

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

POLICE NO. :	15-027248
PROSECUTOR NO. :	095437621

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
DERIUS TAYLOR	)	
7401 E 87th St,	)	CASE NO. 1716-CR
Kansas City, MO - 64138	)	DIVISION
DOB: 07/31/1988	)	
Race/Sex: B/M;	)	
SSN: [REDACTED]	)	
DEFENDANT.	)	

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840904.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **Class A Felony of Murder in the First Degree**, punishable upon conviction under Section 565.020, RSMo, in that on or about April 23, 2015, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Dominique Stafford by shooting him.

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 on or about April 23, 2015, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder 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 Murder in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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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.

Count III. Robbery 1st Degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the **Class A Felony of Robbery in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 23, 2015, in the County of Jackson, State of Missouri, the defendant forcibly stole a necklace in the possession of Dominique Stafford, and in the course thereof the defendant 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.

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.

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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Ashleigh A. Ragner
Ashleigh A. Ragner (#63694)
Assistant Prosecuting Attorney
415 E. 12th St. 11th Floor
Kansas City, MO - 64106
(816) 881-3555
ARagner@jacksongov.org

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WITNESSES:

DET Daniel W. Frazier, 1125 Locust, Kansas City, MO - 64106

PO Jacob Harris, 1125 Locust, Kansas City, MO - 64106

DET Leland Blank, 1125 Locust, Kansas City, MO - 64106

DET Mark Spiegel, 1125 Locust, Kansas City, MO - 64106

DET Kristofer Oldham, 1125 Locust, Kansas City, MO - 64106

DET Ray Lenoir, 1125 Locust, Kansas City, MO - 64106

DET Wayne Fitzner, 1125 Locust, Kansas City, MO - 64106

Sgt. Barbara Eckert, 1125 Locust, Kansas City, MO – 64106



PROBABLE CAUSE STATEMENT FORM

Date: 02-06-2017

CRN: 15-27248

I, Detective Daniel W. Frazier #5180, Kansas City Missouri Police Department

(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 04-23-2015, at 37th Ter and Elmwood in
(Date) (Address)

Kansas City, Jackson County Missouri Derius Taylor B/M 07-31-1988
(County) (Name of Offender(s))

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

The facts supporting this belief are as follows:

On 04-23-15, at approximately 0701 hours, Officers with the Kansas City Missouri Police Department were dispatched to 37th and Elmwood, Kansas City, Jackson County, Missouri on a reported unknown party slumped over in a white car with blood visible on the driver's door.

Upon arrival responding Officers located the victim in the vehicle deceased, suffering from apparent gunshot wounds.

Investigation at the scene revealed the victim to be shot twice. The victim was slumped over into the passenger seat appearing to have been sitting in the driver's seat. Both of the victim's front pockets were pulled completely out and there were no keys to the vehicle. Apparent blood smears were found on the outside of the vehicle along the driver's door and passenger door.

Detectives contacted family members who stated that the victim rode around with an AK- assault rifle with him in the car at all times. The victim was also known to have money in his pockets and a cell phone. The evening before the victim was found, he had been with friends and they had observed him to be wearing a large unique chain with a diamond encrusted pendant. The chain and pendant was gold in color and was a circle with the letters DOR in the center. This pendent is one given to people who sign with the record label Duced Out Records and is one of approximately six and is inscribed with "T Nine". Friends also indicated that the victim was known to sell drugs which he would have kept in the center console. None of the above items were found in the vehicle or with the victim.

The body exam completed by the Jackson County Medical Examiner revealed that they found the victim to have a through and through bullet wound to his neck that entered from the right side and exited the left side. The victim also had a single entrance bullet wound to his right temple with a significant amount of stippling around it which the Medical Examiner stated indicated a shot from close proximity.

