

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

POLICE NO. :	17-094887 / 17-090910
PROSECUTOR NO. :	095442289

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
 ELLWYN T. BROWN)
)
 6928 Paseo,) **CASE NO. 1716-CR**
 Kansas City, MO - 64132) **DIVISION**
 DOB: 06/26/1999)
)
 Race/Sex: B/M;)
)
 SSN: XXX-XX)
)
 DEFENDANT.)

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, 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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, forcibly stole money in the charge of [REDACTED], and in the course thereof defendant or another participant in the offense was armed with a deadly weapon.

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 (571.015-001Y19755212.0)

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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, committed the felony of robbery in the first degree charged in Count 1, 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.

State vs. Ellwyn T. Brown

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.

Count III. Stealing - Motor Vehicle/watercraft/aircraft (570.030-038Y20172404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, appropriated a black 2014 Ford Fusion, a motor vehicle, which property was owned by [REDACTED] and defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof.

The range of punishment for a class D 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 ten thousand dollars (\$10,000); 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.

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.

State vs. Ellwyn T. Brown

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/ Kristiane N. Bryant

Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St. Floor 7M
Kansas City, MO - 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

DET Jennifer A. Blythe , 1125 Locust, Kansas City, MO - 64106

[REDACTED]
[REDACTED]

DET Michael R. Buente , 1125 Locust, Kansas City, MO - 64106

PO Laura K. Easley , 1125 Locust, Kansas City, MO - 64106

PO Nathan T. Hall , 1125 Locust, Kansas City, MO - 64106

[REDACTED]
[REDACTED]

DET Eric M. Krawchuk , 1125 Locust, Kansas City, MO - 64106

DET Robert A. Maser , 1125 Locust, Kansas City, MO - 64106

DET Paul A. Oxler , 1125 Locust, Kansas City, MO - 64106

Pizza Hut , Prosecuting Atty. Office, Kansas City, MO - 64106

[REDACTED]
[REDACTED]

PO Steven R. Weber , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 11/07/2017

CRN: 17-094887

I, Det. Jennifer Blythe, #5490, 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 11/06/2017, at 9515 Blue Ridge Blvd. in
(Date) (Address)

Kansas City, JACKSON Missouri Ellwyn Brown
(County) (Name of Offender(s))

B/M, 06/26/1999, SSN# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Armed Robbery

Armed Criminal Action

Tampering

The facts supporting this belief are as follows:

On 11/06/2017 at approximately 2000 hours, officers were dispatched to the Pizza Hut located at 9515 Blue Ridge Blvd., Jackson County, Missouri in regard to an armed robbery.

Upon arrival, officers contacted the witness who observed four black males with what appeared to be towels covering their faces run out the front door of the business and run towards a white 2015 Toyota RAV4 MO YH2V0U, VIN# 2T3RFREV9FW230364 (stolen auto CRN 17-090910). It appeared the suspects had trouble starting the vehicle and they ran back towards the business. The witness then observed the suspect enter a dark colored sedan (black 2014 Ford Fusion, MO HNOE7M, VIN# 3FA6P0G75ER259458).

Victim #2 was contacted and stated he was working when four black males wearing dark clothing used physical force and a long black rifle to break the glass of the business to gain entry. Victim #2 then observed the suspects jump the front counter. Victims #2-7 fled to the back bathroom and shut the door. One of the suspects asked victim #7, the assistant manager, about access to the safe. The victims were ordered to empty their pockets. During this, victim #2 keys dropped to the ground. The suspects told victim #2 to use his key to open the tip jar. The suspects then took several \$20 dollar bills from the tip jar. They were all then ordered to the back room and ended up locking themselves in the bathroom. After the suspects left the employees went back to the front of the business. Once the police arrived, victim #2 observed his keys that he dropped were missing and his vehicle (aforementioned black Ford Fusion) was no longer in the parking lot.

Officers recovered a black airsoft pistol underneath cooking equipment inside Pizza Hut. Officers also recovered the white Toyota RAV4 that was in between the addresses of 9519 and 9517 Blue Ridge Blvd facing westbound. Officers observed the front passenger side door to be open and a mostly empty cash drawer in the back passenger seat. At the time of the recovery, the white Toyota RAV4 had Missouri Temporary Tag 0351BL, which responded back as expired to a 2000 Pontiac.

On 11/06/2017 at 2146 hours, officers were dispatched to Research Medical Center located 2316 E. Meyer Blvd. on a reported gunshot victim. Upon arrival, officers contacted Adrian Stallings B/M,

