

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

POLICE NO. :	KC20022751
PROSECUTOR NO. :	095458559
OCN :	hs018876

STATE OF MISSOURI,	)	
	)	PLAINTIFF,
vs.	)	
	)	
CAYLON D. DUDLEY	)	
9415 E 39th St	)	CASE NO. 2016-CR01924-01
Kansas City, MO - 64133	)	DIVISION 14
DOB: 08/01/1995	)	
Race/Sex: B/M	)	
	)	
	)	DEFENDANT.

INFORMATION IN LIEU OF INDICTMENT

In the Circuit Court of Jackson County, Missouri, at Kansas City, Term, 2021. In Division Number 14 thereof, designated by the rules of said Court as Criminal Division 14.

Count I. Murder 2nd Degree (565.021-001Y198409990)

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 1, 2020, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Damen Taylor caused the death of Damen Taylor by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), RSMo, it will be based on the death of Damen Taylor as a result of the perpetration of the class B felony of Unlawful Use of a Weapon under Section 571.030.1(9), RSMo, 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.

Count II. Armed Criminal Action (571.015-001Y197552990)

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 1, 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 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.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Lauren Berry

Lauren Berry (#72474)

Assistant Prosecuting Attorney
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WITNESSES:

1. Roger G. Aimijo, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. Jacob M. Alexander, 1125 Locust, Kansas City, MO 64106
3. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
4. Stacie Frobenius, 2645 Brooklyn Ave, Kansas City, MO 64131
5. Jonathan D. Geiger, 2640 Prospect Ave., Kansas City, MO 64127
6. Jeremy W. Gragg, 1125 Locust, Kansas City, MO 64106
7. Lindsey J Haldiman D.O., 950 E. 21st St., Kansas City, MO 64108
8. Chiquita (V's Mother) Harris, 5155 Gray Lane, #B, Las Vegas, NV 89119
9. Carmen Hawkins, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
10. Ivory Hawkins, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
11. Malcolm Hawkins, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
12. Reonna Hawkins, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
13. Tasia Hawkins, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
14. Bobbie S. King, 1125 Locust, Kansas City, MO 64106
15. Alexis Lalli, 2645 Brooklyn Ave., Kansas City, MO 64127
16. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
17. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
18. Franki Nix, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
19. Uriel Ojeda,
20. DET James H. Price, 1125 Locust, Kansas City, MO 64106
21. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
22. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
23. Teresa Shippy, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
24. Benjamin Simmons, 2645 Brooklyn Ave., Kansas City, MO 64127
25. Tilease Sims, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

26. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
27. Damen (V's Father) Taylor, Sr., 533 Randolph Rd, Apt. 1B, Newport News, VA
23601
28. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 4/3/2020

CRN: 20-22751

I, Detective Steffan Roetheli #4876

(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 04/01/2020, at 9415 E. 39th Street in
(Date) (Address)

Kansas City, Jackson County Missouri Caylon D. Dudley
(County) (Name of Offender(s))

B/M 8/1/1995 5'7" committed one or more criminal offense(s).
(Description of Identity)

2nd Degree Murder and Armed Criminal Action

The facts supporting this belief are as follows:

On 4/1/2020, at approximately 1710 hours, officers of the Kansas City, Missouri Police were dispatched to 9415 E. 39th Street on a reported shooting. Upon arrival, officers were told by witnesses a male had been shot and transported by private vehicle to a local hospital. Officers located a small amount of blood in the street in front of 9412 E. 39th Street. Multiple witnesses were located. The victim, Damen Taylor (B/M 8/6/2001) was transported to TMC where he subsequently died. The Jackson County Medical Examiner ruled the death a homicide.

A search of the crime scene resulted in locating two 9mm shell casings.

Witness #1, ■■■, stated she was in her house when she heard a loud commotion outside. She looked out of her window and saw a crowd in the middle of E. 39th Street, west of her house. The people appeared to be fighting. ■■■ observed a black male with a stocky build, fighting another skinny black male in the street. The stocky black male pushed the skinny black male to the ground and pulled out a gun. He shot the skinny black male three times and walked east towards the intersection of E 39th Street and Crescent Avenue where a white four door vehicle was parked. The male got in the vehicle and it sped away northbound on Crescent Avenue. ■■■ did not get a good look at the stocky black male but he did have a short afro hairstyle.

Witness #2, ■■■, stated he was on his way home and was pulling up to the intersection at 39th and Crescent. He saw a white car parked on Crescent on the south side of 39th and a light blue or silver Mercedes parked on Crescent on the north side of 39th. As he was southbound on Crescent, he looked to the east and saw multiple people fighting in the ditch in front of 9412 E. 39th. A black male in a tan or beige shirt and blue pants pulled out a gun and shot another male 2-3 times at close range. He put his car in reverse and accelerated back down the street until he got to 3720 Crescent. He saw 2 males outside the house and told them to call 911. He then saw the Mercedes and the white car drive past him at a high rate of speed.

