

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

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| POLICE NO. : | KC20024753 |
| PROSECUTOR NO. : | 095458766 |
| OCN: | |

| | | |
|------------------------------|---|-------------------------|
| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| |) | |
| IVAN D MOCK |) | |
| 908 North 70th Street |) | CASE NO. 2016-CR |
| Kansas City, KS 66112 |) | DIVISION |
| DOB: 01/27/1987 |) | |
| Race/Sex: B/M |) | |
| |) | |
| |) | DEFENDANT. |

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 April 12, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Daniel L Washington caused the death of Daniel L Washington 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.

Defendant is given further notice that should the State submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Daniel L. Washington as a result of the perpetration of the felony of Unlawful Use of a Weapon resulting in injury or death.

State vs. Ivan D Mock

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 April 12, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree, charged in Count I, 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.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145299.)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class A Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about April 12, 2020, at 4028 Agnes Ave, in the County of Jackson, State of Missouri, the defendant knowingly shot a firearm at a motor vehicle, a white GMC Yukon, and as a result of the above described conduct, Daniel L. Washington suffered injury or death.

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 IV. Armed Criminal Action (571.015-001Y19755299.)

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 April 12, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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 statement(s) of facts filed contemporaneously herewith, 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/ Jordan L. Logan
Jordan L. Logan (#63975)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor

State vs. Ivan D Mock

Kansas City, MO 64106
(816) 881-3532
JLLogan@jacksongov.org

WITNESSES:

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. [REDACTED]
3. [REDACTED]
- MO 64106
4. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
5. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
6. DET Timothy R. Taylor, 1125 Locust, Kansas City, MO 64106
7. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106
8. Daniel L Washington, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
9. [REDACTED]
- 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/12/2020

CRN: 20-24753

I, Detective Ilinca Rusnac #5741, of the 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 04/12/2020, at 4028 Agnes Av in
(Date) (Address)

Kansas City, Jackson Missouri Ivan D. Mock
(County) (Name of Offender(s))

R:B S:M DOB: 01/27/1987 [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 04/12/2020 at 0308 hours, Officers of the Kansas City, Missouri Police Department were dispatched to the intersection of E 39th St and Main St, **Kansas City, Jackson County MO**, in regard to a shooting. Upon arrival they located a white GMC Yukon KS 604MDH VIN 1GKEK13T51R172750 in the CVS parking lot (3902 Main St) with an apparent shooting victim in the front passenger seat. KCFD Medic 19 arrived on scene at 0316 hours and pronounced the party deceased.

Three witnesses were present at the scene and transported to police headquarters where they provided formal statements.

Witness [REDACTED] advised that she and the Victim have children together and they have maintained a close friendship without being romantically involved. On the evening of 04/11/2020, [REDACTED] picked up the Victim, his brother [REDACTED] and [REDACTED]'s girlfriend, [REDACTED] from [REDACTED]'s house at 2711 Roswell Av, Kansas City, Kansas. From there, the four drove to the Victim and [REDACTED]'s mother's house at 353 Quindaro Bl, Knasas City Kansas, where the Victim and his brother helped their mother out with a car related issue. After that, the four of them started to just drive around until they got to [REDACTED]'s house at **4028 Agnes, Kansas City, Jackson County MO**. Shortly after [REDACTED] stopped her vehicle in front of her residence, she observed her current boyfriend, **Ivan D. Mock** walk over to her driver door and proceed to open it from the outside. He then reached in as if to hug [REDACTED] He then noticed the other three occupants and stated "oh, y'all here." **Mock** then reached into the front pocket of his hooded sweatshirt, pulled out a black handgun and shot several times, striking the Victim who was sitting in the front passenger seat. [REDACTED] then drove away from the scene trying to find an area hospital. She then observed a KCPD patrol wagon in the area of E 39th St and Main and pulled in to the CVS parking lot where she flagged the officer down.