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9/13/1998, who stated that he and his friends were walking around the area of 80th & Paseo when an unknown party in an unknown vehicle shot at him, striking his hand. Stallings stated he had a 'beef' with a lot of people but would not provide any more information and became increasingly uncooperative and advised he did not want to talk to police and wanted to leave. Officers viewed video surveillance from Research Hospital and determined that Stallings and three other black males (later determined to be Ellshaun C. Brown, B/M, 06/26/99, Ellwyn Brown, B/M, 06/26/99 and Bryan C. Byers, B/M, 002/23/99) arrived in the black Ford Fusion. While interacting with Research Security, Byers advised he was carrying a firearm. A pink semiautomatic handgun was located on Byers person. Officers observed a black rifle, in plain view, on the back seat of the black Ford Fusion. Officers further observed apparent blood in the back middle seat. Officers were then notified by South Patrol officers that the black Ford Fusion at Research Hospital matched the description of a vehicle taken at the Pizza Hut robbery located at 9515 Blue Ridge Blvd. Officers then took Ellshaun, Ellwyn and Byers into custody. Stallings was treated for his gunshot wound and then taken into custody. A search incident to arrest of Byers revealed the following: a Ford key, 4 pennies, 10 nickels, 11 dimes, 12 quarters, four \$1 bills, one \$5 bill, and one \$10 bills. A search incident to arrest of Stallings revealed: 18 pennies, 19 nickels, 4 dimes, 5 quarters, ten \$1 bills, five \$5 bills, one \$10 bill, and five \$20 bills. A search incident to arrest of Ellshaun revealed: three \$5 bills, nine \$20 bills, and nineteen \$1 bills. A search incident to arrest of Ellwyn revealed: 144 pennies, 2 nickels, 5 dimes, 3 quarters, eleven \$1 bills, four \$5 bills, and six \$20 bills.

The surveillance video from Pizza Hut was reviewed and it showed four black male suspects enter the business, one armed with a long rifle. The video also showed the suspects removing cash from the register and one suspect leaving holding the register. One suspect was wearing dark colored pants, a black jacket, a light blue clothing article covering his face, and Nike slip on sandals. When Ellshaun was arrested he was wearing a black jacket, dark grey pants and Nike slip on sandals. Another suspect was dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. When Byers was arrested he was wearing dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. Another suspect was wearing all dark clothing and black shoes with a white sole. When Ellwyn was arrested he was wearing red pants, black shirt, black shoes with a red and white sole. Another suspect was wearing dark colored pants, blue hoodie, and black shoes with a thick white sole. Surveillance video at Research Hospital has Stallings walking in wearing dark colored pants, blue hoodie, and black shoes with a thick white sole.

Byers was contacted by detectives. Byers was transported from the Jackson County Detention Center to Police Headquarters. Byers was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. . Byers was then shown a still photograph taken from video surveillance and identified himself as the suspect wearing a blue sweatshirt, gray pants, black shoes and holding a long gun. Byers stated that he committed the robbery so he could have food and clothing. Byers denied stealing the Toyota RAV 4 but stated his DNA would be in the vehicle. Byers also denied arriving to the hospital in the black Ford Fusion but eventually admitted to walking into the hospital with the other suspects.

Stallings was contacted by detectives. Stallings was transported from the Jackson County Detention Center to Police Headquarters. Stallings was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. Stallings continued to lie about how his hand was injured, but eventually admitted that he lied and that

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he shot himself in the hand. Stallings first denied knowing Ellshaun, Ellwyn or Byers, but eventually admitted to knowing them. Stallings was then shown a still photograph taken from video surveillance and identified himself as the last suspect that entered the store wearing a blue hoodie and gray pants. Stallings stated he did not have a gun, but admitted to jumping over the counter of the business and taking \$20. Stallings further admitted that the black Ford Fusion that he was driven to the hospital in was stolen from the business they robbed.

Ellshaun was contacted by detectives. Ellshaun was transported from the Jackson County Detention Center to Police Headquarters. Ellshaun was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellshaun stated he understood his rights and wished to speak to detectives. Ellshaun originally stated he was high on narcotics and did not remember anything. Eventually, Ellshaun admitted that him, Ellwyn, Stallings and Byers robbed Pizza Hut. Ellshaun was shown four still photos taken from the surveillance video inside Pizza Hut. Ellshaun identified himself, Ellwyn, Stallings and Byers. Ellshaun stated the guns were his, but only remembered someone bringing the rifle inside to do the robbery. Ellshaun stated that Stallings was originally driving when they left Pizza Hut, but while he was driving he shot himself. Ellshaun further stated that they pulled over, Stallings got into the back seat and Byers drove them to the hospital.

Ellwyn was contacted by detectives. Ellwyn was transported from the Jackson County Detention Center to Police Headquarters. Ellwyn was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellwyn stated he understood his rights and wished to speak to detectives. Ellwyn stated Byers was driving the white Toyota RAV4 with Ellshaun and Stallings were in. He further stated that he believed it was stolen due to it having a temporary tag. Ellwyn admitted that he, Ellshaun, Byers and Stallings robbed the Pizza Hut. Ellwyn was shown still photographs taken from video surveillance and identified Byers, Stallings and Ellshaun. Ellwyn also identified himself in the photographs as being the first person to enter the business. He further stated that he was wearing the red pants underneath the dark colored pants. Ellwyn stated that before going to the hospital he removed the dark colored pants.

