

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

**Police# 16-034154
Prosecutor# 095432173
Court Case Number 1616-CR01828**

AMENDED COMPLAINT

STATE OF MISSOURI

vs.

**Brad J Lindsey
1800 Emanuel Blvd., #701
Kansas City, MO 64132
DOB: 04/30/1981; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

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 May 15, 2016, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of D'Adrian Bell (DOB: 02/16/1990) 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. Unlawful Use Of Weapon - Subsection 5 - While Intoxicated - Loaded Weapon
(571.030-011Y20145212.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(5), RSMo, committed the **class D felony of unlawful use of a weapon**, punishable upon conviction under Sections 571.030.8, 558.011 and 560.011, RSMo, in that on or about May 15, 2016, at 7206 Olive St., in the County of Jackson, State of Missouri, the defendant knowingly discharged a .38 caliber revolver, a loaded firearm, while the defendant was in an intoxicated condition.

The range 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 four (4) 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).

**Count III. Tampering With Physical Evidence In Felony Prosecution (575.100-
001Y19755006.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **class D felony of tampering with physical evidence**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about May 15, 2016, in the County of Jackson, State of Missouri, the defendant concealed defendant's cellular telephone, with the purpose to impair its availability in the investigation of the death of D'Adrian Bell (DOB: 02/16/1990), Kansas City Police Report Number 16-034154, an official investigation, and thereby impaired and obstructed the prosecution of defendant for the crime of murder in the second degree and unlawful use of a firearm, a felony.

The range 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 four (4) 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).

Count IV. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y19755006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **class D felony of tampering with physical evidence**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about May 15, 2016, in the County of Jackson, State of Missouri, the defendant concealed D'Adrian Bell's (DOB: 02/16/1990) cellular telephone, with the purpose to impair its availability in the investigation of the death of D'Adrian Bell (DOB: 02/16/1990), Kansas City Police Report Number 16-034154, an official investigation, and thereby impaired and obstructed the prosecution of defendant for the crime of murder in the second degree and unlawful use of a firearm, a felony.

The range 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 four (4) 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).

Count V. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y19755006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **class D felony of tampering with physical evidence**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about May 15, 2016, in the County of Jackson, State of Missouri, the defendant concealed a .38 revolver firearm, with the purpose to impair its availability in the investigation of the death of D'Adrian Bell (DOB: 02/16/1990), Kansas City Police Report Number 16-034154, an official investigation, and thereby impaired and obstructed the prosecution of defendant for the crime of murder in the second degree and unlawful use of a firearm, a felony.

The range 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 four (4) 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).

Count VI. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y19755006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the class D felony of tampering with physical evidence, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about May 15, 2016, in the County of Jackson, State of Missouri, the defendant concealed defendant's clothing, with the purpose to impair its availability in the investigation of the death of D'Adrian Bell (DOB: 02/16/1990), Kansas City Police Report Number 16-034154, an official investigation, and thereby impaired and obstructed the prosecution of defendant for the crime of murder in the second degree and unlawful use of a firearm, a felony.

The range 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 four (4) 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.

Brad J Lindsey

/s/James F. Stigall

James F. Stigall (#65391)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, Missouri 64106
(816) 881-3538
JStigall@jacksongov.org

WITNESSES:

[REDACTED]

DET Bonita Y. Cannon , 1125 Locust, Kansas City, MO 64106

[REDACTED]

DET William R. Martin , 1125 Locust, Kansas City, MO 64106

DET Joe A. Nelson , 1125 Locust, Kansas City, MO 64106

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

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 05/16/2016

CRN: 16-34154

I, Det. Joe Nelson #4964 (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 05/15/2016, at 7206 Olive St in (Date) (Address)

Kansas City, Jackson Missouri Brad Lindsey (County) (Name of Offender(s))

B/M, 04-30-1981, SSN # [redacted] committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows: On 05/15/2016 at approximately 0028 hours, Officers of the Kansas City Missouri Police Department were dispatched to 7206 Olive St, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, officers observed the victim, D'Adrian Bell B/M 02-16-1990, deceased on the floor of the southeast bedroom in the residence. The officers observed what appeared to be gunshot wounds. The victim was declared deceased at the scene.

