

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

|                         |           |
|-------------------------|-----------|
| <b>POLICE NO. :</b>     | 05-044723 |
| <b>PROSECUTOR NO. :</b> | 095446388 |
| <b>OCN:</b>             |           |

STATE OF MISSOURI, )  
 )  
 PLAINTIFF, )  
 )  
 vs. )  
 )  
 )  
 NATHAN L. AYERS )  
 )  
 10506 E. 10th St. ) CASE NO. 1816-CR  
 ) DIVISION  
 Independence, MO 64052 )  
 )  
 DOB: 02/23/1990 )  
 )  
 Race/Sex: W/M )  
 )  
 [REDACTED] )  
 )  
 DEFENDANT. )

# COMPLAINT

**Count I. Murder 1st Degree (565.020-001Y19840903.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 on or about June 25, 2018, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Angela R Green by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years 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 June 25, 2018, in the County of Jackson, State of

**State vs. Nathan L. Ayers**

Missouri, the defendant committed the felony of Murder 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 Murder in the First 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. 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.

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/ Hallie L. Williams  
Hallie L. Williams (#66333)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-4488  
hwilliams@jacksongov.org

**WITNESSES:**

1. DET Dan Fries, 223 N. Memorial Drive, Independence, MO 64050

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

5. DET Todd Winborn, 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 06/28/18

Report #: 2018-44723

I, Roger Lane, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 06/25/18, at hrs, Nathan L. Ayers, W, M, 02/23/1990, [REDACTED] 10506 E. 10<sup>th</sup> St, Independence, Missouri 64052, Jackson County committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 06/26/18 at approximately 1354 hours, Independence Police Officers were dispatched to 10506 E. 10th Street to check on the well being of Angela Green after family had received information that she had been shot. Angela's father [REDACTED] located her red Volkswagen Beetle parked in front of the residence on the street. Officers were able to gain access into the residence by retrieving a key from the homeowner [REDACTED]. Upon entry into the residence, Independence Officers observed Angela Green deceased on the sofa in the living room with an apparent gunshot wound to her head. No other subjects were located inside. Angela's body was later taken to the Jackson County Medical Examiner's Office. On 06/27/2018 an autopsy was conducted and the preliminary findings revealed her cause of death to be gunshot wound to the head with the manner being homicide.

Independence Police Officer's contacted the homeowner [REDACTED] who stated that he was allowing his nephew; Nathan L. Ayers (herein referred to as the Defendant) to live at the residence. A search warrant was obtained for the residence. During the execution of the search warrant, a spent 9 mm shell casing was located on a blood soaked blanket that was on the sofa cushions next to the body of Angela Green. In the yard just east of the dwelling, a black wallet containing a Missouri ID belonging to [REDACTED] was found.

Independence Police Detective Kyle Jarnagin contacted [REDACTED] and interviewed him. [REDACTED] admitted he was inside the residence when Angela was shot in the early morning hours of 06/25/18, but wasn't sure of the exact time. [REDACTED] admitted that he had been using drugs around the time of this incident. He advised Angela was shot by the Defendant. He advised that the Defendant had confronted Angela about setting him up for a past murder that he allegedly committed. During the initial interview, [REDACTED] advised he was placed on his hands and knees at gun point by the Defendant just prior to shooting Angela. Information was obtained that [REDACTED] was given the gun by the Defendant to hide it after Angela was shot [REDACTED] was subsequently read his Miranda rights. [REDACTED] waived his rights and upon questioning about the new information admitted to hiding the gun in the attic of 10506 E. 10th Street. The gun was not located in the attic.

A trap and trace order for the Defendant's cell phone was obtained. The Defendant's cell phone was identified by family members who have since tried to speak with him and communicate through text messages. The trap and trace order included historical data. Upon review of the historical data, the Defendant's cell phone was placed in the area of the residence on 10506 E. 10th Street on 06/24/2018 via a cell tower site in very close proximity to the residence. At approximately 2330 hours, the Defendant's cell phone disconnected from that cell site and was tracked to various cell tower sites in Independence, Missouri. On 06/26/2018 at about 2030 hours, the Defendant's cell phone was observed via cell tower site information to travel eastbound out of the Kansas City area towards Warrensburg. During this time family members have had contact with the Defendant via this cell phone through text messages.

Detective Roger Lane 1344

/s/Det. Roger Lane 1344

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

THE COURT FINDS PROBABLE CAUSE:

\_\_\_\_\_  
Date

\_\_\_\_\_  
Judge