

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

<b>POLICE NO. :</b>	KC20043363
<b>PROSECUTOR NO. :</b>	095459781
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>TERRY L WILLIAMS</b>	)	
<b>6319 E 127th Street</b>	)	<b>CASE NO. 2016-CR</b>
<b>Grandview, MO 64030</b>	)	<b>DIVISION</b>
<b>DOB: 04/07/1991</b>	)	
<b>Race/Sex: B/M</b>	)	
<b>S.S.N.: XXX-XX-3660</b>	)	
	)	<b>DEFENDANT.</b>

**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 June 30, 2020, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, and with the purpose of causing serious physical injury to Quindell Burrell, caused the death of Quindell Burrell by shooting him.

**OR IN THE ALTERNATIVE**

**Count I. Murder 2<sup>nd</sup> Degree (565.021-003Y19804903.0)**

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 June 30, 2020, in the County of Jackson, State of Missouri, Quindell Burrell was killed by being shot as a result of the perpetration of the violation of Section 579.030, RSMo, the class B felony of attempted distribution of a

## **State vs. Terry L Williams**

controlled substance in a protected location, committed by the defendant on or about June 30, 2020, in the County of Jackson, State of Missouri.

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, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.2, RSMo, in that on or about June 30, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree as charged in Count I, all allegations of which are incorporated here by reference, and the defendant, acting alone or purposefully in concert with another, committed the foregoing felony of Murder in the Second Degree by, with and through, the knowing use, assistance and aid of a deadly weapon, and on or about August 28th of 2012, in Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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. Attempted Distribution Of A Controlled Substance In A Protected Location (579.030-001Y20173530.1)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.030, RSMo,

**State vs. Terry L Williams**

committed the class B felony of attempted distribution of a controlled substance in a protected location, punishable upon conviction under Section 558.011, RSMo, in that on or about June 30, 2020, in the County of Jackson, State of Missouri, the defendant knowingly agreed to meet Quindell Burrell at Ruskin Way Park, a public park, for the purpose of delivering crack-cocaine to Quindell Burrell, and did meet Quindell Burrell at Ruskin Way Park, and such action constituted a substantial step toward the commission of the class A felony of distribution of a controlled substance in a protected location, and was done for purpose of committing that offense.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five(5) years and not to exceed ten (10) years.

**Count IV. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about June 30, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 40 caliber handgun, a firearm, and on or about August 28th of 2012 , the defendant was convicted of the felony of Armed Criminal Action in the Circuit Court of Jackson County, Missouri.

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 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/ P. Benjamin Cox*  
P. Benjamin Cox (#60757)  
Assistant Prosecuting Attorney

**State vs. Terry L Williams**

415 E. 12th St., Fl 7M  
Kansas City, MO 64106  
(816) 881-3975  
BCox@jacksongov.org

**WITNESSES:**

1. [REDACTED]  
64106
2. Quindell Burrell, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO  
64106
3. [REDACTED]  
64106
4. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
5. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
6. [REDACTED] E 12th St, Floor 11, Kansas City, MO 64106
7. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
8. [REDACTED] E 12th St, Floor 11, Kansas City, MO  
64106
9. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
10. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
11. [REDACTED] City, MO  
64106
12. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
13. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] Bradley N Thomas, 1125 Locust, Kansas City, MO 64106
16. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

## PROBABLE CAUSE STATEMENT FORM

Date: 07/02/20

CRN: 20-043363

I, Detective Brad Thomas #3971, 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 06/30/20, at E. 113<sup>th</sup> Terrace and Ruskin Way in  
(Date) (Address)

Kansas City, Jackson Missouri Terry L. Williams  
(County) (Name of Offender(s))

B/M, 04/07/91, 6'03/160, Bk/Bn committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 06/30/2020 at approximately 2010 hours officers of the Kansas City, Missouri Police Department were dispatched to 11201 Eastern Ave., Kansas City, Jackson County, Missouri in regard to a shooting. Upon arrival officers located the victim just south of the intersection of **E. 113th Terrace and Ruskin Way, Kansas City, Jackson County, Missouri**. Life saving measures were undertaken but the victim succumbed to his injuries and was declared deceased at the scene. A murder investigation was initiated.

