


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

POLICE NO. :	KC22055778
PROSECUTOR NO. :	095470981
OCN:	HU008692

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
TIMOTHY J. GREEN)	
5114 GARFIELD AVE)	CASE NO. 2216-CR
Kansas City, MO 64130)	DIVISION
DOB: 12/15/1962)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 18, 2022, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Leslie Taylor caused the death of Leslie 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), it will be based on the death of Leslie Taylor 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 (571.015-001Y20205213.0)

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 August 18, 2022, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years.

**Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle,
At Person, Motor Vehicle Or Building, Resulting In Death Or Injury
(571.030-015Y20205213.0)**

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 August 18, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons and, and as a result of the above described conduct, Leslie Taylor suffered injury or 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.

State vs. Timothy J. Green

Count IV. Armed Criminal Action (571.015-001Y20205213.0)

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 August 18, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar 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/ Joseph R. Van Amburg
Joseph R. Van Amburg (#64207)
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WITNESSES:

1. [REDACTED]. Office, 415 E 12th St, Floor 11, Kansas City, MO
64106
2. Dale Dennis, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Clyde M. Harvey Jr., 1125 Locust, Kansas City, MO 64106
4. [REDACTED]
64106

PROBABLE CAUSE STATEMENT FORM

Date: 08/19/2022

CRN: KC22055778

I, Detective Clyde Harvey #5596, Kansas City Missouri Police Department, Homicide Unit
(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 08/18/2022, at 5228 Brooklyn Avenue in
(Date) (Address)

Kansas City, Jackson County Missouri Timothy Green
(County) (Name of Offender(s))

B/M 12/15/1962, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 08/18/2022, at 1855 hours, officers of the Kansas City Missouri Police Department were dispatched to the area of E 53rd Street & Brooklyn Avenue, (Blue Hills Park) located in Kansas City, Jackson County Missouri on a reported shooting.

Upon arrival, officers observed a black male (victim) deceased at Blue Hills Park approximately 15 feet from a pergola near E 53rd Street. The Kansas City Fire Department was notified as Medic 507 responded to the scene and pronounced the victim deceased at 1904 hours.

While on scene, officers made contact with [REDACTED] who observed Timothy Green B/M 12/15/1962 near the Blue Hills Park wearing a white baseball cap, a light colored tank top and acid washed jeans. The witness informed the reporting officer that the victim was also at the park and [REDACTED] observed Green shooting the victim. As additional officers arrived at the location, an area canvass was conducted at which time two (2) additional witnesses were contacted. [REDACTED] (a male witness who resides on Brooklyn Avenue near the park) advised that an argument was heard (in the park) and as [REDACTED] turned to see what the argument was, he observed Green shooting the victim. [REDACTED] was contacted by responding officers as [REDACTED] also mentioned hearing an argument coming from the park. As [REDACTED] looked towards the park, he observed Green shoot the victim and leave northbound from the park [REDACTED] also provided responding officers with a description of the clothing Green was wearing (which was consistent with [REDACTED], as well as his residence as Green was known to live near E 51st Street and Garfield.

After receiving information regarding the area in which Green was known to live, officers conducted a computer check in the area (E 51st Street and Garfield Avenue) which resulted in an address of 5114 Garfield Avenue listed for Timothy Green. Officers responded to the listed address (5114 Garfield Avenue located in Kansas City, Jackson County Missouri) and observed a black male matching the description that was provided by the witnesses (white baseball cap, light colored tank top and acid washed jeans). As the officers made contact with the male, they observed apparent blood on his shirt, shorts and shoes. The male was taken into custody at 1907 hours, but the officers did not find a gun on his person.

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Detectives were notified and responded to the scene. Upon arrival, detectives were provided information (by responding officers) regarding the original call for service and officers' observations upon arrival. Detectives made contact with ■ who stated he observed **Green** and the victim at the park. ■ stated as the victim started backing away, **Green** presented a handgun and shot the victim in the head. ■ stated after the victim was shot, he immediately went towards the victim to check on him. After noticing the victim was unresponsive, ■ looked up and observed **Green** leaving the park. ■ stated **Green** was labeled as "the neighborhood bully", as he would brandish his gun frequently in an attempt to intimidate individuals he would get in arguments with. ■ also stated the victim was never known to carry a firearm.

Detectives then made contact with ■ who stated the victim came to his house two weeks prior to the shooting looking for **Green**. ■ advised the victim that he was unaware of **Green's** whereabouts. The following day, ■ learned of an altercation between the victim and **Green**, in which **Green** spat on the victim. ■ assumed this to be the reason the victim was looking for **Green**. On 08/18/2022, sometime between 1730 and 1830 hours, ■ was sitting on the front porch of his residence, which faces the west end of Blue Hills Park. While on his front porch, ■ observed **Green** walking east on 52nd St., south on Brooklyn Ave., then toward the park shelter. ■ could see that **Green** apparently had a firearm tucked into the waistband of his pants with his shirt covering the firearm. Approximately 30 minutes later, ■ observed the victim's arrival, as the victim parked his vehicle on Brooklyn and walked to the park shelter. Shortly after the victim's arrival, ■ heard a commotion coming from the park and as ■ looked to the same shelter he saw **Green** and the victim headed, he observed the victim with both hands up backing away from **Green**. As the victim continued backing away, ■ noticed **Green's** gun was still in his waistband and not pulled out. The victim continued backing away at which time **Green** pulled a black handgun from his waistband and fired one shot into the ground. Approximately ten (10) seconds after **Green** fired the first shot, ■ observed the victim (still backing away with his hands up) and **Green** pursuing the victim. ■ then observed **Green** point the handgun at the victim's chest and fired once again, causing the victim to fall to the ground. ■ observed **Green** leaving the area on foot along the same path used for his arrival. As **Green** passed ■ asked **Green** why he shot the victim and told **Green** the shooting was unnecessary. **Green** responded by telling ■ to call the police. ■ overheard his neighbor ask **Green** why he shot the victim, to which he heard **Green** reply that the victim was bothering him.