Printed Name Det. Jennifer Blythe, #5490 Signature /s/Det. Jennifer Blythe, #5490

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 NO. :	17-094887 / 17-090910
PROSECUTOR NO. :	095442285

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
ELLSHAUN C. BROWN	)	
6928 Paseo Blvd.,	)	CASE NO. 1716-CR
Kansas City, MO - 64132	)	DIVISION
DOB: 06/26/1999	)	
Race/Sex: B/M;	)	
SSN: XXX-XX-XXXX	)	
	)	
DEFENDANT.	)	

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, 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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, forcibly stole money in the charge of [REDACTED], and in the course thereof defendant or another participant in the offense was armed with a deadly weapon.

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 (571.015-001Y19755212.0)

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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, committed the felony of robbery in the first degree charged in Count 1, 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.

State vs. Ellshaun C. Brown

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.

Count III. Stealing - Motor Vehicle/watercraft/aircraft (570.030-038Y20172404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the **class D felony of stealing**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, appropriated a black 2014 Ford Fusion, a motor vehicle, which property was owned by [REDACTED], and defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof.

The range of punishment for a class D 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 ten thousand dollars (\$10,000); 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.

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.

State vs. Ellshaun C. Brown

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kristiane N. Bryant

Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St. Floor 7M
Kansas City, MO - 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

DET Jennifer A. Blythe , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

DET Michael R. Buente , 1125 Locust, Kansas City, MO - 64106

PO Laura K. Easley , 1125 Locust, Kansas City, MO - 64106

PO Nathan T. Hall , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

DET Eric M. Krawchuk, 1125 Locust, Kansas City, MO - 64106

DET Robert A. Maser , 1125 Locust, Kansas City, MO - 64106

DET Paul A. Oxler , 1125 Locust, Kansas City, MO - 64106

Pizza Hut , Prosecuting Atty. Office, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

06

PO Steven R. Weber , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 11/07/2017

CRN: 17-094887

I, Det. Jennifer Blythe, #5490, 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 11/06/2017, at 9515 Blue Ridge Blvd. in
(Date) (Address)

Kansas City, JACKSON Missouri Ellshaun C. Brown
(County) (Name of Offender(s))

B/M, 06/26/1999, SSN# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Armed Robbery

Armed Criminal Action

Tampering

The facts supporting this belief are as follows:

On 11/06/2017 at approximately 2000 hours, officers were dispatched to the Pizza Hut located at 9515 Blue Ridge Blvd., Jackson County, Missouri in regard to an armed robbery.

Upon arrival, officers contacted the witness who observed four black males with what appeared to be towels covering their faces run out the front door of the business and run towards a white 2015 Toyota RAV4 MO-YH2V0U, VIN# 2T3RFREV9FW230364 (stolen auto CRN 17-090910). It appeared the suspects had trouble starting the vehicle and they ran back towards the business. The witness then observed the suspect enter a dark colored sedan (black 2014 Ford Fusion, MO HN0E7M, VIN# 3FA6P0G75ER259458).

Victim #2 was contacted and stated he was working when four black males wearing dark clothing used physical force and a long black rifle to break the glass of the business to gain entry. Victim #2 then observed the suspects jump the front counter. Victims #2-7 fled to the back bathroom and shut the door. One of the suspects asked victim #7, the assistant manager, about access to the safe. The victims were ordered to empty their pockets. During this, victim #2 keys dropped to the ground. The suspects told victim #2 to use his key to open the tip jar. The suspects then took several \$20 dollar bills from the tip jar. They were all then ordered to the back room and ended up locking themselves in the bathroom. After the suspects left the employees went back to the front of the business. Once the police arrived, victim #2 observed his keys that he

PROBABLE CAUSE STATEMENT FORM

CRN 17-094887

dropped were missing and his vehicle (aforementioned black Ford Fusion) was no longer in the parking lot.

Officers recovered a black airsoft pistol underneath cooking equipment inside Pizza Hut. Officers also recovered the white Toyota RAV4 that was in between the addresses of 9519 and 9517 Blue Ridge Blvd facing westbound. Officers observed the front passenger side door to be open and a mostly empty cash drawer in the back passenger seat. At the time of the recovery, the white Toyota RAV4 had Missouri Temporary Tag 0351BL, which responded back as expired to a 2000 Pontiac.