At the crime scene a spent shell casing was located in close proximity to the victim bearing head stamp "WIN 40 S&W". In addition a live round was located between the victim's legs bearing the same head stamp.

Witness 1 was at the scene and provided a formal statement to detectives. Witness 1 said she and the victim went to the park at E. 113th Terrace and Ruskin Way to meet suspect 1, **Terry Williams** and suspect 2, Tyree Williams to purchase cocaine. Witness 1 knows both **Terry Williams** and Tyree Williams. When they arrived witness 1 said **Terry Williams** was the sole occupant and driver of a green SUV she referred to as a Yukon. Tyree Williams was the driver and sole occupant of a dark colored Chrysler 200. Police data bases link **Terry Williams** to a green Chevy Tahoe bearing Missouri license# RE8-C7J. Witness 1 stated Tyree Williams just bought a Chrysler 200 for his significant other.

Witness 1 said the victim exited her vehicle and approached the suspect vehicles. He tried to enter the vehicles but they pulled away so the victim came back to witness 1's vehicle. The suspects backed their vehicles back into the same parking spots they had been in previously and the victim went back over to the suspects. Witness 1 drove off to go to the store and was supposed to return to pick the victim up. When witness 1 returned she discovered the victim had been killed. At that time, Witness contacted Tyree Williams via cell phone and spoke with him briefly.

Witness 1 described Tyree Williams as being the little brother of **Terry Williams**; the two of them have the same father. Witness 1 said Terry's father manufactures crack-cocaine while Tyree and **Terry Williams** sell it to

## PROBABLE CAUSE STATEMENT FORM

CRN 20-043363

people, who like the victim, then resale it for a profit. However, each of them, Tyree and **Terry**, also have those they sell to who are users of the crack-cocaine. Witness 1 said **Terry** has his own territory and people designated as his clients/area while Tyree has his own territory and people designated as his clients/area. Witness 1 said Tyree is typically the driver during drug transactions when the victim "reups" from **Terry** and is always armed with a firearm while **Terry** is typically the passenger of Tyree's vehicle. Witness 1 said she has never seen **Terry** armed with a firearm during the drug transactions, but knows Tyree is always armed with a handgun he carries on his hip, in a holster purchased for him by the victim. Witness 1 said her personal belief based off her frequent contact and close relationship with Tyree and **Terry** is that Tyree was well aware a drug transaction was going to occur with the victim.

Surveillance video from the area was obtained and reviewed by detectives. The video corroborates witness 1's statement in so much as there is a green SUV and dark colored sedan backed into the parking spaces in close proximity to one another. The green SUV looks to be a Chevy Tahoe and the dark colored sedan looks to be a Chrysler product. The video shows **Terry Williams** exit the driver's door of the SUV, extend his arm in a shooting position and the victim disappears in between the two vehicles out of view. It appears **Terry Williams** then physically assaults the victim. In addition the video shows Tyree Williams exit the sedan and he does not look to have a firearm. Tyree Williams can be seen standing at the rear bumper of the Chrysler sedan as the victim is killed.

The area where **Terry Williams** and Tyree Williams were conducting the drug transaction is a public park (Ruskin Way Park).

License plate readers in close proximity to the crime scene read **Terry Williams** Chevy Tahoe Missouri license# RE8-C7J on 06/30/20 at 2014 hours, four minutes after officers were dispatched on the shooting.