Family provided an active phone number for the victim for which a Court Order was obtained for in an attempt to get call logs and location information. At the time of service of the court order the victim's cell phone appeared to be turned off. Call logs revealed the victim's last phone call to be outgoing to a telephone number 816-255-9290 which lasted for 271 seconds on 04-23-2015 at 0044 hrs. The victim's cell phone appeared to be shut off within 15 minutes of that call and no additional outgoing calls were made and all incoming calls were routed to voicemail. Additional review of the victim's call logs further revealed the victim to have eight incoming and outgoing calls to and from the same telephone number between 04-22-2015

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/2237 hrs and 04-23-2015/0044 hrs. The 816-255-9290 telephone number did not appear earlier on the call logs nor did the number appear after the phone stopped receiving calls as a missed call.

On 05-04-2015 a court order was obtained for the telephone number 816-255-9290. It was revealed through the cell phone company records that the telephone number was shut off the day the murder occurred (04-23-2015) and a new phone number of 913-206-2075 was immediately issued under the same customer name to the same device. The phone subscriber was found to be [REDACTED] who is a known girlfriend of Derius Taylor.

A review of both the victim's call logs and the 816-255-9290 telephone number call logs confirmed the back and forth conversation between the two phones on 04-22-2015 thru 04-23-2015. Additionally the subject telephone number indicated that on 04-22-2015 at 2221 hrs the subject telephone called 816-359-8983. That number was confirmed to belong to [REDACTED] who had provided his number during an interview conducted regarding this investigation. 16 minutes after the phone conversation between 816-255-9290 telephone number and Lane, the 816-255-9290 telephone number contacts the victim's cell phone for the first time. There were multiple back and forth calls between the victim and 816-255-9290 telephone with the last one being at 04-23-2015 at 0044 hrs which was also the last connected phone call to the victim's phone before call logs indicated the victim's phone was shut off and all calls began being routed to voicemail. The first routed call was at 0059 hrs. The 816-255-9290 telephone does not attempt to contact the victim's phone again and the 816-255-9290 telephone number places a call to [REDACTED] on 04-23-2015 at 0105 hrs that lasted for 113 seconds.

[REDACTED], when interviewed stated that he had no knowledge of the victim's homicide. A consent to search of his cell phone revealed no calls to or from the 816-255-9290 telephone number which was later compared with cell company call logs of 816-255-9290 and it was found that [REDACTED] had deleted all calls to the number, 816-255-9290 off his device prior to being contacted by detectives.

Pursuant to a court order search warrant obtained on 05-04-2015, officers were receiving E911 GPS location information (commonly referred to as "pings") and pen register information for the cellular telephone bearing the number 913-206-2075. On May 5, 2015, the cellular telephone was "pinging" in front of 712 Bennington Avenue, Kansas City, Jackson County, Missouri, with an "uncertainty" reading of 6 meters and had been "pinging" at that residence since 10:00 AM on May 4, 2015. Based upon that "ping," physical surveillance was established at 712 Bennington Avenue, Kansas City, Jackson County, Missouri. Officers conducting surveillance observed Derius L. Taylor, black male, born July 31, 1988, walking in and out of the residence at 712 Bennington Avenue. Officers also observed Taylor using a cellular telephone on several occasions, and radioed that information to officers who were watching the live pen register information being received for telephone number 913-206-2075. Based upon officer's physical observations of Taylor using a cellular telephone, combined with other officer's observations of the pen register information showing the cellular telephone being used at the same time, investigators believe that Taylor was currently holding and using the cellular telephone bearing the number 913-206-2075.

The address 712 Bennington showed utilities to be turned on in the name of [REDACTED].

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On 5-5-2015 Derius Taylor was seen by officers to leave the residence at 712 Bennington Avenue, enter a vehicle and drive with a second male to 6223 E. Truman Rd - National Pawn - Officers then contacted Taylor who was arrested for unrelated warrants.

Contact was made with an employee of National Pawn, 6223 E. Truman Rd. Information was obtained that Taylor had pawned jewelry on 5-1-2015 at 1341 hours and 1755 hours. The employee was able to show detectives the jewelry Taylor pawned and Detectives observed it to be the diamond encrusted pendant that was taken from the victim at the time of the homicide with the victim's name etched in the back of it "T-Nine."