Detectives also made contact with ■ who stated at the time of the incident, he was inside his residence when he heard two (2) sounds of shots. ■ stated he went outside and observed the victim on the ground and **Green** walking westbound through the park. ■ provided a clothing description consistent with the witnesses on scene. ■ observed a black firearm tucked inside **Green's** right side waistband and overheard ■ making statements advising **Green** "didn't have to do that" (which was consistent with ■'s statement). ■ overheard **Green** reply to ■, "call the police" and **Green** also stated the victim was bothering him. ■ then observed **Green** leaving the park as he continued to reposition the firearm in his waistband. ■ also stated he was aware of the incident that occurred weeks prior, as he was present when **Green** spat on the victim.

Detectives responded to Metro Patrol Division detention and made contact with **Timothy Green** who agreed to provide his formal statement. **Green** was signed out of Metro Patrol detention and he was escorted to the Interview Room. **Green** was read his Miranda Rights (from the Miranda Warning card) at which time he stated he understood his rights. **Green** stated on 08/18/2022, at approximately 1230 hours, he was at a liquor store near E 50th Street and Woodland.

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While inside the store, **Green** was confronted by the victim (who had two pipes in his hand) and was threatening to kill him. **Green** stated he quickly found refuge inside the store and called 911 to report the disturbance. As responding officers arrived, **Green** stated the victim was no longer in the area at which time he was escorted to his residence by police. When asked about the events that occurred at the park, **Green** stated the victim has been following him and harassing him for weeks. **Green** stated he didn't understand why the victim was determined to follow him but added when he went to the park (at around 1700 hours), he noticed the victim arrive in a white truck. **Green** stated the victim immediately approached him as **Green** was pleading for the victim to leave him alone. The victim continues to pursue **Green** at which time a gun is presented and pointed at **Green**. After seeing the gun, **Green** stated "I automatically... started tussling". When asked the description of the gun he observed, **Green** replied "I don't know" and stated it was an "automatic", but **Green** was unaware of what the gun looked like. **Green** stated after the shooting happened, he ran home and as he got himself "together" and thought to call police, the police were approaching him near his residence. When asked where the gun was located, **Green** stated he didn't know. **Green** denied taking the firearm from the scene and stated it was possibly still with the victim. **Green** also stated someone else at the scene possibly picked the gun up and moved it.

On 08/18/2022, at 2102 hours, detectives completed and submitted an application for search warrant and search warrant to Jackson County Prosecutors Office for the search of the residence at 5114 Garfield Avenue (located in Kansas City, Jackson County Missouri). At 2142 hours, the search warrant and application were signed by the 16th Circuit Court of Jackson County Judge. Detectives, Crime Scene Investigators, and a designated Alcohol, Tobacco, Firearms, and Explosives (ATFE) canine and canine handler responded to 5114 Garfield Avenue and executed the search warrant. During the execution of the search warrant for the residence, the aforementioned personnel observed a black plastic bag that appeared to conceal an object within one of the wheel wells of a tan colored Audi sedan that was parked in the driveway next to **Green's** house. A secondary search warrant for the aforementioned vehicle was sought and granted by the 16th Circuit Court of Jackson County Judge. The object concealed within the black bag was later revealed to be a black Glock model 23 handgun. It should be noted that while searching the residence, a black plastic bag was found near the rear door of the residence; the bag was similar in appearance to the black plastic bag that was found within the wheel well.

On 08/19/2022, at approximately 1130 hours, detectives responded to 5000 Woodland to learn more information about the disturbance **Green** spoke about during his interview. [REDACTED] advised he has known the victim for four years as he mows the stores grassy lot. [REDACTED] advised on 08-18-2022, at approximately 1230 hours the victim became involved in a verbal altercation regarding money with another customer he recognized, but did not know his name. [REDACTED] said he had never seen the victim angry or behave in this manner in the years he had known him. [REDACTED] instructed the victim to not act this way in his store at which time the victim exited the interior of the store [REDACTED] said the known customer seemed to be verbally re-engaging the victim at the closed entrance door causing the victim to re-enter the store with a steering wheel lock in his hand. [REDACTED] said there was not a physical confrontation but [REDACTED] reminded the victim to leave to which the victim complied.

Green is a convicted felon for the following offenses:
Robbery
Involuntary Manslaughter

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Armed Criminal Action
DWI- Alcohol – Prior Offender
Assault

I request a warrant be issued for **Green** and a bond associated with the warrant due to **Green** being a danger to the witnesses and the public.

Printed Name Detective Clyde Harvey #5596 Signature /s/ Detective Clyde Harvey #5596

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

Judge

Circuit Court of _____ County, State of Missouri.