The male at 3720 Crescent was contacted. He had video on his house. He consented to a search for his video system. He stated he got a look at the driver of the Mercedes. He viewed a lineup and identified the photo of Crae Dudley as the driver of the Mercedes.

Witness #3, ■■■, was at the scene and witnessed the incident. She stated on 4/1/2020 a short "chubby" black male wearing black clothing and jeans knocked on her door at 9415 E 39 Street. She answered the door and did not recognize

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the person. He asked for his automobile jack. ■ called her father, after the male told her he was not going to leave until he got his jack back. ■ went down stairs and told her cousins, ■ and ■ that a male was outside and would not leave. ■ and ■ went outside and told the male to leave. He drove up to the intersection and parked for approximately an hour. A "dread headed" male arrived and joined the short heavyset male. The two approached the door again and knocked on the door. ■ went back down stairs and told ■ the two suspects were knocking on the door again. ■ said not to open the door. ■ went back outside to talk to the males. ■ heard the male with the long dreadlocks say that he was going to shoot up the house. ■ began to fight with the males outside. ■ went to try to stop the fight and the male with the dreadlocks shot ■ with a black colored pistol. ■ advised she had a photograph taken by her sister of the two suspects when they were in the front yard of her residence. The photograph depicts the male in the black clothing lying on the hillside with a pistol in his right hand.

Witness #4, ■, was interviewed by detectives. She was at 9415 E. 36th Street when the shooting occurred. ■ was there visiting family, which included the victim. An unknown black male stopped by asking for his jack. No one at the house knew where the jack was and they told him he would need to wait until ■ uncle got back to the house. The male responded by saying he was not going to move until he got his jack back. The male and the female with him then got into a short verbal altercation with the victim before they went back to their vehicle. Another black male, who had dreads arrived outside of the house. When ■ looked outside she saw both of the suspects. She described the first suspect at the house as a medium skinned black male with a full beard wearing a grey long sleeve shirt and black jeans. That suspect was lying on the ground holding a gun and patting it against himself. While that suspect was doing this, ■'s cousin, later identified as ■ was exchanging words with him. During the exchange ■ heard that suspect say he "was going to shoot." ■ decided during the exchange that he was going to fight the suspects. ■ and ■ both became engaged in a physical altercation with the suspect with the full beard. ■ attempted to break up the altercation. The other suspect, who ■ described as a dark skinned black male with long dreads and a beard with a reflective construction jacket, pulled out a firearm and shot ■. ■ said the suspect who started with the gun was not the suspect who shot the victim. She is unsure how the suspect who shot the victim ended up in possession of the firearm. ■ was presented a photo lineup of 6 Black Males all similar in appearance to Caylon Dudley (B/M) 08/01/1995. ■ positively identified Caylon Dudley as the male with dreads who shot the victim.

Witness #5, ■, was interviewed. She stated on 03/31/2020 she met with Crae Dudley and borrowed an automobile jack to fix her vehicle. She then went to 9415 E. 39 Street where she dropped off the vehicle and the jack. She stated she knows Crae because he has a child with her cousin, and knows Caylon as his brother. She was informed by ■ that Crae arrived to 9415 E 39 St on 4/1/2020 to get the jack back and said that he was not going to leave. She called her cousin and told her that no one inside could carry the jack outside and was told by the cousin they were going to leave. The cousin then sent a message to ■ stating something bad was about to happen. ■ left and approximately an hour and a half later, ■ arrived to 9415 E. 39 St. She observed Crae Dudley's rented white Ford Fusion parked on the corner. She observed Crae and his brother, Caylon Dudley, standing on the steps to 9415 E. 39 Street. She approached him and asked why they were still there. She observed ■ talking to Crae and Caylon. Crae walked away and attempted to leave. Caylon told ■ he did not want any problems, but she could see he was adjusting his waistline like he was armed, but RH did not see a gun at that time. ■ told Caylon that she was going to bring the jack up to their car and to walk away from the residence. Caylon told ■ he will not leave unless he got the jack. She walked into the residence looking for parts to the jack. She could hear the sounds of fighting outside. She then heard Caylon had a gun and threatened to shoot up the residence. She walked outside observed a fight in the ditch across the street. She could not see who was fighting with Crae, but observed Caylon raise up a pistol and fire twice. Caylon crawled out of the ditch on his back and fired the gun again. She did not see who was shot at first, but observed ■ fall to the ground. Crae and Caylon ran to their vehicles left the scene. She loaded ■ into her vehicle then drove to Truman Medical Center.