On 11/06/2017 at 2146 hours, officers were dispatched to Research Medical Center located 2316 E. Meyer Blvd. on a reported gunshot victim. Upon arrival, officers contacted Adrian Stallings B/M, 9/13/1998, who stated that he and his friends were walking around the area of 80th & Paseo when an unknown party in an unknown vehicle shot at him, striking his hand. Stallings stated he had a 'beef' with a lot of people but would not provide any more information and became increasingly uncooperative and advised he did not want to talk to police and wanted to leave. Officers viewed video surveillance from Research Hospital and determined that Stallings and three other black males (later determined to be Ellshaun C. Brown, B/M, 06/26/99, Ellwyn Brown, B/M, 06/26/99 and Bryan C. Byers, B/M, 002/23/99) arrived in the black Ford Fusion. While interacting with Research Security, Byers advised he was carrying a firearm. A pink semiautomatic handgun was located on Byers person. Officers observed a black rifle, in plain view, on the back seat of the black Ford Fusion. Officers further observed apparent blood in the back middle seat. Officers were then notified by South Patrol officers that the black Ford Fusion at Research Hospital matched the description of a vehicle taken at the Pizza Hut robbery located at 9515 Blue Ridge Blvd. Officers then took Ellshaun, Ellwyn and Byers into custody. Stallings was treated for his gunshot wound and then taken into custody. A search incident to arrest of Byers revealed the following: a Ford key, 4 pennies, 10 nickels, 11 dimes, 12 quarters, four \$1 bills, one \$5 bill, and one \$10 bills. A search incident to arrest of Stallings revealed: 18 pennies, 19 nickels, 4 dimes, 5 quarters, ten \$1 bills, five \$5 bills, one \$10 bill, and five \$20 bills. A search incident to arrest of Ellshaun revealed: three \$5 bills, nine \$20 bills, and nineteen \$1 bills. A search incident to arrest of Ellwyn revealed: 144 pennies, 2 nickels, 5 dimes, 3 quarters, eleven \$1 bills, four \$5 bills, and six \$20 bills.

The surveillance video from Pizza Hut was reviewed and it showed four black male suspects enter the business, one armed with a long rifle. The video also showed the suspects removing cash from the register and one suspect leaving holding the register. One suspect was wearing dark colored pants, a black jacket, a light blue clothing article

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CRN 17-094887

covering his face, and Nike slip on sandals. When Ellshaun was arrested he was wearing a black jacket, dark grey pants and Nike slip on sandals. Another suspect was dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. When Byers was arrested he was wearing dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. Another suspect was wearing all dark clothing and black shoes with a white sole. When Ellwyn was arrested he was wearing red pants, black shirt, black shoes with a red and white sole. Another suspect was wearing dark colored pants, blue hoodie, and black shoes with a thick white sole. Surveillance video at Research Hospital has Stallings walking in wearing dark colored pants, blue hoodie, and black shoes with a thick white sole.

Byers was contacted by detectives. Byers was transported from the Jackson County Detention Center to Police Headquarters. Byers was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. Byers was then shown a still photograph taken from video surveillance and identified himself as the suspect wearing a blue sweatshirt, gray pants, black shoes and holding a long gun. Byers stated that he committed the robbery so he could have food and clothing. Byers denied stealing the Toyota RAV 4 but stated his DNA would be in the vehicle. Byers also denied arriving to the hospital in the black Ford Fusion but eventually admitted to walking into the hospital with the other suspects.

Adrian Stallings was contacted by detectives. Stallings was transported from the Jackson County Detention Center to Police Headquarters. Stallings was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. Stallings continued to lie about how his hand was injured, but eventually admitted that he lied and that he shot himself in the hand. Stallings first denied knowing Ellshaun, Ellwyn or Byers, but eventually admitted to knowing them. Stallings was then shown a still photograph taken from video surveillance and identified himself as the last suspect that entered the store wearing a blue hoodie and gray pants. Stallings stated he did not have a gun, but admitted to jumping over the counter of the business and taking \$20. Stallings further admitted that the black Ford Fusion that he was driven to the hospital in was stolen from the business they robbed.

Ellshaun Brown was contacted by detectives. Ellshaun was transported from the Jackson County Detention Center to Police Headquarters. Ellshaun was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellshaun stated he understood his rights and wished to speak to detectives. Ellshaun originally stated he was high on narcotics and did not remember anything. Eventually, Ellshaun admitted that him,

PROBABLE CAUSE STATEMENT FORM

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Ellwyn, Stallings and Byers robbed Pizza Hut. Ellshaun was shown four still photos taken from the surveillance video inside Pizza Hut. Ellshaun identified himself, Ellwyn, Stallings and Byers. Ellshaun stated the guns were his, but only remembered someone bringing the rifle inside to do the robbery. Ellshaun stated that Stallings was originally driving when they left Pizza Hut, but while he was driving he shot himself. Ellshaun further stated that they pulled over, Stallings got into the back seat and Byers drove them to the hospital.

Ellwyn Brown was contacted by detectives. Ellwyn was transported from the Jackson County Detention Center to Police Headquarters. Ellwyn was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellwyn stated he understood his rights and wished to speak to detectives. Ellwyn stated Byers was driving the white Toyota RAV4 with Ellshaun and Stallings were in. He further stated that he believed it was stolen due to it having a temporary tag. Ellwyn admitted that he, Ellshaun, Byers and Stallings robbed the Pizza Hut. Ellwyn was shown still photographs taken from video surveillance and identified Byers, Stallings and Ellshaun. Ellwyn also identified himself in the photographs as being the first person to enter the business. He further stated that he was wearing the red pants underneath the dark colored pants. Ellwyn stated that before going to the hospital he removed the dark colored pants.

Printed Name Det. Jennifer Blythe, #5490 Signature /s/Det. Jennifer Blythe, #5490

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 NO. :	17-094887 / 17-090910
PROSECUTOR NO. :	095442291

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
 BRYAN C. BYERS)
)
 2223 E. 69th St.,) **CASE NO. 1716-CR**
 Kansas City, MO - 64132) **DIVISION**
 DOB: 02/23/1999)
)
 Race/Sex: B/M;)
)
 SSN: XXX-XX)
 DEFENDANT.)

