


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

POLICE NO. :	
PROSECUTOR NO. :	095460911
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
KELSHAUN D. MOSELEY)	
3632 Bales Ave.)	CASE NO. 2016-CR
Kansas City, MO 64128)	DIVISION
DOB: 11/14/1991)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

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 September 24, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Keva Hill caused the death of Keva Hill by shooting her, and defendant is further given 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 Keva Hill as a result of the perpetration of the class A felony of Unlawful Use of a Weapon under Section 571.030, committed by defendant.

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.

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Count II. Armed Criminal Action (571.015-001Y20205299.0)

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 on or about September 24, 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.

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.

State vs. Kelshaun D. Moseley

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Joseph R. Van Amburg

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WITNESSES:

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. PO Jacob E Emig, 1125 Locust, Kansas City, MO 64106
3. Kelly E Gray, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. [REDACTED]
[REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. DET James H. Price, 1125 Locust, Kansas City, MO 64106
7. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
8. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09/24/2020

CRN: 20-65235

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 09/24/2020, at 5930 Agnes Ave in
(Date) (Address)

Kansas City, Jackson Missouri Kelshaun D. Moseley
(County) (Name of Offender(s))

R:B S:M DOB: 11/14/1991 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 09-24-2020 at 0355 hours, a Police Officer with the Kansas City Missouri Police department was working in an off-duty capacity at Research Medical Center. At that time, the Officer responded to the front civilian entrance of the emergency department where he made contact with Witness [redacted] and a male party later identified as **Kelshaun Moseley, b/m, 11/14/1991**.

Moseley told the Officer that he wanted to turn himself in. He was initially not forthcoming with details but did offer that “something happened” and that he had killed someone. When asked, he eventually provided the Officer with 5930 Agnes Av as the location of the crime.

The off duty Officer relayed the information over to police dispatchers, who then sent patrol officers to the address. Upon arrival, the responding Officers located the naked body of a black female who was bleeding from the head due to apparent gunshot trauma. The Victim did not show any signs of life and was pronounced deceased by KCFD Medic on scene.

Witness [redacted] stated that he was standing outside of his vehicle in the open parking lot of the emergency room entrance to Research Medical Center, cleaning his windows. When he looked up, he saw a black male with dreads, no shirt, visible red and black boxers and jeans walking towards him from the stairs to the south of the ER entrance. The male, later identified as **Moseley** walked over to [redacted] handed him a stack of ID’s and miscellaneous cards and told him to hold them for him because he was going to turn himself in. [redacted] stated that **Moseley** was very “hyper” and was speaking continuously during their very short interaction which lasted approximately 30 seconds. [redacted] said that what he could make out from what **Moseley** was saying was that **Moseley** muttered something that he believed sounded like “murder” then said something about his girlfriend setting him up and that people were coming for him. He then walked into the emergency room. [redacted] then saw **Moseley** coming back out of the hospital minutes later escorted by a uniformed officer as more police cars

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began pulling in to the hospital lot. ■ then made contact with one of the officers on scene and provided them with his account of what had occurred and handed them the cards **Moseley** had given him.

Witness ■ stated that she was working as a security guard for Research Medical Center at the patient check-in. At approximately 0350 hours, **Moseley** walked to the window and stated that he needed a mask. ■ asked **Moseley** why to which he replied that he needed to turn himself in. When she asked what for, **Moseley** offered "She set me up. Someone's dead." When ■ asked for more details, **Moseley** began speaking very fast and incoherently for the most part. She did however understand **Moseley** to mention something about a female crawling to or from a door.

Witness ■ stated that she was working at Research Medical Center patient check-in area. At approximately 0350 hours, **Moseley** walked up and asked for a mask. ■ asked **Moseley** if he needed to check in to the hospital to which he replied "no, I need to turn myself in" and stated that someone was dead. ■ then called for the off-duty officer to arrive.

Moseley was taken into custody by the off-duty officer once on scene officers confirmed the presence of the deceased female. **Moseley** was escorted to the 7th floor interview room #1 of Police Headquarters. I observed **Moseley** to be wearing a pair of black athletic shoes, blue jeans with apparent blood on both pant legs in the knee and below area and a pair of red and black checkered pair of shorts/underwear visible due to the jeans sagging below the waistline. I also observed what appeared to be blood on **Moseley**'s hands. I read **Moseley** his Miranda Waiver verbatim at 1043 hours and he stated that he understood his rights. **Moseley** expressed that this investigation was exactly like his previous criminal charges where he was set up by having a female with broken ribs placed in a hotel room just so he can be charged criminally. **Moseley** then invoked his right to an attorney at 1048 hours and the interview was concluded.

During the processing of the crime scene, it was discovered that the Victim had sustained at least two gunshot wounds to her head, one of which appearing to be a close/possibly contact wound due to the amount of black powder around the bullet hole. Several bullet holes were located in the wall behind and around where the Victim's body was located. Several other bullet holes were also located around the other walls of the room. A white mattress was located inside the same bedroom as the victim and contained multiple personal miscellaneous items on top of it and one spent shell casing. The mattress also had several blood stains and drops as well as a pair of male underwear with blood on them. A total of eleven spent 9mm casings were recovered from inside the bedroom and several live rounds were located inside the second bedroom inside a small plastic bag and box.

Numerous documents and pieces of mail, to include State of Missouri Department of Corrections, Missouri Department of Social Services and banking documents addressed to and naming **Moseley** were located throughout the residence.

During the next of kin notification, detectives spoke with the Victim's mother, who, upon learning of her daughter's death, immediately asked where **Moseley** was and referred to him by his first name. the Victim's mother stated that the Victim had been dating **Moseley** for approximately one month and had moved in with him close to a week prior but had not told her mother where. She added that her daughter did not share many

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things about her relationship with **Moseley** but that she witnessed **Moseley** grabbing the Victim with both of his hands and shaking her at some point in the last few weeks.

During the area canvass a neighbor described the residents of the location as a “couple in their 20-30’s” but she did not know their names and proceeded to describe the male and female. The description matched the Victim and **Moseley**. She added that an older female used to reside at the address previously with a male matching **Moseley’s** description and that the male continued living there after the older female (neighbor believed to be the male’s mother or grandmother) moved out approximately one month prior.

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.