The Jackson County Medical Examiner's Office ruled the death a homicide.

Witness #1 was contacted and stated the following: He was in his bedroom located at 7206 Olive when he heard an argument outside his bedroom. After exiting the bedroom he observed Bell and Lindsey arguing in the living room. At some point they walked into a nearby vacant bedroom. Bell was attempting to purchase narcotics from Lindsey and they began to argue about the price. The argument escalated to a physical confrontation in the bedroom across from his. Witness #1 stepped into the bedroom and forcefully separated Bell and Lindsey. After separating them, Lindsey produced a revolver type handgun and fired 2 shots, striking the victim, who eventually fell to the ground. Lindsey fled the scene. Witness #1 was shown a single photograph of Lindsey, Brad J. B/M, 04/30/1981 and identified him as the individual he observed shoot the victim.

Witness #2 was contacted and stated the following: Witness #2 stated he was at the address in the living room with witness #1 when he heard Lindsey and the victim arguing. Witness #1 and #2 went into the southeast bedroom where the victim and Lindsey were arguing. Witness #2 stated Lindsey told him the victim owed him money. Witness #2 stated the victim started punching Lindsey. Witness #2 stated as witness #1 was separating the victim and Lindsey, witness #2 heard one gunshot. Witness #2 stated he then heard a second shot and observed the victim fall to the floor. Witness #2 stated he also observed Lindsey holding a black or blue steel revolver. Witness #2 stated he and witness #1 then went back into the living room at which time witness #1 called the Police. The #2 witness further stated Lindsey left the residence.

Witness #3 was contacted and stated the following: She was sitting in the master bedroom with some acquaintances when she heard an argument between 2 subjects. Witness #3 exited the bedroom and observed the

PROBABLE CAUSE STATEMENT FORM

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victim arguing with **Lindsey**. Witness #3 returned to the bedroom and stated she could tell the argument escalated to a physical confrontation because she could hear glass breaking. Witness #3 stated she then heard 2 gunshots and when she exited her bedroom she observed the victim lying in the bedroom across from the one she was in and observed blood on his chest. Witness #3 was shown a single photograph of **Lindsey** and identified him as the individual she observed arguing with the victim.

On 05/15/2016, **Lindsey** was contacted by detectives. **Lindsey** was advised of his Miranda Rights via the Miranda Waiver Form. **Lindsey** agreed to speak to detectives. **Lindsey** stated he was at 7206 Olive St, Kansas City, Jackson County, Missouri. The victim approached **Lindsey** in his bedroom to purchase a small amount of Marijuana from **Lindsey**. The victim began arguing with **Lindsey** about the price of the Marijuana, **Lindsey** was selling. The victim threw a punch at **Lindsey** and **Lindsey** dodged the punch, however it caused **Lindsey** to fall to the ground. **Lindsey** got up and punched the victim 3 times. The victim pushed **Lindsey** down on the ground. As **Lindsey** was getting to his feet (mad at the victim) he pulled a revolver handgun from his right pants pocket that was previously concealed and pointed it at the victim. **Lindsey** pulled the trigger 3 times; however the bullets would not fire. When he pulled the trigger a 4th time the bullet discharged striking the victim. **Lindsey** then fired two more times at the victim. **Lindsey** took the victim's cell phone and fled the scene. **Lindsey** threw his cell phone and the victim's cell phone on the side of 71 Hwy somewhere in the "50's". **Lindsey** threw his pistol in the Missouri river from the Broadway Bridge. **Lindsey** threw the clothing he was wearing onto the side of the Broadway Bridge.

Printed Name Det. Joe Nelson #4964 Signature Det [Signature] 4964

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

Judge

Circuit Court of _____ County, State of Missouri.