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, 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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, forcibly stole money in the charge of [REDACTED] and in the course thereof defendant or another participant in the offense was armed with a deadly weapon.

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 (571.015-001Y19755212.0)

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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, committed the felony of robbery in the first degree charged in Count 1, 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.

State vs. Bryan C. Byers

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.

Count III. Stealing - Motor Vehicle/watercraft/aircraft (570.030-038Y20172404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the **class D felony of stealing**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, appropriated a black 2014 Ford Fusion, a motor vehicle, which property was owned by [REDACTED], and defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof.

The range of punishment for a class D 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 ten thousand dollars (\$10,000); 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.

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.

State vs. Bryan C. Byers

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/ Kristiane N. Bryant

Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St. Floor 7M
Kansas City, MO - 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

DET Jennifer A. Blythe , 1125 Locust, Kansas City, MO - 64106

[REDACTED]
[REDACTED]

DET Michael R. Buente , 1125 Locust, Kansas City, MO - 64106

PO Laura K. Easley , 1125 Locust, Kansas City, MO - 64106

PO Nathan T. Hall , 1125 Locust, Kansas City, MO - 64106

[REDACTED]
[REDACTED]

DET Eric M. Krawchuk , 1125 Locust, Kansas City, MO - 64106

DET Robert A. Maser , 1125 Locust, Kansas City, MO - 64106

DET Paul A. Oxler , 1125 Locust, Kansas City, MO - 64106

Pizza Hut , Prosecuting Atty. Office, Kansas City, MO - 64106

[REDACTED]
[REDACTED]

PO Steven R. Weber , 1125 Locust, Kansas City, MO - 64106

[REDACTED] 4106

PROBABLE CAUSE STATEMENT FORM

Date: 11/07/2017

CRN: 17-094887

I, Det. Jennifer Blythe, #5490, 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 11/06/2017, at 9515 Blue Ridge Blvd in
(Date) (Address)

Kansas City, JACKSON Missouri Bryan C. Byers
(County) (Name of Offender(s))

B/M, 02/23/1999 SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Armed Robbery

Armed Criminal Action

Tampering

The facts supporting this belief are as follows:

On 11/06/2017 at approximately 2000 hours, officers were dispatched to the Pizza Hut located at 9515 Blue Ridge Blvd., Jackson County, Missouri in regard to an armed robbery.

Upon arrival, officers contacted the witness who observed four black males with what appeared to be towels covering their faces run out the front door of the business and run towards a white 2015 Toyota RAV4 MO YH2V0U, VIN# 2T3RFREV9FW230364 (stolen auto CRN 17-090910). It appeared the suspects had trouble starting the vehicle and they ran back towards the business. The witness then observed the suspect enter a dark colored sedan (black 2014 Ford Fusion, MO HN0E7M, VIN# 3FA6P0G75ER259458).

Victim #2 was contacted and stated he was working when four black males wearing dark clothing used physical force and a long black rifle to break the glass of the business to gain entry. Victim #2 then observed the suspects jump the front counter. Victims #2-7 fled to the back bathroom and shut the door. One of the suspects asked victim #7, the assistant manager, about access to the safe. The victims were ordered to empty their pockets. During this, victim #2 keys dropped to the ground. The suspects told victim #2 to use his key to open the tip jar. The suspects then took several \$20 dollar bills from the tip jar. They were all then ordered to the back room and ended up locking themselves in the bathroom. After the suspects left the employees went back to the front of the business. Once the police arrived, victim #2 observed his keys that he dropped were missing and his vehicle (aforementioned black Ford Fusion) was no longer in the parking lot.

Officers recovered a black airsoft pistol underneath cooking equipment inside Pizza Hut. Officers also recovered the white Toyota RAV4 that was in between the addresses of 9519 and 9517 Blue Ridge Blvd facing westbound. Officers observed the front passenger side door to be open and a mostly empty cash drawer in the back passenger seat. At the time of the recovery, the white Toyota RAV4 had Missouri Temporary Tag 0351BL, which responded back as expired to a 2000 Pontiac.

On 11/06/2017 at 2146 hours, officers were dispatched to Research Medical Center located 2316 E. Meyer Blvd. on a reported gunshot victim. Upon arrival, officers contacted Adrian Stallings B/M,

