

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	20-052583
PROSECUTOR NO. :	095460507
OCN:	qo003966

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ISAIAH I WOODS-MILLER)	
3906 Baltimore Ave, #703)	CASE NO. 2016-CR
Kansas City, MO 64111)	DIVISION
DOB: 01/02/2003)	
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 August 13, 2020, in the County of Jackson, State of Missouri, Shonay Persinger was killed by being shot as a result of the attempted perpetration of the class B felony of Attempted Robbery in the First Degree under Section 570.023, RSMo committed by the defendant on or about August 13, 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. Isaiah I Woods-Miller

Count II. Attempted Robbery - 1st Degree (570.023-001Y20171207.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 13, 2020, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, tried to forcibly steal U.S. Currency in the possession of Shonay Persinger, and such conduct was a substantial step toward the commission of the offense of Robbery in the First Degree, and was done for the purpose of committing such Robbery in the First Degree, and in the course thereof another participant in the offense was armed with a deadly weapon.

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 up to fifteen (15) years.

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/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4488
hwilliams@jacksongov.org

WITNESSES:

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. PO Gabriel Coale, 223 N. Memorial Drive, Independence, MO 64050
3. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050
4. PO Galen McGinley, 223 N. Memorial Drive, Independence, MO 64050
5. PO Brian Weiter, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 8/27/2020

Report #: 2020-52583

I, Christopher Burris, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 8/13/2020, at about 2252 hours, Isaiah I. Woods-Miller., (Race- Black, Sex- Male, DOB- 01/02/2003, Address-3906 Baltimore Avenue, Apartment # 703, Kansas City, Missouri 64130, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 08/13/20 at approximately 2252 hours, Independence Police Officers were dispatched to 9330 East 16th Street, Independence, Jackson County, Missouri 64052 in reference to a shooting. Upon the arrival of officers, the victim, Shonay Persinger was located inside the residence, deceased with what appeared to be a single gunshot wound to her chest. A spent 40 caliber shell casing was located near the body of the victim.

A neighborhood canvas revealed a witness at [REDACTED] 16th Street. The witness [REDACTED], lives [REDACTED] [REDACTED] the victim's residence [REDACTED] observed 4 subjects wearing hooded jackets walking westbound at a quick rate. [REDACTED] then advised he observed a four door vehicle parked in front of his residence. [REDACTED] advised there was a subject in the driver's seat and the brake lights were lit up on the vehicle. Fall then observed the four subjects walk to the vehicle and get in. The vehicle then backed into a driveway and drove away eastbound on East 16th Street towards Arlington Avenue.

Throughout the course of the investigation, Ivory D. Alford was developed as a suspect. Evidence gleaned from the investigation established probable cause for an arrest.

On 08/26/2020, Alford was arrested on the stop order and subsequently interviewed twice after he was read his Miranda rights. During the first interview on 08/26/2020, Alford acknowledge he knew about the robbery but denied being present. On 08/27/2020, Alford was interviewed again and admitted that he set up the robbery at 9330 E. 16th Street to steal drugs and money. Alford identified four other accomplices, one being Isaiah I. Woods-Miller, B/M, DOB 01/02/2003. Alford advised he along with accomplices entered the residence after seeing the victim enter the residence. Alford denied shooting the victim. Alford confirmed that the victim's phone was thrown out near the intersection of 35th and Prospect Avenue. Alford gave consistent statements which matched the witness statements and evidence obtained from this investigation.

On 08/27/2020, Woods-Miller was arrested on a stop order and subsequently interviewed after he was read his Miranda. Woods-Miller confessed his involvement in the robbery. Woods-Miller admitted he was acting as the lookout during the robbery outside the residence, when he heard a shot. Woods-Miller advised he and the other accomplices got into the vehicle they arrived in and left the scene. Woods-Miller advised Alford shot the victim. Woods-Mille advised they did not get anything during the robbery attempt. Woods-Miller gave consistent statements which matched the witness statements, evidence obtained from this investigation.

Detective Christopher Burris # 1401

/S/ Christopher Burris

Print Name

Signature