Witness #6, ■, stated she was at 9418 E. 39th Street on 4/1/2020, when a black male came to the house wanting his jack back. She said the victim ■ told the other male the jack was not at the house and the male could wait for the jack to be brought back to the house, but he could not wait on the residence's property. She left the residence and returned at about 1600 hours and saw ■ on the front porch with 2 black males. They were verbally arguing. They continued to argue until one of the suspects laid down in the front yard and produced a handgun. He was described as a black male about 5'08" wearing a gray Kangol style hat. The other suspect was described as a black male in his late 20s with long

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dreads, pulled into a pony tail. The gun was a black and silver semi-auto pistol. [REDACTED] approached the suspect who had the gun earlier, who was wearing the Kangol hat. He handed the hat and jacket to the suspect with dreads. The suspect who had previously had the jacket and Kangol hat started throwing punches with [REDACTED]. The fight continued across the street into the drainage ditch. [REDACTED] and [REDACTED] tried to break up the fight. The suspect with the dreads pulled out a gun and fired two rounds at [REDACTED], the victim, which struck him. [REDACTED] was unable to identify the suspects in a photo lineup.

Witness #7, [REDACTED], stated she was at her aunt's house at 9418 E. 39th Street on 4/1/2020. She did not see how the fight started, but when she got outside, she saw [REDACTED] boxing with a black male. [REDACTED] slipped and [REDACTED], the victim went to help him. That is when the suspect with dreads shot the victim.

Witness #8, [REDACTED] provided a formal interview. He stated on 4/1/2020, Crae Dudley came to his house. He came and asked for a jack back. The first time he came to the door [REDACTED] said he looked normal, but after that, he appeared high. [REDACTED] left the house and when he came back Crae was yelling "Bitch ass nigger, I need my jack!" He was waving a gun around as he was yelling. [REDACTED] told Crae to get off of the porch, which he did. As he left the porch Crae pushed [REDACTED]. Crae and [REDACTED] began fighting and the fight moved to the street. During the fight, Crae fell and it is then that [REDACTED] believed Crae dropped his gun and the other male with Crae picked it up. The fight continued into a ditch and multiple people were trying to break up the fight. [REDACTED] said he believed the fight went too far and Crae was being beat up. [REDACTED] heard two gunshots. The victim stood up and stated "Damn I got shot!" Crae, the other male and female who was with Crae got in their cars and drove off. MH positively identified Crae Dudley in a photo lineup. He knew his name because his baby's mother kept yelling it during the fight. [REDACTED] identified Caylon Dudley in a photo lineup as the male who was with Crae. [REDACTED] sustained minor injuries during the fight.

On 4/3/2020 at about 1358 hours, Caylon Dudley was picked up. He was transported to Headquarters and was escorted to one of the interview rooms. Caylon Dudley was read his Miranda rights and he stated he understood his rights. He stated he received a call from his brother, Crae Dudley, to come to the area of 9418 E. 39th Street to assist him while he got his jack back. He went over to the house and he and his brother had a verbal argument with the occupants of the house. One of the males in the house came out to fight. Crae and the male agreed to have a one-on-one fight. Crae handed his jacket and his gun, a Taurus G2 9mm, to Caylon and they started fighting in the street. The fight moved to the ditch and a female came out of the house and started hitting Crae. Caylon was holding the gun in his right hand and was holding the female back with his left hand. The victim then came out of the house and started hitting Crae. He hit Crae several times and then stepped back to pull up his pants. When he went back up to Crae to hit him again, Caylon pointed the gun in his direction and fired two times. He realized the victim was hit and he ran to his car and drove off. He stated he shot because he was in fear for his safety.

Caylon stated he and his brother met up at his house after the shooting. He gave the gun back to his brother. When Crae Dudley was picked up on 4/3/2020, he had a Taurus G2 9mm on him. It was sent to the Police Crime Lab and test fired. Examination of the test fired casing and the 9mm casings from the scene showed they were fired from the same weapon.

Caylon Dudley signed a consent to search for his phone. His phone was searched and there were numerous text messages between Caylon and Crae. There is one from Caylon to Crae stating "Whatever you do Not repeat Do not get rid of yo shyt...It will ruin my self-defense case....its legal...no need to discard of it...there is no need to discard of it if there was no crime & you need it for protection!!...." His phone also had an internet search for Stand Your Ground laws.

Due to the violent nature of the act and it involving a firearm, and for the safety of the community, the case detective is requesting a warrant in lieu of a summons for the offender, Caylon Dudley.

Printed Name Det. Steffan Roetheli #4876 Signature /s/ Det. Steffan Roetheli #4876

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

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Judge

Circuit Court of _____ County, State of Missouri.