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CRN 17-094887

9/13/1998, who stated that he and his friends were walking around the area of 80th & Paseo when an unknown party in an unknown vehicle shot at him, striking his hand. Stallings stated he had a 'beef' with a lot of people but would not provide any more information and became increasingly uncooperative and advised he did not want to talk to police and wanted to leave. Officers viewed video surveillance from Research Hospital and determined that Stallings and three other black males (later determined to be Ellshaun C. Brown, B/M, 06/26/99, Ellwyn Brown, B/M, 06/26/99 and Bryan C. Byers, B/M, 002/23/99) arrived in the black Ford Fusion. While interacting with Research Security, Byers advised he was carrying a firearm. A pink semiautomatic handgun was located on Byers person. Officers observed a black rifle, in plain view, on the back seat of the black Ford Fusion. Officers further observed apparent blood in the back middle seat. Officers were then notified by South Patrol officers that the black Ford Fusion at Research Hospital matched the description of a vehicle taken at the Pizza Hut robbery located at 9515 Blue Ridge Blvd. Officers then took Ellshaun, Ellwyn and Byers into custody. Stallings was treated for his gunshot wound and then taken into custody. A search incident to arrest of Byers revealed the following: a Ford key, 4 pennies, 10 nickels, 11 dimes, 12 quarters, four \$1 bills, one \$5 bill, and one \$10 bills. A search incident to arrest of Stallings revealed: 18 pennies, 19 nickels, 4 dimes, 5 quarters, ten \$1 bills, five \$5 bills, one \$10 bill, and five \$20 bills. A search incident to arrest of Ellshaun revealed: three \$5 bills, nine \$20 bills, and nineteen \$1 bills. A search incident to arrest of Ellwyn revealed: 144 pennies, 2 nickels, 5 dimes, 3 quarters, eleven \$1 bills, four \$5 bills, and six \$20 bills.

The surveillance video from Pizza Hut was reviewed and it showed four black male suspects enter the business, one armed with a long rifle. The video also showed the suspects removing cash from the register and one suspect leaving holding the register. One suspect was wearing dark colored pants, a black jacket, a light blue clothing article covering his face, and Nike slip on sandals. When Ellshaun was arrested he was wearing a black jacket, dark grey pants and Nike slip on sandals. Another suspect was dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. When Byers was arrested he was wearing dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. Another suspect was wearing all dark clothing and black shoes with a white sole. When Ellwyn was arrested he was wearing red pants, black shirt, black shoes with a red and white sole. Another suspect was wearing dark colored pants, blue hoodie, and black shoes with a thick white sole. Surveillance video at Research Hospital has Stallings walking in wearing dark colored pants, blue hoodie, and black shoes with a thick white sole.

Byers was contacted by detectives. Byers was transported from the Jackson County Detention Center to Police Headquarters. Byers was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. Byers was then shown a still photograph taken from video surveillance and identified himself as the suspect wearing a blue sweatshirt, gray pants, black shoes and holding a long gun. Byers stated that he committed the robbery so he could have food and clothing. Byers denied stealing the Toyota RAV 4 but stated his DNA would be in the vehicle. Byers also denied arriving to the hospital in the black Ford Fusion but eventually admitted to walking into the hospital with the other suspects.

Adrian Stallings was contacted by detectives. Stallings was transported from the Jackson County Detention Center to Police Headquarters. Stallings was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. Stallings continued to lie about how his hand was injured, but eventually admitted that he lied and that

PROBABLE CAUSE STATEMENT FORM

CRN 17-094887

he shot himself in the hand. Stallings first denied knowing Ellshaun, Ellwyn or Byers, but eventually admitted to knowing them. Stallings was then shown a still photograph taken from video surveillance and identified himself as the last suspect that entered the store wearing a blue hoodie and gray pants. Stallings stated he did not have a gun, but admitted to jumping over the counter of the business and taking \$20. Stallings further admitted that the black Ford Fusion that he was driven to the hospital in was stolen from the business they robbed.

Ellshaun Brown was contacted by detectives. Ellshaun was transported from the Jackson County Detention Center to Police Headquarters. Ellshaun was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellshaun stated he understood his rights and wished to speak to detectives. Ellshaun originally stated he was high on narcotics and did not remember anything. Eventually, Ellshaun admitted that him, Ellwyn, Stallings and Byers robbed Pizza Hut. Ellshaun was shown four still photos taken from the surveillance video inside Pizza Hut. Ellshaun identified himself, Ellwyn, Stallings and Byers. Ellshaun stated the guns were his, but only remembered someone bringing the rifle inside to do the robbery. Ellshaun stated that Stallings was originally driving when they left Pizza Hut, but while he was driving he shot himself. Ellshaun further stated that they pulled over, Stallings got into the back seat and Byers drove them to the hospital.

Ellwyn Brown was contacted by detectives. Ellwyn was transported from the Jackson County Detention Center to Police Headquarters. Ellwyn was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellwyn stated he understood his rights and wished to speak to detectives. Ellwyn stated Byers was driving the white Toyota RAV4 with Ellshaun and Stallings were in. He further stated that he believed it was stolen due to it having a temporary tag. Ellwyn admitted that he, Ellshaun, Byers and Stallings robbed the Pizza Hut. Ellwyn was shown still photographs taken from video surveillance and identified Byers, Stallings and Ellshaun. Ellwyn also identified himself in the photographs as being the first person to enter the business. He further stated that he was wearing the red pants underneath the dark colored pants. Ellwyn stated that before going to the hospital he removed the dark colored pants.

