

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

Police# 16-002255  
Prosecutor# 095429064  
1616-CR  
OCN# B2101763

**COMPLAINT**

**STATE OF MISSOURI**

vs.

**Timothy A. Stanfield**  
**3317 E. 114th Terr.**  
**Kansas City, MO 64134**  
**DOB: 02/06/1996; Race/Sex: B/M;**  
**SS# [REDACTED]**  
**Defendant.**

**Count I. Murder in the Second Degree (565.021-001Y19840903.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Timothy A. Stanfield**, 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 January 9, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Hollis Burgin, III, 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, **Timothy A. Stanfield**, 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 January 9, 2016, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the Second Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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.

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.**

**Timothy A. Stanfield**

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,

---

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

WITNESSES:

Det. Nicholas A. Sola, 1125 Locust, Kansas City, MO 64106

Det. Joseph Nelson, 1125 Locust, Kansas City, MO 64106

Det. Garry Eastwood, 1125 Locust, Kansas City, MO 64106

Det. Bonita Cannon, 1125 Locust, Kansas City, MO 64106

██████ Jackson County Prosecutor, 415 E. 12<sup>th</sup> Street, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 01/15/2016

CRN: 16-002255

I, Det. Nicholas Sola #5136  
(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 01/09/2016, at 3333 Bridge Manor Dr. in  
(Date) (Address)

Kansas City, Jackson Missouri Stanfield, Timothy  
(County) (Name of Offender(s))

B/M, 02/06/1996 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 01/09/2016 at 2012 hours, officers of the Kansas City Missouri Police Department were dispatched to 3337 E. 113th Terr in Kansas City, Jackson County, Missouri in regard to a shooting.

Upon arrival officers contacted a witness who took them to 3333 Bridge Manor Dr. where they located the victim sitting in the driver's seat of a white Lincoln MKZ, suffering from an apparent gunshot wound to the head. Responding medical personal declared the victim deceased.

Detectives contacted the witness who provided the following information: The witness stated he was at the victim's residence when the victim received a phone call. The witness assumed it was for the victim to sell marijuana, because the witness knows the victim to sell marijuana. The victim received a text providing an address for them to meet (3306 Bridge Manor Dr 64137). They drove to the parking lot associated with the address. They parked their vehicle and the victim called the number that the text had come from three times in a row. No one answered the phone calls. A short time later the witness observed the suspect walking toward the car, and then get into the back seat, sitting behind the victim. The witness described the suspect as a light skinned black male, wearing a black hooded type jacket with white drawstrings. The victim drove the suspect to an ATM located inside a convenience store at 3401 E. Red Bridge Rd., to get money out to purchase marijuana from the victim. They drove back to the parking lot near 3306 Bridge Manor Dr. As the victim was retrieving marijuana to give to the suspect, the suspect shot the victim once in the head. The witness fled the scene. The witness further stated the two cell phones still in the vehicle belong to the victim.

Detectives responded to 3401 E. Red Bridge Rd., and obtained surveillance video for the time provided by the witness. Upon observing the video, detectives observed a white vehicle drive into the parking lot on 01/09/2016 at approx. 2000 hrs. The video showed a subject walk from the direction of the white vehicle and walk into the store. After walking into the store, the video shows the subject to be a light skinned black male, wearing a black hooded type jacket over a gray hooded sweatshirt with writing on the top of the hood and white drawstrings walk towards the ATM. The subject stood by the ATM for approx. 1 min., and then exited the store walking towards the white vehicle parked in the parking lot. The white vehicle is then seen driving away.

Detectives processed the victim's 2008 white in color Lincoln MKZ bearing Missouri License Plate AH5R2Y with VIN #3lnhm26t18r631206. During the processing, detectives recovered a silver in color ZTE cell phone belonging to the victim.

PROBABLE CAUSE STATEMENT FORM

CRN 16-002255

On 01/10/2016, detectives conducted a Cellebrite Data Dump on the ZTE cell phone belonging to the victim. Detectives observed a telephone call to 816-548-1148 around the time frame provided by the witness. Detectives observed four phone calls in the outgoing call log section of the phone data, of the same number, confirming the witness's statement to detectives.

On 01/12/2015, a court order was served to Bandwidth.com to provide subscriber information for the phone number located in the victim's cell phone, 816-548-1148. Bandwidth.com identified the phone number to belong to the internet application TextNow/Enflick in Ontario Canada. An emergency request (while awaiting a treaty request through the Department of Justice) was made to TextNow/Enflick and they provided an email address and subscriber information. Computer check of the email address revealed the name Stanfield, Timothy B/M, 02/06/1996, who lives at 3317 E. 114th Terr in Kansas City, Jackson County, Missouri.

On 01/12/2016 the witness was shown a photographic lineup which contained a photograph of Stanfield, Timothy, B/M, 02/06/1996, along with 5 photographs of subjects similar in appearance. The witness observed the lineup and positively identified Stanfield as the suspect who shot the victim.

On 01/13/2016 a stop order was issued for Timothy Stanfield, B/M, 02/06/1996.

On 01/13/2016 Detectives began surveillance on 3317 E. 114th Terr in Kansas City, Jackson County, Missouri. On 01/14/2016 at 1345 hours, the surveillance crews observed a person matching Stanfields description arrive at 3317 E. 114th Terr., use a key to enter the premises and then exit getting into a vehicle. The vehicle pulled away and officers conducted a car stop at 105th and Palmer. Stanfield was taken into custody as a result of the car stop. During a search incident to arrest officers located a .40 caliber handgun concealed in his right front pocket with one live round in the chamber and a magazine loaded with several live rounds of ammunition. Stanfield was also wearing a gray hooded sweatshirt with black writing on the hood and white drawstrings, similar to what detectives observed on the surveillance video from the convenience store located at 3401 E. Red Bridge Rd.

Stanfield was escorted to the 7<sup>th</sup> floor of Police HQ and while there asked for his attorney to present during questioning.

Printed Name Nicholas Sola Signature Det. N. Sola 8136

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.