

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

POLICE NO. :	17-063268
PROSECUTOR NO. :	095440466

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
KENNETH MICHAEL TILLSON	)	
705 Virginia Avenue,	)	CASE NO. 1716-CR
Kansas City, MO - 64109	)	DIVISION
DOB: 05/22/1969	)	
Race/Sex: W/M;	)	
SSN: XXX-XX-████	)	
DEFENDANT.	)	

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840904.0)

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 on or about July 19, 2017, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Jorge Sanchez caused the death of Jorge Sanchez by stabbing him.

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 (571.015-001Y19755212.0)

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 July 19, 2017, 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

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committed the foregoing Felony of Murder in the Second Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Daniel Nelson
Daniel Nelson (#53885)
Assistant Prosecuting Attorney
415 East 12th Street 11th Floor
Kansas City, MO - 64106
(816) 881-3372
DMNelson@jacksongov.org

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WITNESSES:

[REDACTED]
SGT Everett C. Babcock, 1125 Locust, Kansas City, MO 64106

DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106

DET Andrew J. Henry, 1125 Locust, Kansas City, MO 64106

[REDACTED]
[REDACTED]
[REDACTED]
DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106

[REDACTED]
DET Austin M. Reiter, 1125 Locust, Kansas City, MO 64106

PO Kelsey S. Wingate, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07/19/2017

CRN: 17-63268

I, Det. Darin Penrod #4288
(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 07/19/2017, at 43rd and Madison in
(Date) (Address)

Kansas City, Jackson Missouri Kenneth M. Tillson
(County) (Name of Offender(s))

W/M, 05/22/1969, SSN [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Murder

UUW

The facts supporting this belief are as follows:

On 07/19/2017 at approximately 1737 hours, officers of the Kansas City Missouri Police Department were dispatched to 905 Westport Rd, near the intersection of Westport Road and Southwest Trafficway, on a reported cutting. Upon arrival, officers observed a victim suffering from several stab wounds. The victim was transported to St. Luke's Hospital in critical condition. He later succumbed to his injuries. The suspect, identified as **KENNETH MICHAEL TILLSON, W/M, 05/22/1969**, was taken into custody at the scene.

Witness #1 stated he is homeless and hangs out in the area where the captioned incident occurred. Witness #1 met "Mike," who was identified as **TILLSON**, earlier this morning. **TILLSON**, Witness #1 and the Victim were hanging out in a field drinking throughout the day. At some point, Witness #1 fell asleep, but as he woke up he observed the Victim walking away from him through the field. While the Victim was approximately 20-30 yards away, Witness #1 observed **TILLSON** approach the Victim from the rear. Witness #1 then observed **TILLSON** lunge towards the Victim, making a striking motion with a knife in his right hand. He observed **TILLSON** stab the Victim in his back and left arm, near the elbow. Witness #1 told responding officers that **TILLSON** assaulted the Victim. Witness #1 was able to point **TILLSON** out to police officers, and watched **TILLSON** get taken into custody. Witness #1 said **TILLSON** had a red knife attached to a clip on his hip. Due to Witness #1 pointing **TILLSON** out to officers as the suspect, and observing him being taken into custody at the scene, Witness #1 was provided a single photograph of **TILLSON**, at which time he positively identified him as being the person who assaulted the Victim.

Witness #2 stated she works at Subway and was working when she observed the victim limping across the parking lot holding his side. Witness #2 stated an unknown male came into Subway and told her to call 911. Witness #2 stated when the unknown male opened the door she noticed the Victim was bleeding from his side. Witness #2 stated 911 told her what to do to help the Victim. Witness #2 stated the unknown male who told her to call 911 also said, "Mike stabbed him or Mike did it." Witness #2 said that when the unknown male told her

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he was pointing towards the park and was pointing at **TILLSON** who was not wearing a shirt. Witness #2 stated the police arrived and she watched them take **TILLSON** into custody.

Witness #3 is a delivery driver for Sarpino's Pizza located in Westport. As she walked out of the store to her vehicle, she heard arguing and observed a group of individuals in an area where homeless people frequent. She loaded her delivery vehicle with food, then got in the vehicle to drive away. As she was about to leave, she observed the victim lying on the ground behind her vehicle. **TILLSON** and Witness #1 were near the Victim. Witness #3 heard Witness #1 yelling at **TILLSON**, saying something about "not stabbing people." Witness #3 said she did not actually see the stabbing occur.

Witness #4 stated when he stepped outside of his business, he saw **TILLSON** standing above the victim, kicking him, screaming "Fuck you." The victim then stumbled across the street where Witness #4 noticed the victim was bleeding from unknown injuries. Witness #4 said the victim then collapsed in front of the Subway located at 905 Westport #E. Witness #4 described **TILLSON** as a white male, with shoulder length, dirty blonde hair and he was wearing no shirt and blue jeans.

TILLSON was still in the vicinity of the victim when police arrived. He was interviewed by detectives after being advised of his rights per *Miranda*. He stated he and the victim were arguing about a female when the victim "made a move" which he demonstrated by bringing his hands to his left hip. **TILLSON** said he believed the victim was "going to do something to me" so he took his folding knife which was clipped to his belt, opened it and stabbed the victim. **TILLSON** was very vague about what happened after that. A red folding knife was recovered from under **TILLSON**'s leg.

Printed Name Det. Darin Penrod #4288 Signature /S/ Det. Darin Penrod #4288

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

Judge

Circuit Court of _____ County, State of Missouri.