

PROBABLE CAUSE STATEMENT FORM

Date: 11/30/2016

CRN: 16-044883

I, Detective Jennifer Blythe, #5490 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 06/22/2016, at 112th Terrace and Corrington Ave in (Date) (Address)

Kansas City, Jackson Missouri Raymond Pierce (County) (Name of Offender(s))

B/M 07/02/1998 SSN# [redacted] committed one or more criminal offense(s). (Description of Identity)

Robbery-1st Degree
Armed Criminal Action

The facts supporting this belief are as follows:

On 06/23/2016 at 1218 hours, Officers of the Kansas City, Missouri Police Department responded to Central Patrol Division Station located at 1200 E. Linwood Av on a reported robbery. There were two juvenile victims, with their mothers, and they stated the robbery occurred on 6/22/2016 at 1630 hours at 112th Terrace and Corrington Ave.

Later on 6/23/2016, it was determined by Robbery Detectives that this robbery could be linked to another robbery that occurred at the same location on the same day and several suspects had been arrested and were still in custody.

Detectives then contacted both victims who responded to Police Headquarters to provide formal statements and view photo-lineups.

Upon their arrival, detectives interviewed victim #1 [redacted] Victim #1 stated the following:

On 6/22/2016, he walked from The Bay Water Park with Victim #2 [redacted] and two additional victims named [redacted] and [redacted] when a red SUV drove past them. Then a black SUV stopped and Suspect #4, later identified as Jerrell Westmoreland, exited the rear driver's side. J. Westmoreland pushed him to the ground and his gold iPhone with a gold and black case fell out of his pocket. J. Westmoreland took his phone then demanded his Nike Jordan 12's that he was wearing and his back pack. Victim #1's back pack contained a pair of Nike Jordan II's, a pair of red Puma shoes, a wallet with two \$100 bills, and a World's of Fun work uniform shirt. An unknown suspect from the black SUV then took Aaron's shoes. The red SUV then pulled up and Suspect #2, later identified as Rodney Mitchell, exited the SUV with an AK-47 style rifle. R. Mitchell took Victim #2's belongings which consisted of an I Pod, gold iPhone 6 with a gold and black case, two pairs of Adidas shoes, a Hogan Prep burgundy uniform shirt, an EBT card and a green duffel bag. Another suspect from the red truck took Desmond's short and shoes. Taylor explained there were seven suspects and they were all armed with handguns except R. Mitchell that had the rifle. He and the other three victims then ran and jumped a fence before he hid behind a house. The victims were split up for a period until they met back up at The Bay. At that point, they all walked to a friend's house and called their parents. The suspects were at The Bay before they left and he believes the suspects followed them when they observed them leave.

Victim #1 viewed four photo line-ups that consisted of six subjects all similar in appearance. One of the photo line-ups contained a photo of R.Mitchell whom he positively identified as the suspect with an AK-47 type rifle with a one hundred percent degree of certainty. One of the photo line-ups contained a photo of [redacted] whom he tentatively identified with a fifty percent degree of certainty as one of the suspects with a handgun. One of the photo lineups contained a photo of Jerrell Westmoreland whom he tentatively identified as the suspect that had a handgun and took his belongings with a ninety percent degree of certainty. One of the photo line-ups contained a photo of Daquan Howard who was not identified as the suspect.

Victim #1 provided detectives with a Facebook Profile photograph on a smart phone of "Hell Rell" which contained multiple photographs of an individual that bears a striking resemblance to J. Westmoreland and advised that it was the person that robbed him. The reporting detective located a police report written on 2/03/2016 by a KCPD Detective that linked J.Westmoreland to the moniker, "Hell Rell" and identified the Facebook Profile of "Hell Rell" as belonging to J. Westmoreland.

Victim #1 also provided a Facebook Profile photograph of "Rayray Chillin" and stated that the person in the profile photograph was a participant in the robbery. Victim #1 stated that he was a passenger in the black Tahoe and he was wearing a red coat. Detectives located a post on the "Rayray Chillin" timeline that had a date of March 9th. The post stated, "Loi bout to delete my Facebook police had me on nova inbox me for my number." A Detective in the KCPD Nova Unit provided the name Raymond Pierce and advised he is a Nova target that has the Facebook account of

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Rayray Chillin. The Nova Detective also stated that J. Westmoreland and R.Pierce are known gang affiliates in Swag Nation. A computer check revealed R. Pierce's Department of Revenue photograph to bear a striking resemblance to Rayray Chillin's Facebook profile photograph.

Victim #2 stated the following: He and the other victims had just left The Bay and were walking when he saw a red truck drive by fast. Then a black Tahoe approached them and asked Taylor if they knew someone. The suspects then all jumped out and started robbing the victims. The red SUV also pulled up and more suspects exited that vehicle, including R. Mitchell, whom he stated had the rifle. The suspect vehicles then drove away and he and the other victims ran off.

Victim #2 viewed four photo line-ups that consisted of six subjects all similar in appearance. One of the photo line-ups contained a photo of R.Mitchell whom he positively identified as the suspect with an AK-47 type rifle.

Victim #3 [redacted] was contacted by a detective and refused to provide a formal statement due to fear of retaliation. During the brief conversation, he mentioned having a draco in his face over some kicks and stated that one of the suspects he knew as Ray Ray from the Country Club Plaza.

Detectives were unable to locate the fourth victim, [redacted]

When contacted by detectives on 6/23/2016 after he was arrested for an unrelated robbery, J. Westmoreland waived his Miranda Rights and denied any knowledge of the unrelated robbery and was not contacted again by detectives. J. Westmoreland was then transported to Clay County Detention where he was charged with the unrelated robbery.

R. Mitchell was charged and transported to Clay County Detention on an unrelated robbery. A Jackson County warrant was issued for this robbery.

On 11/30/2016, Detectives contacted victim #1 and victim #2 at Hogan Preparatory School and they were each presented with photo line-ups containing a photo of Raymond Pierce b/m 07/02/1998 and five other black males all similar in appearance. Victim #1 and victim #2 positively identified Pierce as one of the suspects in the robbery.

Printed Name Det. Jennifer Blythe, #5490 Signature Det Jennifer Blythe 5490

The Court finds probable cause and directs the issuance of a warrant this 15th day of Dec 2016.

[Handwritten Signature]
Judge

Circuit Court of JACKSON County, State of Missouri.