The Chrysler product vehicle was located by detectives of the Kansas City, Missouri Police Department and both **Terry Williams** (front passenger) and Tyree Williams (driver) were observed to be in the vehicle. They attempted to stop the vehicle and when it failed to stop a vehicle pursuit was initiated. A Tactical Vehicle Containment technique was utilized to effectively stop the vehicle in the area of 109th Terrace and Hickman Mills Drive, Kansas City, Jackson County, Missouri. An Officer observed Tyree Williams exit the driver's side door and throw several items into the air. The Officer also heard what sounded like metal hitting the pavement as he observed Tyree Williams empty his hands. Upon inspection of the area, the Officer discovered 2 plastic baggies, one containing 11 grams of a beige rock-like substance which was later field tested using a Scotts Reagent System. The field test kit showed a positive reaction to the presence of cocaine. The second bag contained 1 gram of green leafy substance which was field tested using a Duquenois-Levine Reagent test kit showing a positive reaction to THC. A 9mm firearm was located under the vehicle and recovered. In plain view in the driver's side floor board a second, 40 caliber firearm, was observed. **Terry Williams** exited the vehicle on the driver's side door after given orders by Officers to leave the passenger seat. The vehicle was towed to 7760 E. Front Street, Kansas City, Jackson County, Missouri and secured in the Vehicle Processing Facility to be processed for evidence.

**Terry Williams** was arrested and transported to a police facility for questioning. After being advised of his Miranda Warning **Terry Williams** chose to remain silent and made no statement.

**PROBABLE CAUSE STATEMENT FORM**

CRN 20-043363

On 07/02/20 a search warrant was obtained and executed on the Chrysler 200. The firearm located in the driver's side floor board was observed to be a Springfield .40 caliber semi-auto with a live round in the chamber. Also located in the vehicle was 2 baggies of a green leafy substance and a bullet that had been shot into the rear quarter passenger side quarter panel of the vehicle at an unknown time.

A computer check showed Terry Williams is a convicted felon for Possession of a Controlled Substance (conviction date 01/2011) and subsequent felony convictions for Possession of a firearm, Robbery Second Degree and Felonious Restraint (conviction date of 08/2012). In addition Terry Williams was convicted of Armed Criminal Action in Jackson County, Missouri on case# 1116CR0497301 on 08/28/2012. He is prohibited by law from possessing a firearm.

Lab results for items of evidence are pending.

Printed Name Det. Brad Thomas 33971 Signature /s/ Det Brad Thomas 3971

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**

<b>POLICE NO. :</b>	KC20043363
<b>PROSECUTOR NO. :</b>	095459775
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>TYREE L WILLIAMS</b>	)	
<b>3506 E 106th Terrace</b>	)	<b>CASE NO. 2016-CR</b>
<b>Kansas City, MO 64137</b>	)	<b>DIVISION</b>
<b>DOB: 08/03/1999</b>	)	
<b>Race/Sex: B/M</b>	)	
<b>[REDACTED]</b>	)	
	)	<b>DEFENDANT.</b>

**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 June 30, 2020, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, and with the purpose of causing serious physical injury to Quindell Burrell, caused the death of Quindell Burrell by shooting him.

**OR IN THE ALTERNATIVE**

**Count I. Murder 2<sup>nd</sup> Degree (565.021-003Y19804903.0)**

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 June 30, 2020, in the County of Jackson, State of Missouri, Quindell Burrell was killed by being shot as a result of the perpetration of the violation of Section 579.030, RSMo, the class B felony of attempted



## **State vs. Tyree L Williams**

distribution of a controlled substance in a protected location, committed by the defendant on or about June 30, 2020, in the County of Jackson, State of Missouri.

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, 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 30, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree as charged in Count I, all allegations of which are incorporated here by reference, and the defendant, acting alone or purposefully in concert with another, 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. Attempted Distribution Of A Controlled Substance In A Protected Location (579.030-001Y20173530.1)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.030, RSMo, committed the class B felony of attempted distribution of a controlled substance in a protected location, punishable upon conviction under Section 558.011, RSMo, in that on or about June 30, 2020, in the County of Jackson, State of Missouri, the defendant, acting alone

## State vs. Tyree L Williams

or purposefully in concert with another, knowingly agreed to meet Quindell Burrell at Ruskin Way Park, a public park, for the purpose of delivering crack-cocaine to Quindell Burrell, and did meet Quindell Burrell at Ruskin Way Park, and such action constituted a substantial step toward the commission of the class A felony of distribution of a controlled substance in a protected location, and was done for purpose of committing that offense.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five(5) years and not to exceed ten (10) years.

