were waiting in the car and Lee was driving. All five subjects then left the area in the vehicle and drove to Hines apartment. Nesbitt and Hines burned the latex gloves in the toilet at the apartment. After the homicide Burkhalter told Jones she and her loved ones were going to die if she did not find the gun used in the homicide. Burkhalter told her she would be shot in the head.

Jones was interviewed again on 06-29-2016. Jones stated Burkhalter was behind the robbery of the victim. Burkhalter told Nesbitt to bring the victim upstairs and Nesbitt discovered the victim was not at home and told Burkhalter. Burkhalter called back and told them to "go downstairs and take everything" and she knew that meant to rob the victim. Lee also relayed directions from Burkhalter. After the homicide, Burkhalter had talked to the victim's cousin, Marcus Johnson on the phone. Burkhalter had talked to Marcus Johnson in an attempt to insure him that Nesbitt had nothing to do with the homicide. Even though Burkhalter was in custody at the time of the homicide he was the leader of the group and everyone followed his directions including Nesbitt.

A Stop Order was issued for Ryce and on 10-20-2015 Ryce was arrested. After waving her Miranda Rights, Ryce stated the following: Ryce was at the Stone Haven Apartment complex inside 8338 Hillcrest apartment C on 10-04-2015. Inside the apartment with her was Autry Hines, Joslyn Lee, Nickayla Jones, and a black male she knew as "T". Lee and "T" planned to rob the victim who was downstairs. The witness and Lee then went to a red Chevy HHR in the parking lot and Lee drove the vehicle around to a parking lot to the south of the victim's apartment which was obstructed by trees. She was in the passenger seat of the vehicle when she heard five shots. About a minute later, Jones, Hines, and "T" came running to the car from a trail in the trees. Hines had an assault rifle in this hand and they got into the vehicle. They left the area with Lee driving.

A Stop Order was issued for [REDACTED] on 10-20-2015 [REDACTED] was arrested. On 10-21-2015 [REDACTED] was transported to police headquarters for questioning. [REDACTED] waived her Miranda Rights and [REDACTED] admitted to her involvement in the murder. During the interview [REDACTED] was asked if Burkhalter had threatened her or anyone else after the murder. [REDACTED] stated, "Shawn is a threat".

On 06-01-2016, [REDACTED] was again interviewed. [REDACTED] stated Burkhalter had threatened to kill her multiple times if she did not get the murder weapon back from Hines. She stated the AR-15 belonged to Burkhalter and he would carry around with him at all times. Burkhalter had gotten the gun during a robbery in Lawrence, KS, a month prior to the homicides. Burkhalter knew the AR-15 had been used in the homicide and was happy the victim had been killed.

On 02-17-2016, Burkhalter was interviewed while in custody for other charges at the Western Reception Diagnostic Correctional Center in St. Joseph, Missouri. After waiving his Miranda Rights, Burkhalter denied any involvement in the victim's murder. He stated the victim was like family to him and he had known the victim for a long time. He denied ever being in possession of the AR-15 used to kill the victim and denied directing anyone involved in the case after the murder to cover up evidence. He also stated he did not discuss the Raytown murder with the victim prior to Burkhalter being arrested. Burkhalter stated he heard a rumor a

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few months after the victim's murder that the victim had told Raytown police Burkhalter was involved in the Raytown homicide.

Printed Name Det. Leland Blank #5023

Signature

Det. Leland Blank #5023

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

Judge

Circuit Court of _____ County, State of Missouri.