

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

POLICE NO. :	KC25050403
PROSECUTOR NO. :	095486151
OCN:	

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 BAILEY LEWIS)
)
 12904 CHARING CROSS RD, Apt. 3) CASE NO. 2516-CR
)
 LENEXA, KS 66215) DIVISION
)
 DOB: [REDACTED])
)
 Race/Sex: B/F)
)
 S.S.N.: [REDACTED])
)
 DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-003Y20200912.0)

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 9, 2025, in the County of Jackson, State of Missouri, [REDACTED] was killed by being shot as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030, RSMo, committed by the defendant on or about August 9, 2025, 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.

Count II. Accessory Armed Criminal Action (571.015-001Y20205213.2)

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 9, 2025, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen 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 five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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.

Count III. Accessory Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.2)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B 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 9, 2025, at [REDACTED], in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, knowingly shot a firearm at a habitable structure located at [REDACTED], Kansas City.

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 and not to exceed fifteen (15) years. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

Count IV. Accessory Armed Criminal Action (571.015-001Y20205213.2)

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 9, 2025, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, 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.

Count V. Accessory Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.2)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B 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 9, 2025, at [REDACTED] in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, knowingly shot a firearm at a habitable structure located at [REDACTED], Kansas City.

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 and not to exceed fifteen (15) years. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

Count VI. Accessory Armed Criminal Action (571.015-001Y20205213.2)

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 9, 2025, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another or others, committed the felony of unlawful use of a weapon, charged in Count V, 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 range of punishment for the offense of Armed Criminal Action in violation of section

571.015.2, 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.

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.

MELESA N. JOHNSON

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jamie K. Hunt

Jamie K. Hunt (#50401)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
(816) 881-4622
jhunt@jacksongov.org

WITNESSES:

The State's witnesses as of 8/28/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 08/28/2025

CRN: KC25050403

I, Detective David Adair #5590

(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 08/09/2025, at [REDACTED] in
(Date) (Address)

Kansas City, Jackson Missouri Bailey Lewis
(County) (Name of Offender(s))

B/F [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08/09/2025 at 2204 hours, officers of the Kansas City Missouri Police Department were dispatched to [REDACTED], Kansas City, Jackson County, Missouri regarding a shooting. Upon their arrival, they located a juvenile female in the only bathroom of the structure suffering from a gunshot wound to her throat. She was subsequently transported to a nearby hospital where she succumbed to her injuries and was declared deceased. A homicide investigation was initiated.

Detectives interviewed multiple other people who were inside the structure whose stories were all very similar. They described a normal night with two of the females fixing each other's hair at a vanity near the front door of the structure, one female was in back bedroom while two adult males were playing video games in the living room. A toddler was also present in the home. They heard the sound of gunshots and observed projectiles entering the home through the front door and living room wall/window area near the front door. The juvenile female struck by gunfire was fixing her friend's hair at the vanity when she was shot in the throat. She ran to the bathroom where she collapsed. No party inside the home could provide any suspect information as they did not witness the shooters nor did they know who would have motive to harm them.

The crime scene consisted of numerous 9mm shell casings in the street/curb area on [REDACTED] along the street in front of [REDACTED]. The general spacing of the casings seemed to indicate the person(s) firing the shots were in motion southbound on [REDACTED] as they were firing. The home itself and a red Mazda in the driveway were struck numerous times by gunfire. The home had bullet damage/fragments inside and outside and a large amount of apparent blood leading from the living room to the bathroom area. There were pieces of multiple AR-15 type firearms in the home but they were inoperable based on their configuration, they also were not the same caliber as the casings

PROBABLE CAUSE STATEMENT FORM

CRN KC25050403

outside. A 9mm Glock handgun was located under a pillow on a bed in one of the bedrooms. Live ammunition and narcotics/paraphernalia were also present in the home.

Detectives conducted an area canvass but did not locate any person(s) who observed the shooting. They were able to locate three videos on [REDACTED], all of which captured the same vehicle, presumed to be a newer model gray Hyundai Elantra, driving south on [REDACTED] at a high rate of speed while the sound of shots were being fired. The vehicle was always in motion on camera view and no other person(s) or sounds of person(s) were heard or observed in the videos before or after the Hyundai entered and left camera view. This would indicate, based on the shell casings being arranged the way they were, that the Hyundai is the suspect vehicle.

On the same camera footage capturing the shots being fired, the Hyundai was also observed making an eastbound turn onto East 37th Street toward Jackson Avenue. Another camera was obtained at East 36th Street and Jackson Avenue that observed the Hyundai driving north on Jackson Avenue away from East 37th Street. It then drove north on Jackson Avenue past the camera view at east 36th Street. Once the vehicle reached Jackson Avenue, it had to make a north or southbound turn as East 37th Street dead ends. Detectives reviewed the camera located near East 38th Street and Jackson Avenue and determined the vehicle did not turn south. A Genetec camera located at East 31s Street and Jackson Avenue captured the Hyundai driving north and making a westbound turn onto East 31st Street from Jackson Avenue. The time frame difference between losing the vehicle on footage from East 36th Street and it being picked up by the Genetec camera at East 31st Street was consistent with drive time from those two locations.