### **Count IV. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20174801.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting an arrest**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 1, 2020, in the County of Jackson, State of Missouri, law enforcement officers, were making an arrest of defendant for Murder in the 2nd Degree, and the defendant reasonably should have known that the officers were making an arrest, and, for the purpose of preventing the officers from effecting the arrest, resisted the arrest of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant struck a pursuing detective's vehicle and continued to flee and elude the officers.

The range of punishment for a class E 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 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.

### **Count V. Possession Of Controlled Substance Except 35 Grams Or Less Of Marijuana/synthetic Cannabinoid (579.015-001Y20173532.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.015, RSMo, committed the **class D felony of possession of a controlled substance**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 1, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed crack cocaine, a controlled substance, knowing of its presence and nature.

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

**State vs. Tyree L Williams**

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 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/ P. Benjamin Cox*  
P. Benjamin Cox (#60757)  
Assistant Prosecuting Attorney  
415 E. 12th St., Fl 7M  
Kansas City, MO 64106  
(816) 881-3975  
BCox@jacksongov.org

**WITNESSES:**

1. [REDACTED]. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. Quindell Burrell, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. [REDACTED] City, MO 64106
4. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
5. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
6. [REDACTED], MO 64106
7. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
8. [REDACTED] 64106
9. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
10. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
11. [REDACTED], MO 64106
12. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
13. [REDACTED] 64106

**State vs. Tyree L Williams**

14. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO  
64106
15. DET Bradley N Thomas, 1125 Locust, Kansas City, MO 64106
16. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 07/02/20

CRN: 20-043363

I, Detective Brad Thomas #3971, 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 06/30/2020, at E. 113th Terrace and Ruskin Way in  
(Date) (Address)

Kansas City, Jackson Missouri Tyree L. Williams  
(County) (Name of Offender(s))

B/M, 08/03/99, 5'10/140, Bk/Bn committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 06/30/2020 at approximately 2010 hours officers of the Kansas City, Missouri Police Department were dispatched to 11201 Eastern Ave., Kansas City, Jackson County, Missouri in regard to a shooting. Upon arrival officers located the victim just south of the intersection of E. 113th Terrace and Ruskin Way, Kansas City, Jackson County, Missouri. Life saving measures were undertaken but the victim succumbed to his injuries and was declared deceased at the scene. A murder investigation was initiated.

At the crime scene a spent shell casing was located in close proximity to the victim bearing head stamp "WIN 40 S&W". In addition a live round was located between the victim's legs bearing the same head stamp.

Witness 1 was at the scene and provided a formal statement to detectives. Witness 1 said she and the victim went to the park at E. 113th Terrace and Ruskin Way to meet suspect 1, Terry Williams and suspect 2, **Tyree Williams** to purchase cocaine. Witness 1 knows both Terry Williams and **Tyree Williams**. When they arrived witness 1 said Terry Williams was the sole occupant and driver of a green SUV she referred to as a Yukon. **Tyree Williams** was the driver and sole occupant of a dark colored Chrysler 200. Police data bases link Terry Williams to a green Chevy Tahoe bearing Missouri license# RE8-C7J. Witness 1 stated **Tyree Williams** just bought a Chrysler 200 for his significant other.

Witness 1 said the victim exited her vehicle and approached the suspect vehicles. He tried to enter the vehicles but they pulled away so the victim came back to witness 1's vehicle. The suspects backed their vehicles back into the same parking spots they had been in previously and the victim went back over to the suspects. Witness 1 drove off to go to the store and was supposed to return to pick the victim up. When witness 1 returned she discovered the victim had been killed. At that time, Witness contacted Tyree Williams via cell phone and spoke with him briefly.

