

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

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|-------------------------|------------|
| POLICE NO. : | KC20042869 |
| PROSECUTOR NO. : | 095460294 |
| OCN: | |

| | | |
|------------------------------|---|-------------------------|
| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| |) | |
| RYSON ELLIS |) | |
| 2304 Drury Ave |) | CASE NO. 2016-CR |
| Kansas City, MO 64124 |) | DIVISION |
| DOB: 07/21/1998 |) | |
| Race/Sex: B/M |) | |
| |) | |
| |) | DEFENDANT. |

COMPLAINT
WARRANT REQUESTED

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.0)**

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 29, 2020, in the County of Jackson, State of Missouri, Legend M Taliferro was killed by being shot as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030 RSMo, committed by the defendant on or about June 29, 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.

State vs. Ryson Ellis

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 29, 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 (571.030-015Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, 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 June 29, 2020, at 1642 Bushman Drive, Apt. #123, in the County of Jackson, State of Missouri, the defendant, knowingly discharged or shot a firearm at a habitable structure, and as a result of the above described conduct, Legend M. Taliferro suffered 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 (571.015-001Y19755213.0)

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 29, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of weapons charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of weapons 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/ Jennifer S Tatum
Jennifer S Tatum (#70789)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M

State vs. Ryson Ellis

Kansas City, MO 64106
(816) 881-3628
jtatum@jacksongov.org

WITNESSES:

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

PROBABLE CAUSE STATEMENT FORM

Date: 08/12/2020

CRN: KC20042869

I, Detective Danny Thomas #4933
(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 06/29/2020, at 1642 Bushman Drive #123 in
(Date) (Address)

Kansas City, Jackson Missouri Ryson B. Ellis
(County) (Name of Offender(s))

black male, 07/21/1998 committed one or more criminal offense(s).
(Description of Identity)

Murder/ACA/Aggravated Assault

The facts supporting this belief are as follows:

On 06/29/2020 at approximately 0236 hours, officers of the Kansas City, Missouri Police Department were dispatched to 1642 Bushman Drive Apartment #123, Kansas City, Jackson County, Missouri, in regard to a shooting. While in route the officers were advised by dispatch that the shooting victim (a young child) had been transported to an area hospital, where he was eventually pronounced dead from his injuries. The case was ruled a homicide.

During the course of the investigation it was determined the suspect fired bullets into 1642 Bushman Drive, Apartment #123 from a grassy area behind the structure. The bullets were fired through a wood privacy fence, sliding glass doors behind the fence and vertical blinds covering the sliding glass doors. It was determined the victim had been asleep on the floor inside the apartment when he was struck. A witness in the parking lot provided a description of the suspect, stating he had a "fade cut" and facial hair on his chin. This description of the suspect, matches the general description of Ryson B. Ellis, black male, 07/21/1998.

A female witness was interviewed and stated the following: She was asleep on the couch inside the residence when the shooting occurred. She advised she has a son with an individual named, Ryson B. Ellis. She provided his Facebook profile as, <https://www.facebook.com/ryson.shelton>.

She also provided a gmail account for Ellis of: tonyttop@gmail.com (later discovered to be tonyttop730@gmail.com).

The witness stated on 06/23/2020, Ellis assaulted her by striking her in the head at their residence in Kansas City. Ellis then "yanked" the baby (not the homicide victim) out of her arms and left.

The witness told her mother and brothers about the incident. Her brothers subsequently responded to 2304 Drury Avenue (Kansas City) where Ellis was staying with his brother (), to confront him about assaulting the witness. One of these brothers is the father of the homicide victim, and he resided at 1642

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Bushman, apartment #123. An altercation ensued between Ellis and the witness's brothers. During this altercation Ellis was injured. Ellis' mother subsequently retrieved a long gun and threatened them. The witness grabbed her son and the family left.