Another Genetec camera at East 31s Street and Cleveland Avenue captured the vehicle driving west on East 31st Street before turning into the gas station at 3900 East 31st Street and backing into a parking space. Detectives responded to the gas station and retrieved video from the store which captured three individuals exit the Hyundai and enter the store. The driver, a female, had a black full head/face mask covering her face which she pulled down in the store at the request of the station attendant. Detectives were able to learn the identity of the female who exited the driver's seat, she was determined to be Bailey Lewis (Driver, B/F [REDACTED]). Detectives also reviewed social media accounts and determined [REDACTED], one of the occupants of [REDACTED] when shots were fired into the residence, and Bailey Lewis knew each other.

Detectives re-interviewed [REDACTED] who indicated she knew Bailey but had not spoken to her for months. The night of the homicide, she was at [REDACTED] with "[REDACTED]" and [REDACTED]. The night progressed as a normal until shots started being fired through the home. [REDACTED] was shot so they called the police but had no idea who fired at them as they didn't witness the shooter. I asked her about a female named Bailey that had been identified through the investigation, which she indicated she knew but had not associated with for a couple months. She indicated she did not associate with Bailey anymore because she did not like the way she acted. One such incident of Bailey's behavior she didn't like involved Bailey accusing Arionna of having a male steal

PROBABLE CAUSE STATEMENT FORM

CRN KC25050403

a firearm from Bailey. Arionna denied the claim but was directly accused by Bailey of having something to do with the theft. The relationship between them soured from there until they stopped speaking at all. Arionna was aware the [REDACTED] address was fired into (KC25050402) during the same basic time frame the [REDACTED] address was fired into.

I presented [REDACTED] with a still shot of Bailey Lewis taken from when Lewis entered the gas station at 3900 East 31st Street shortly after the shootings. [REDACTED] immediately recognized Lewis as the person [REDACTED] knew as Bailey.

I asked [REDACTED] if Bailey would have any reason to respond to the area around [REDACTED], which she indicated Bailey does not know anyone else in the area. The only time [REDACTED] knew Bailey to respond to that area was to visit [REDACTED] or herself. I asked [REDACTED] who would know both addresses, [REDACTED] and [REDACTED]. She indicated other than herself, Bailey is the only one of everyone else we talked about in the interview who would know both addresses together.

Detectives re-interviewed [REDACTED], another occupant during the [REDACTED] shooting, who indicated she did know Bailey through [REDACTED]. [REDACTED] had a falling out with Bailey over Bailey letting her get "jumped" at a gas station months before the homicide. [REDACTED] also believed Bailey just purchased a gray 2025 Hyundai Elantra because she saw Bailey post about it on her Facebook profile. Two photographs were presented to [REDACTED], the first was a still shot of Bailey at the gas station after the homicide. The second was a single photograph of Bailey. [REDACTED] positively identified both pictures as the Bailey she knew.

Detectives reviewed the reports around the night of the homicide and located a case where shots were fired into [REDACTED], Kansas City, Jackson County, Missouri under CRN KC25050402. This incident occurred on 08/09/2025 at 2147 hours. Officers responded to the scene and located shell casings in the street and bullet damage to [REDACTED] which is an apartment building that shares an exterior wall with [REDACTED]. Detectives also located surveillance video near [REDACTED] which captured a gray Sedan, which appeared to be a Hyundai Elantra, drive past [REDACTED] twice. The second time the sound of shots were heard as it passes by the address. It should be noted that the passenger side of the vehicle was facing both [REDACTED] and [REDACTED] when shots were being fired. The casings recovered from [REDACTED] were along the path of the vehicle as it was driving by.

The homicide occurred on 08/09/2025 at 2204, approximately fifteen minutes after the shots fired into [REDACTED]. It should be noted the drive time via google maps is between 11-18 minutes from location to location depending on the route you take. This drive time aligned with the approximate time frame between the incidents if a car fired shots into [REDACTED] and then drove straight to [REDACTED]. A NIBIN link was confirmed between the shell casings located at [REDACTED] and [REDACTED], indicating the same gun ejected the spent casings at both scenes.

PROBABLE CAUSE STATEMENT FORM

CRN KC25050403

Detectives conducted a search through police databases and located a gray 2025 Hyundai Elantra registered to Bailey Lewis with the Kansas Temporary tag of [REDACTED]. The basic physical characteristics, body style, color and rims of the vehicle registered to Bailey's vehicle matched the vehicle from all the surveillance footage we located around both crime scenes.

Bailey Lewis filed a loss report approximately one month prior to the homicide where she called the police for assistance. The phone number she called from was [REDACTED]. Detectives contacted Bailey's mother at her residence who also provided the same phone number as Bailey's current number. The cellphone number was run through police databases which revealed it to be registered to Bailey Lewis through Cellco Partnership (Verizon Wireless). A PRTT/historical warrant was applied for and granted which indicated Bailey's cellphone was at the [REDACTED] crime scene and [REDACTED] crime scene during the times the shootings were committed.

A person of interest entry was placed for Bailey and she was subsequently arrested in Independence, Missouri on 08/28/2025. She was driving her vehicle which was the same 2025 gray Hyundai Elantra (KS Temp: [REDACTED], VIN: [REDACTED]), with a handgun and cellphone in plain view when she was arrested. The vehicle was transported to the city tow lot awaiting a search warrant for processing.

Printed Name Detective David Adair #5590 Signature /s/ Detective David Adair #5590

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

Judge

Circuit Court of _____ County, State of Missouri.