Witness 1 described **Tyree Williams** as being the little brother of Terry Williams; the two of them have the same father. Witness 1 said Tyree's father manufactures crack-cocaine while Tyree and Terry sell it to people, who

## PROBABLE CAUSE STATEMENT FORM

CRN 20-043363

like the victim, then resale it for a profit. However, each of them, Tyree and Terry, also have those they sell to who are users of the crack-cocaine. Witness 1 said Tyree has his own territory and people designated as his clients/area while Terry has his own territory and people designated as his clients/area. Witness 1 said Tyree is typically the driver during drug transactions when the victim "reups" and is always armed with a firearm while Terry is typically the passenger of Tyree's vehicle. Witness 1 said she has never seen Terry armed with a firearm during the drug transactions, but knows Tyree is always armed with a handgun he carries on his hip, in a holster purchased for him by the victim. Witness 1 said her personal belief based off her frequent contact and close relationship with Tyree and Terry is that Tyree was well aware a drug transaction was going to occur with the victim.

Surveillance video from the area was obtained and reviewed by detectives. The video corroborates witness 1's statement in so much as there is a green SUV and dark colored sedan backed into the parking spaces in close proximity to one another. The green SUV looks to be a Chevy Tahoe and the dark colored sedan looks to be a Chrysler product. The video shows Terry Williams exit the driver's door of the SUV, extend his arm in a shooting position and the victim disappears in between the two vehicles out of view. It appears Terry Williams then physically assaults the victim. In addition the video shows **Tyree Williams** exit the sedan and he does not look to have a firearm. **Tyree Williams** can be seen standing at the rear bumper of the Chrysler sedan as the victim is killed.

The area where Terry Williams and **Tyree Williams** were conducting the drug transaction is a public park (Ruskin Way Park).

The Chrysler product vehicle was located by detectives of the Kansas City, Missouri Police Department and both Terry Williams (front passenger) and **Tyree Williams** (driver) were observed to be in the vehicle. They attempted to stop the vehicle and when it failed to stop a vehicle pursuit was initiated. During the pursuit **Tyree Williams** struck a pursuing detectives vehicle and continued to flee and elude the officers. The manner in which **Tyree Williams** was operating his vehicle placed the public at large in danger. A Tactical Vehicle Containment technique was utilized to effectively stop the vehicle in the area of 109th Terrace and Hickman Mills Drive, Kansas City, Jackson County, Missouri. An Officer observed **Tyree Williams** exit the driver's side door and throw several items into the air. The Officer also heard what sounded like metal hitting the pavement as he observed **Tyree Williams** empty his hands. Upon inspection of the area, the Officer discovered 2 plastic baggies, one containing 11 grams of a beige rock-like substance which was later field tested using a Scotts Reagent System. The field test kit showed a positive reaction to the presence of cocaine. The second bag contained 1 gram of green leafy substance which was field tested using a Duquenois-Levine Reagent test kit showing a positive reaction to THC. A 9mm firearm was located under the vehicle and recovered. In plain view in the driver's side floor board a second, 40 caliber firearm, was observed. The vehicle was towed to 7760 E. Front Street, Kansas City, Jackson County, Missouri and secured in the Vehicle Processing Facility to be processed for evidence.

**Tyree Williams** was arrested and transported to a police facility for questioning. After being advised of his Miranda Warning **Tyree Williams** invoked his right to a lawyer and did not provide a statement.

**PROBABLE CAUSE STATEMENT FORM**

CRN 20-043363

On 07/02/20 a search warrant was obtained and executed on the Chrysler 200. The firearm located in the driver's side floor board was observed to be a Springfield .40 caliber semi-auto with a live round in the chamber. Also located in the vehicle was 2 baggies of a green leafy substance and a bullet that had been shot into the rear quarter passenger side quarter panel of the vehicle at an unknown time.

Lab results for items of evidence are pending.

Printed Name Det Brad Thomas 3971 Signature /s/ Det Brad Thomas 3971

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

\_\_\_\_\_  
Judge

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