Printed Name Det. Jennifer Blythe, #5490 Signature /s/Det. Jennifer Blythe, #5490

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 NO. :	17-094887
PROSECUTOR NO. :	095442292

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
ADRIAN D. STALLINGS	)	
1407 E. 65th St.,	)	CASE NO. 1716-CR
Kansas City, MO - 64132	)	DIVISION
DOB: 09/13/1998	)	
Race/Sex: B/M;	)	
SSN: XXX-XX-████	)	
DEFENDANT.	)	

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, 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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, forcibly stole money in the charge of ██████████, and in the course thereof defendant or another participant in the offense was armed with a deadly weapon. 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 (571.015-001Y19755212.0)

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 November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, committed the felony of robbery in the first degree charged in Count 1, 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.

State vs. Adrian D. Stallings

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.

Count III. Stealing - Motor Vehicle/watercraft/aircraft (570.030-038Y20172404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the **class D felony of stealing**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 6, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, appropriated a black 2014 Ford Fusion, a motor vehicle, which property was owned by [REDACTED], and defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof.

The range of punishment for a class D 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 ten thousand dollars (\$10,000); 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

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.

State vs. Adrian D. Stallings

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/ Kristiane N. Bryant

Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St. Floor 7M
Kansas City, MO - 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

DET Jennifer A. Blythe , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

[REDACTED] R. Buente , 1125 Locust, Kansas City, MO - 64106

PO Laura K. Easley , 1125 Locust, Kansas City, MO - 64106

PO Nathan T. Hall , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

DET Eric M. Krawchuk , 1125 Locust, Kansas City, MO - 64106

DET Robert A. Maser , 1125 Locust, Kansas City, MO - 64106

DET Paul A. Oxler , 1125 Locust, Kansas City, MO - 64106

Pizza Hut , Prosecuting Atty. Office, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

PO Steven R. Weber , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 11/07/2017

CRN: 17-094887

I, Det. Jennifer Blythe, #5490, 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 11/06/2017, at 9515 Blue Ridge Blvd. in
(Date) (Address)

Kansas City, JACKSON Missouri Adrian D. Stallings
(County) (Name of Offender(s))

B/M, 09/13/1998, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Armed Robbery

Armed Criminal Action

Tampering with a motor vehicle

The facts supporting this belief are as follows:

On 11/06/2017 at approximately 2000 hours, officers were dispatched to the Pizza Hut located at 9515 Blue Ridge Blvd., Jackson County, Missouri in regard to an armed robbery.

Upon arrival, officers contacted the witness who observed four black males with what appeared to be towels covering their faces run out the front door of the business and run towards a white 2015 Toyota RAV4 MO YH2V0U, VIN# 2T3RFREV9FW230364 (stolen auto CRN 17-090910). It appeared the suspects had trouble starting the vehicle and they ran back towards the business. The witness then observed the suspect enter a dark colored sedan (black 2014 Ford Fusion, MO HN0E7M, VIN# 3FA6P0G75ER259458).

Victim #2 was contacted and stated he was working when four black males wearing dark clothing used physical force and a long black rifle to break the glass of the business to gain entry. Victim #2 then observed the suspects jump the front counter. Victims #2-7 fled to the back bathroom and shut the door. One of the suspects asked victim #7, the assistant manager, about access to the safe. The victims were ordered to empty their pockets. During this, victim #2 keys dropped to the ground. The suspects told victim #2 to use his key to open the tip jar. The suspects then took several \$20 dollar bills from the tip jar. They were all then ordered to the back room and ended up locking themselves in the bathroom. After the suspects left the employees went back to the front of the business. Once the police arrived, victim #2 observed his keys that he dropped were missing and his vehicle (aforementioned black Ford Fusion) was no longer in the parking lot.

Officers recovered a black airsoft pistol underneath cooking equipment inside Pizza Hut. Officers also recovered the white Toyota RAV4 that was in between the addresses of 9519 and 9517 Blue Ridge Blvd facing westbound. Officers observed the front passenger side door to be open and a mostly empty cash drawer in the back passenger seat. At the time of the recovery, the white Toyota RAV4 had Missouri Temporary Tag 0351BL, which responded back as expired to a 2000 Pontiac.

On 11/06/2017 at 2146 hours, officers were dispatched to Research Medical Center located 2316 E. Meyer Blvd. on a reported gunshot victim. Upon arrival, officers contacted Adrian Stallings B/M, 9/13/1998, who stated that he and his friends were walking around the area of 80th & Paseo when an unknown party in an unknown vehicle shot at him, striking his hand. Stallings stated he had a 'beef' with a lot of people but would

