

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

Police# 15-059675
Prosecutor# 095437559
1716-CR00517
OCN# B2107646

AMENDED COMPLAINT

STATE OF MISSOURI

vs.

**Shameece S. Mosby
2008 E. 59th St.
Kansas City, MO 64132
DOB: 08/13/1991; Race/Sex: B/F;
SS# [REDACTED]
Defendant.**

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 on or about August 23, 2015, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of William Simmons by shooting him.

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 August 23, 2015, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder Second Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder 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.

Count III. Arson 2nd Degree (569.050-001Y19772099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.050, RSMo, committed the **Class C Felony of Arson in the Second Degree**, punishable upon conviction under Sections 558.011 and 558.016, RSMo, in that on or about August 23, 2015, in the county of Jackson, State of Missouri, the defendant knowingly damaged an inhabitable structure consisting of a home located at 306 Oakley Avenue, and the defendant did so by starting a fire.

The range punishment for a class C 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 seven (7) 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.

Shameece S. Mosby

/s/ Ashleigh A. Ragner

Ashleigh A. Ragner (#63694)

Assistant Prosecuting Attorney

415 E. 12th Street

Kansas City, Missouri 64106

816-881-3555

aragner@jacksongov.org

WITNESSES:

PO Kristun M. Crawford, 1125 Locust, Kansas City, MO 64106

DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106

DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106

DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106

Billie Simmons, c/o Prosecuting Atty. Office, Kansas City, MO 64106

DET Brent R. Taney, 1125 Locust, Kansas City, MO 64106

DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02-02-2017

CRN: 15-059675

I, Detective Scott Emery #4161, 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 08-23-2015, at 306 Oakley Ave in
(Date) (Address)

Kansas City, Jackson Missouri Shameece S. Mosby
(County) (Name of Offender(s))

B/F 08-13-1991, SSN: [redacted] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08-23-2015 at 0830 hours, Detectives from the Kansas City Missouri Police Department Bomb and Arson Unit responded to 306 Oakley Ave, Kansas City, Jackson County Missouri in regard to a house fire. KCFD personnel advised when they were working the house fire a deceased male victim was located inside the residence. When the Detectives and Investigators from the Jackson County Medical Examiner's Office rolled the victim over, an apparent gunshot wound was observed on the victim's forehead. The victim's death was ruled a homicide by the Jackson County Medical Examiner's Office.

During the course of the investigation, Shameece S. Mosby B/F 08-13-1991, SSN: [redacted] was contacted. Mosby stated she knew the victim for approximately 4 months and met him at the Isle of Capri Casino. Mosby referred to the victim as a "trick", stated she used him for money and other things, with the victim expecting sex in return. Mosby admitted to using the street name "Crystal". Mosby admitted to having stayed at the victim's residence but not since July 2015. Mosby admitted to having 4 bags of clothing at the victim's residence.

On 08-13-2015 the victim bought a Black 2007 Hyundai Santa Fe and let Mosby drive the vehicle. On 08-15-2015, Officers responded to 1339 E. 79th St and recovered the victim's Hyundai Santa Fe from Mosby. The call notes from the call at 1339 E. 79th St show the calling party as the victim and state he was there to get the Santa Fe back from his girlfriend "Crystal", who was using the car, and did not bring it back.

The family of the victim advised after the murder, the Santa Fe was missing from the victim's residence. On 09-01-2015 the Santa Fe was found abandoned at 4502 Montgall. The vehicle had been painted with white spray paint and purple house paint. When the vehicle was processed for evidence, four bags of clothing and a can of white spray paint were found inside the vehicle. While inventorying and recovering the clothing, a gray pair of pants stained with purple and white paint was found. A receipt dated 08-23-2015 at 1650 hours was found in a pocket of the gray pants. The receipt showed a food stamp card was used to purchase the items on the receipt. An investigator with the Missouri Department of Social Services was contacted in regard to the receipt, who advised the card used to purchase the items on the receipt was Mosby's. The Investigator also advised Mosby's ID number would have been needed to complete the transaction.

PROBABLE CAUSE STATEMENT FORM

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The victim's daughter provided detectives with a voicemail from the victim on her phone from 08-22-2015 at 0645 hours. In the victim's message he told his daughter she could go to his house to do her laundry. He states Crystel is at the house and would the victim' daughter in the house.

Another witness was contacted who stated he spoke to the victim on 08-22-2015 between 2330 and 2400 hours. The witness advised when he spoke to the victim; a female named "Crystel" was at the residence. The victim mentioned setting up a threesome with "Crystel" and the witness.

Paint recovered from the exterior of the Santa Fe was compared to the paint recovered off the gray pants and the white spray paint can found inside the vehicle. The Crime Laboratory determined the white paint found on the exterior of the vehicle matched the white paint from the spray paint can, and the white paint found on the gray pants. The Crime Laboratory determined the purple paint found on the exterior of the vehicle matched the purple paint on the gray pants. A DNA profile was developed from the interior of the gray pants which was attributed to an unknown female.

Mosby was arrested in regard to the victim's murder on 02-01-2017 and transported to the Jackson County Jail. On 02-02-2017 after waiving her Miranda Rights, Mosby admitted to shooting the victim and setting the house on fire. Mosby also admitted to painting the Santa Fe with the help of an unknown black male.

Printed Name Detective Scott Emery #4161 Signature /s/Det. Scott Emery #4161

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

Judge

Circuit Court of _____ County, State of Missouri.