[REDACTED] also stated that she had no idea **Mock** was anywhere around her residence. He had called and texted her earlier in the day but [REDACTED] did not reply to him. This appeared to have upset **Mock** because around 2300 hours, **Mock** sent her more text messages, two of which read "Keep playing. Pull up game."

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When asked what "Pull up game" meant, [REDACTED] explained that it meant he knew that she had to have been at her friend's (Witness [REDACTED]) house and he was going to "pull up" show up there. [REDACTED] did not respond to those text messages either.

Due to her familiarity to both the Victim and **Mock**, [REDACTED] was shown individual photographs of both males, which she positively identified.

Although [REDACTED] did not discuss this with the interviewing Detective, while [REDACTED] was inside the interview room she spoke on the phone with an unknown party and told said party that her boyfriend killed her baby daddy and best friend. The details she provided were the same as what she told Detectives, however, she also repeated to the party on the other line that she "was not messing around with Daniel" referring to the Victim. She added during the same phone conversation that **Mock** continuously accused her of cheating on him with the Victim and that **Mock** was always suspicious and did not like the fact that [REDACTED] still had an ongoing relationship with the Victim.

Witness [REDACTED] advised that he, his girlfriend (Witness [REDACTED] and the Victim were at his girlfriend, [REDACTED]'s house all day working when [REDACTED] arrived later in the evening. The four of them began hanging out and drinking in front of the house. When it started raining, the four of them decided to get into [REDACTED]'s white GMC Yukon and start driving around. They eventually drove to [REDACTED]'s house and parked in front of it. [REDACTED] observed **Mock** walk over to the vehicle from somewhere around the residence and walk over to the driver door. According to [REDACTED], **Mock** opened the driver door and began to hug [REDACTED]. [REDACTED] said "what's up" to the **Mock** to which **Mock** replied "oh, y'all in here." [REDACTED] then observed **Mock** pull out a handgun from his hooded sweatshirt pocket and fire into the vehicle striking the Victim. They drove away from the scene until they flagged down an officer in the area of E 39th St and Main St. [REDACTED] picked **Mock** out of a line-up.

Witness [REDACTED] stated that she was at her house with [REDACTED] and the Victim until [REDACTED] arrived later in the evening. They all drove over to [REDACTED] and the Victim's mother's house to raise the windows on her vehicle because the rain was approaching. The four of them then began riding around in the car until they parked in front of [REDACTED]'s house. Only a few minutes after being parked in front of the house, [REDACTED] saw someone walking around their vehicle and to the driver door. [REDACTED] recognized the person to be **Mock**, [REDACTED]'s current boyfriend. [REDACTED] observed **Mock** open the driver door and reach inside the vehicle as if to hug [REDACTED]. [REDACTED] then saw **Mock** retrieve a handgun from his hoodie and shoot inside the vehicle. [REDACTED] picked **Mock** out of a line-up.

A total of five .40 caliber shell casings, all bearing the same head stamp were recovered during this investigation. Two of the casings were collected from inside the vehicle the Victim was shot in and three casings were collected from the ground in front of 4028 Agnes by where the driver door of [REDACTED]'s vehicle was while parked in front of the house at the time of the shooting. This is consistent with a shooter standing in the open doorway of a stationary vehicle with the arm holding the firearm reaching into the vehicle and then backing away from the vehicle while continuing to shoot.

The Victim was the only party inside the vehicle who was struck by bullets with a total of five defects. All of the defects to the Victim were to the left side of his body. Three projectiles were recovered from the Victim by the Medical Examiner's Office. Two other projectiles were determined to have traveled through the front passenger seat. One of the two aforementioned projectiles exited the vehicle through the rear right

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passenger door, just behind the B pillar. The second projectile left a defect to the inside of the B pillar but did not exit the vehicle and was recovered during vehicle processing.

Printed Name Detective Ilinca Rusnac #5741 Signature /s/ Detective Rusnac #5741

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

Judge

Circuit Court of _____ County, State of Missouri.