On 5-5-2015 Officers contacted the male driver of the vehicle who had taken Taylor to the Pawn Shop. This male was found to be [REDACTED].

After verifying that Taylor had pawned the Diamond Encrusted Pendant that was stolen from the victim during his murder, Taylor was transported to Kansas City Police Department and held on an Investigative Hold. Taylor was transported from Municipal Jail located in Jackson County Jail to Police headquarters for questioning. Taylor was read his Miranda Warning on 05-05-2015 at 2114 hrs which he waived. During the interview Taylor advised that his current phone number was 913-206-2075 but he clarified had gotten a new number in the last week but his previous number was 816255-9290. Taylor claimed he found the Diamond Encrusted Pendant in the grass along 27th St near Chelsea Ave in pieces and turned them into the pawn shop for money. When asked about the phone calls to and from the victim's phone, Taylor stated he never called the victim and assumed that [REDACTED] likely borrowed his phone and made the calls. Detectives attempted to clarify why there would be two calls to [REDACTED] from his phone before and after the calls to the victim if it was [REDACTED] using the phone. Taylor was unable to explain and only reiterated that he never had any contact with the victim. When Detectives asked why he changed his phone number when he did, Taylor advised that his girlfriend [REDACTED] caught him talking to another female and made him change the phone number. Taylor did admit that he had seen the victim before in the 2800 and 2900 block of Myrtle Av. Where Taylor [REDACTED], and the victim were all known to hang out. Taylor provided no additional information and asked for an attorney at approximately 2243 hrs at which time the interview was concluded.

Prior to contacting Taylor, Detectives interviewed his girlfriend [REDACTED]. [REDACTED] stated Taylor and her have been having a rough time in their relationship and had not talked much over the last couple weeks. [REDACTED] confirmed Taylor had both numbers 913-206-2075 and an old number of 816-255-9290. I asked when Taylor switched his number [REDACTED] advised she was not certain but it was approximately a week and a half ago. I asked why Taylor switched phone numbers and she explained that Taylor did not offer an explanation except that he wanted a new number and just called her one day from a different number saying that it was his new number (913-206-2075). [REDACTED] also advised that she recalled a time in late April, possibly the 21st or the 22nd when Taylor came home with a white bloody shirt saying he was shot at while in a car and hit by flying glass. The shirt was unable to be located. [REDACTED] had no additional information.

On 01-20-2016 I contacted Witness #1. Witness #1 stated a black male who he knew as "Old Man" (later identified through a single photo to be Derius Taylor) called him saying he wanted to meet up with him a couple of days after the victim's homicide had occurred. The witness met up with Taylor who confessed to the witness he had killed the victim. Taylor stated to the witness that he had purposely set up a drug deal, via phone, with the victim with the intention to rob the victim of drugs, money, and a necklace the victim was known to wear. Taylor believed the victim had large sums of cash on him and that the necklace was worth

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thousands of dollars. Taylor and the victim met near a Family Dollar or Dollar General in the area of 31st and Van Brunt, Blvd in Kansas City, Jackson County, Missouri. Taylor got into the front passenger seat of the victim's vehicle. Once in the vehicle Taylor pulled out a gun and shot the victim once but then said the victim moved weird so he shot him a second time. Taylor then took the necklace the victim had and a rifle that was in the vehicle and exited the vehicle, telling the witness he never touched anything else. Taylor went back to a waiting car and somebody else who had been in the waiting vehicle came up to the victim's car and drove the victim's car away while Taylor followed them in the second vehicle. Taylor then told the witness that they dropped the vehicle off where it was found at 37th St and Elmwood because a person lived on that block that the victim had been having a "beef" with. The witness explained that Taylor never told who the second person was that was with Taylor or what kind of vehicle they may have been in. Taylor did tell the witness that he knew going into the robbery he was going to have to kill the victim because of all the items they were wanting to steal and how much money they thought they were going to be worth. The witness had no additional information.

Printed Name Det. Daniel W. Frazier #5180 Signature Det. [Signature] #5180

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

Judge

Circuit Court of _____ County, State of Missouri.