PROBABLE CAUSE STATEMENT FORM

CRN 17-094887

not provide any more information and became increasingly uncooperative and advised he did not want to talk to police and wanted to leave. Officers viewed video surveillance from Research Hospital and determined that Stallings and three other black males (later determined to be Ellshaun C. Brown, B/M, 06/26/99, Ellwyn Brown, B/M, 06/26/99 and Bryan C. Byers, B/M, 002/23/99) arrived in the black Ford Fusion. While interacting with Research Security, Byers advised he was carrying a firearm. A pink semiautomatic handgun was located on Byers person. Officers observed a black rifle, in plain view, on the back seat of the black Ford Fusion. Officers further observed apparent blood in the back middle seat. Officers were then notified by South Patrol officers that the black Ford Fusion at Research Hospital matched the description of a vehicle taken at the Pizza Hut robbery located at 9515 Blue Ridge Blvd. Officers then took Ellshaun, Ellwyn and Byers into custody. Stallings was treated for his gunshot wound and then taken into custody. A search incident to arrest of Byers revealed the following: a Ford key, 4 pennies, 10 nickels, 11 dimes, 12 quarters, four \$1 bills, one \$5 bill, and one \$10 bills. A search incident to arrest of Stallings revealed: 18 pennies, 19 nickels, 4 dimes, 5 quarters, ten \$1 bills, five \$5 bills, one \$10 bill, and five \$20 bills. A search incident to arrest of Ellshaun revealed: three \$5 bills, nine \$20 bills, and nineteen \$1 bills. A search incident to arrest of Ellwyn revealed: 144 pennies, 2 nickels, 5 dimes, 3 quarters, eleven \$1 bills, four \$5 bills, and six \$20 bills.

The surveillance video from Pizza Hut was reviewed and it showed four black male suspects enter the business, one armed with a long rifle. The video also showed the suspects removing cash from the register and one suspect leaving holding the register. One suspect was wearing dark colored pants, a black jacket, a light blue clothing article covering his face, and Nike slip on sandals. When Ellshaun was arrested he was wearing a black jacket, dark grey pants and Nike slip on sandals. Another suspect was dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. When Byers was arrested he was wearing dark colored pants, a blue hoodie, and black shoes with a white sole and a white pattern by the laces. Another suspect was wearing all dark clothing and black shoes with a white sole. When Ellwyn was arrested he was wearing red pants, black shirt, black shoes with a red and white sole. Another suspect was wearing dark colored pants, blue hoodie, and black shoes with a thick white sole. Surveillance video at Research Hospital has Stallings walking in wearing dark colored pants, blue hoodie, and black shoes with a thick white sole.

Byers was contacted by detectives. Byers was transported from the Jackson County Detention Center to Police Headquarters. Byers was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. Byers was then shown a still photograph taken from video surveillance and identified himself as the suspect wearing a blue sweatshirt, gray pants, black shoes and holding a long gun. Byers stated that he committed the robbery so he could have food and clothing. Byers denied stealing the Toyota RAV 4 but stated his DNA would be in the vehicle. Byers also denied arriving to the hospital in the black Ford Fusion but eventually admitted to walking into the hospital with the other suspects.

Stallings was contacted by detectives. Stallings was transported from the Jackson County Detention Center to Police Headquarters. Stallings was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Byers stated he understood his rights and wished to speak to detectives. Stallings continued to lie about how his hand was injured, but eventually admitted that he lied and that he shot himself in the hand. Stallings first denied knowing Ellshaun, Ellwyn or Byers, but eventually admitted to knowing them. Stallings was then shown a still photograph taken from video surveillance and identified himself as the last suspect that entered the store wearing a blue hoodie and gray pants. Stallings stated he did not have a gun, but admitted to jumping over the counter of the business and taking \$20. Stallings further admitted that the black Ford Fusion that he was driven to the hospital in was stolen from the business they robbed.

PROBABLE CAUSE STATEMENT FORM

CRN 17-094887

Ellshaun was contacted by detectives. Ellshaun was transported from the Jackson County Detention Center to Police Headquarters. Ellshaun was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellshaun stated he understood his rights and wished to speak to detectives. Ellshaun originally stated he was high on narcotics and did not remember anything. Eventually, Ellshaun admitted that him, Ellwyn, Stallings and Byers robbed Pizza Hut. Ellshaun was shown four still photos taken from the surveillance video inside Pizza Hut. Ellshaun identified himself, Ellwyn, Stallings and Byers. Ellshaun stated the guns were his, but only remembered someone bringing the rifle inside to do the robbery. Ellshaun stated that Stallings was originally driving when they left Pizza Hut, but while he was driving he shot himself. Ellshaun further stated that they pulled over, Stallings got into the back seat and Byers drove them to the hospital.

Ellwyn was contacted by detectives. Ellwyn was transported from the Jackson County Detention Center to Police Headquarters. Ellwyn was read his rights via the Miranda Warning and Waiver, Form 340 P.D. Ellwyn stated he understood his rights and wished to speak to detectives. Ellwyn stated Byers was driving the white Toyota RAV4 with Ellshaun and Stallings were in. He further stated that he believed it was stolen due to it having a temporary tag. Ellwyn admitted that he, Ellshaun, Byers and Stallings robbed the Pizza Hut. Ellwyn was shown still photographs taken from video surveillance and identified Byers, Stallings and Ellshaun. Ellwyn also identified himself in the photographs as being the first person to enter the business. He further stated that he was wearing the red pants underneath the dark colored pants. Ellwyn stated that before going to the hospital he removed the dark colored pants.

Printed Name Det. Jennifer Blythe, #5490 Signature /s/Det. Jennifer Blythe, #5490

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

Judge

Circuit Court of _____ County, State of Missouri.