The witness stated she had been staying with her mother at 1642 Bushman Drive Apartment #123 since the incident, out of fear that Ellis would harm her. She stated she filed a report in regard to the incident and has also filed for an ex-parte against Ellis. The witness provided Facebook messages she received from Ellis following the domestic violence incident. One of the messages asked the witness where her brother was and for her to "pop out." Another message was a, "scary" emoji followed by three talking emoji's. The witness stated the messages she received were from Facebook profile, <https://www.facebook.com/ryson.shelton.7>.

In addition the witness received text messages from Ellis' mother (913-318-2505), a portion of which read, "You motherfuckers better be glad that gun was on safety cuz just imagine somebody would have been dead who goes to people's house like that y'all fight all the f*****time now you want to put your peoples in it now it's not a game just understand that everything is over i guess y'all thought y'all came by surprise but ain't going to be no surprise like our surprise we know your brothers or sisters or whoever the f***we know your people's names we know where your mama stay but it's okay its okay gotcha."

Following the murder, numerous TIPS have been received by the police department naming Ryson Ellis as the suspect.

Records from the Facebook account of Ryson Ellis were obtained. A message authored by Ellis dated 06/25/2020 was discovered which read: "Bro that's what I'm saying if Red mad aboutthis idk wtf imma do cause ain't no stopping what he gone do but I don't want it to be like that." That message was in reference to "Red's" potential response to the incident described at 2304 Drury.

Surveillance video was obtained from the crime scene. It depicts a suspect vehicle with at least two occupants.

During the course of the investigation, [REDACTED] was contacted and subsequently provided information pertinent to the case. [REDACTED] stated the vehicle involved in the homicide was a rental vehicle. She sent the following text message to detectives: "The rental car was not taken back on that day the third person had it her name is [REDACTED]." When asked for further information about [REDACTED], [REDACTED] stated she knew [REDACTED]'s dad was just released from a long prison sentence. A computer search later revealed [REDACTED] B/F [REDACTED], [REDACTED] whose father was released from prison in April 2020 after serving 31 years on a 500+ month conviction.

A limited online search of Enterprise Rent-A-Car records revealed [REDACTED] rented a Ford Fusion bearing MO license plates ZC6B2A from the Kansas City Midtown location (3543 Main St, KCMO 64111) on 06/23/2020 and returned the vehicle on 07/03/2020. The time frame of the rental and return puts the vehicle in [REDACTED]'s possession at the time of the homicide and returned 4 days after the homicide as described by [REDACTED].

A computer search of ZC6B2A revealed the vehicle as a 2019 Ford Fusion bearing VIN: 3FA6P0LU2KR180787, registered to EAN Holdings LLC, 3445 South Noland Rd, Independence, MO 64055.

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A search in the ALPR system of ZC6B2A revealed the Ford Fusion hit various ALPR Readers during the time frame of 06/23/2020 and 07/03/2020.

On 08/11/2020, [REDACTED] was arrested and questioned. During questioning she asked for an attorney. Her attorney responded and she later agreed to provide a statement, with her attorney present.

During her statement, [REDACTED] stated she had a rental car from 06/23/2020 through 07/03/2020. She stated on the night of the murder she had a party at her residence. After the party, she, [REDACTED] and Ryson Ellis went to the Rendezvous Lounge located at 11816 Blue Ridge Boulevard in the above listed vehicle.

After they left the Rendezvous Lounge, Ellis asked if she could take him to Citadel Apartments. Since it was on the way home she agreed. She stated she drove to the Apartment Complex and Ellis exited the vehicle. A short time later she heard gunshots and Ellis came running back to the vehicle. She stated when he got back into the vehicle she heard a gun hit the floor. She stated she pulled off and drove northbound on Paseo. She stated she drove to her residence, went inside and left [REDACTED] and Ellis outside. [REDACTED] stated she hasn't been in contact with them since and didn't find out until later someone had been killed.

During the interview [REDACTED] was shown a single photograph of Ryson B. Ellis, black male, 07/21/1998. She confirmed the photograph was the Ryson she had been speaking about.

Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

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

Judge

Circuit Court of _____ County, State of Missouri.