

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

Police# 16-086154  
Prosecutor# 095436250  
16-CR  
OCN# B2106880

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Ryan Taylor**  
**2501 Olive St.**  
**Kansas City, MO 64128**  
**DOB: 11/10/1996; Race/Sex: B/M;**  
**SS# [REDACTED]**  
**Defendant.**

**Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At  
Person, Motor Vehicle Or Building (571.030-020Y20145213.0)**

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 November 15, 2016, at 25th St. and Park Ave., in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm from a Chevrolet Tahoe, a motor vehicle.

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.

**Count II. Armed Criminal Action (571.015-001Y19755213.0)**

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 November 15, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon, charged in Count I, 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 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 attached statement(s) of facts, 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.

**THE STATE OF MISSOURI**

vs.

**Ryan Taylor**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

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Katherine Baker Nelson (#62733)  
Assistant Prosecuting Attorney  
415 E. 12th Street, 11th Floor  
Kansas City, Missouri 64106  
(816) 881-3560  
kjbaker@jacksongov.org

**WITNESSES:**

PO Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106  
DEP Dustin Atkins, 3310 NE Rennau, Lees Summit, MO 64064  
DET Michael E. Buckley, 1125 Locust, Kansas City, MO 64106

SGT Robert J. DeYaeghere, 1125 Locust, Kansas City, MO 64106  
PO Cordell Eby, 1125 Locust, Kansas City, MO 64106  
CPT Daniel W. Graves, 1125 Locust, Kansas City, MO 64106  
DET Jennifer D. Jacobs-Weyrauch, 1125 Locust, Kansas City, MO 64106  
DET Dawn M. Jones, 1125 Locust, Kansas City, MO 64106  
DET David D. Kisse, 1125 Locust, Kansas City, MO 64106  
MAJ Joseph F. McHale, Prosecuting Atty. Office, Kansas City, MO 64106  
PO Christopher L. Millsap, 1125 Locust, Kansas City, MO 64106  
PO Quentin Neal, 1125 Locust, Kansas City, MO 64106  
DEt Mike Nelson, Clay County Sheriff's Department, Liberty, MO  
PO Timothy M. Perry, 1125 Locust, Kansas City, MO 64106  
DET Daniel A. Porter, 1125 Locust, Kansas City, MO 64106  
DET Cristin Stammer, 1125 Locust, Kansas City, MO 64106  
PO Zachary S. True, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 11-16-2016

CRN: 16-86154

I, Det. Dawn Jones 5196  
(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 11/15/2016, at 24<sup>th</sup> St and Park Ave in  
(Date) (Address)

Kansas City, Jackson Missouri TAYLOR, RYAN  
(County) (Name of Offender(s))

B/M, 11/10/1996 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 11/15/2016 at approximately 1700 hours, Officers of the Kansas City Missouri Police Department were conducting surveillance training in the area of 24<sup>th</sup> Terr and Park Ave, Kansas City, Jackson County, Missouri when a white Chevy Tahoe pulled up next to victim #1 and victim #2. The driver of the white Tahoe (later identified as ██████████ A b/m 04-01-1998) exited the driver's seat and approached victim #1 and victim #2's undercover vehicle, while clutching his waistband. Victim #1 and victim #2 left the area to get away from ██████████ in fear of being carjacked. Victim #1 and victim #2 went to 25<sup>th</sup> St and turned eastbound from Brooklyn Ave and observed the Tahoe coming westbound occupied by two black males. Victim #1 and victim #2 passed the Tahoe and heard gunshots, one of which that struck the back drivers side quarter panel. Victim #3 and victim #5 were in another undercover vehicle (Chevy Silverado) and got behind the Tahoe. Shots were still being fired from the Tahoe towards victim #3 and victim #5. Victim #3 and victim #5 fired shots from their vehicle at the Tahoe, striking the vehicle. The Tahoe was followed by other undercover officers to the area of 19<sup>th</sup> and Charlotte and ██████████ and Taylor, Ryan b/m 11-10-1996 were taken into custody. The white Tahoe had apparent bullet damage entering the rear of the vehicle and exiting the front windshield.

Victim #4 and victim #6 observed shots coming from the white Tahoe in the direction of the Chevy Silverado and Dodge Charger. Victim #4 and victim #6 followed to the white Tahoe to the area of 19<sup>th</sup> and Charlotte and observed them being taken into custody.

Witness#1 observed the white truck westbound on 25<sup>th</sup> St. from Brooklyn at a high rate of speed. Witness #1 observed the front passenger in a bright, possibly orange, jacket hanging out the window shooting two rounds towards behind him.

When Taylor was taken into custody he was wearing a red jacket. Taylor refused to provide a statement without an attorney.

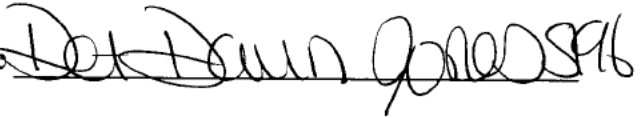
After waiving his rights Worrell stated he was driving the white Tahoe and Taylor was in the front passenger seat wearing a red jacket. Worrell stated as he passed the Charger he heard shots and put his head down. ██████████ stated he did not see Taylor shooting, did not know he had a gun and did not see Taylor hanging out the

**PROBABLE CAUSE STATEMENT FORM**

CRN 16-86154

window. [REDACTED] further added it is possible Taylor was shooting and he heard two different calibers of guns being fired.

The crime scene was located at 25<sup>th</sup> St and Park and extended down 25<sup>th</sup> St. to Garfield. Three 9mm casings were located on 25<sup>th</sup> St. near Park and two 9mm shell casings were located on 25<sup>th</sup> St. near Euclid. A small caliber bullet was removed from the rear driver's side of the Charger and recovered as evidence.

Printed Name Detective Dawn Jones 5196 Signature 

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.