

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

|                         |            |
|-------------------------|------------|
| <b>POLICE NO. :</b>     | KC24009897 |
| <b>PROSECUTOR NO. :</b> | 095477909  |
| <b>OCN:</b>             |            |

|                              |   |                         |
|------------------------------|---|-------------------------|
| <b>STATE OF MISSOURI,</b>    | ) |                         |
|                              | ) | <b>PLAINTIFF,</b>       |
| <b>vs.</b>                   | ) |                         |
|                              | ) |                         |
| <b>DOMINIC M MILLER</b>      | ) |                         |
| <b>7700 E 111TH TER</b>      | ) | <b>CASE NO. 2416-CR</b> |
| <b>KANSAS CITY, MO 64134</b> | ) | <b>DIVISION</b>         |
| <b>DOB: [REDACTED]</b>       | ) |                         |
| <b>Race/Sex: B/M</b>         | ) |                         |
| <b>S.S.N.: [REDACTED]</b>    | ) |                         |
|                              | ) | <b>DEFENDANT.</b>       |

**AMENDED 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-  
 003Y20200999.0)**

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 February 14, 2024, 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 February 14, 2024, 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. 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 on or about February 14, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)**

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 February 14, 2024, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a crowd of people which included [REDACTED]

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 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 on or about February 14, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 3, 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 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.

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.

State vs. DOMINIC M MILLER, Case No.

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

/s/ Kristiane N. Bryant  
Kristiane N. Bryant (#69524)  
Assistant Prosecuting Attorney  
415 E. 12th St.  
Floor 7M  
Kansas City, MO 64106  
(816) 881-3597  
KNBryant@jacksongov.org

**WITNESSES:**

The State's witnesses as of 2/20/2024 are included on the "State's Witness List" filed contemporaneously with this Amended Complaint.

**PROBABLE CAUSE STATEMENT FORM**

Date: 02-16-2024

CRN: KC24009897

I, Detective Brian Cowan #5114 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 02-14-2024, at Pershing Road and Kessler Road in  
(Date) (Address)

Kansas City, Jackson Missouri DOMINIC M. MILLER  
(County) (Name of Offender(s))

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

The facts supporting this belief are as follows:

On 02-14-2024, Officers with the Kansas City, Missouri Police Department were working at the Kansas City Chiefs Super Bowl parade, located at 30 West Pershing Road, Kansas City, Jackson County, Missouri 64108. At approximately 1349 hours, Officers responded to sounds of shots in the area of Pershing Road and Kessler Road Kansas City, Jackson County, Missouri. Officers located multiple victims, one being deceased, suffering from apparent gunshot trauma and as a result, a homicide investigation was initiated.

An individual, later identified as **Dominic Miller**, was located suffering from apparent gunshot trauma in the center median of Pershing Road, just east of Kessler Road after a witness flagged Officers down. The witness told Officers he observed **Miller** running eastbound after the sound of gunshots and he heard him shouting, "I'm Shot, I'm shot." The witness further observed **Miller** carrying a black firearm near his waistband as he was running, so he tackled him and took the firearm from him. The firearm (black Taurus G3 9mm, S/N-ADD238968) was located in close proximity to **Miller** and it was guarded by the witness until he was able to alert Officers. **Miller** was transported to the medical tent located at the southwest corner of Union Station property by emergency medical personnel who utilized a red wagon to transport him. Medical personnel located a firearm magazine loaded with live ammunition in the red wagon used to transport **Miller** which was recovered by Officer at the scene. **Miller** was transported from the scene to University Hospital for further medical treatment.

On 02-15-2024, Detectives responded to KU Medical Center to interview a subject being treated for gunshot injuries sustained during the shooting at Union Station. During the interview with the subject, he stated he was at the parade with **Miller** when the shooting occurred and he believed **Miller** had been shot in the abdomen after hearing the information through social media. The subject stated **Miller** was wearing a red Calvin Klein zip up hoodie and a red Chiefs Super Bowl Champs jersey. The subject stated **Miller** was trailing behind him before the shooting started and he did not know where he went during or after the shooting because he took off running westbound after he got shot. The subject stated he did not see anyone else armed with a gun other than the person that shot him.

## PROBABLE CAUSE STATEMENT FORM

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After reviewing the video surveillance footage, witness statements and subsequent reports related to the homicide, it was determined **Miller** was the male suffering from apparent trauma in the center median of Pershing Road, just to the east of Kessler Road.

On 02-15-2024, Detectives responded to University Hospital, 2301 Holmes Street Kansas City, Jackson County, Missouri and recovered **Miller's** property bag from medical staff in charge of his care. An inventory of the contents of the bag were the following: tan Rock Revival jeans (cut and stained with apparent blood), a plaid and brown belt, gray Reebok boxer/briefs, purple lanyard, silver colored beads, sunglasses and a black iPhone in a black case. The hoodie (red Calvin Klein zip up) described by the subject at KU Medical Center was found to have been recovered at the crime scene, just outside the medical tent at the southwest corner of Union Station property. The hoodie was found to have an apparent circular defect to the left front pocket (torso) and spots of apparent blood.

After determining **Miller** was involved in the incident and having a physical description of him for comparison, Detectives reviewed surveillance video from the area of West Pershing Road and Kessler Road. In the video, an unidentified person, wearing what appears to be a red windbreaker jacket, is observed talking on his cellphone. Several feet away, another group of individuals (later identified as [REDACTED] and two other individuals – Group 1) appear to be staring at the individual wearing the red windbreaker jacket. Approximately 10 seconds later, three other individuals walk up next to the individual wearing the red windbreaker jacket (Group 2) and they all stare at Group 1. A verbal argument between the groups begins. A fourth individual then joins Group 2. At that time, [REDACTED] and another individual from Group 1, approach Group 2 and appear to get into a verbal argument. Approximately seven (7) seconds later, **Miller** and two other individuals start approaching Group 2, but **Miller** does not go all the way up to the group. One of the unknown individuals, from Group 2, starts to back up and removes the backpack he is wearing. Other members of Group 2 start to back up as well. **Miller** also briefly backs up, then positions himself in a crowd of people, several feet away to the side of [REDACTED] and Group 1, as if taking up a strategic position, while still watching the verbal argument between Group 1 and Group 2. **Miller** appears to have his hands tucked in front of him, while he is watching the argument. Shortly after taking up that position, [REDACTED] produces a firearm and starts to advance on an individual associated with Group 2. As [REDACTED] is chasing that individual, with his firearm pointed at him, **Miller** produces a firearm, points it in [REDACTED] direction from within the crowd. **Miller** chases after [REDACTED] and appears to begin shooting as he's in between two random people in the crowd. As **Miller** follows [REDACTED], an unidentified member of the group produces a firearm and begins to follow **Miller**. The unidentified member discharges his firearm and strikes **Miller** in the lower back, causing him to grab his back and fall to the ground. There is a large crowd of people, including the deceased victim, behind [REDACTED] in the direction that **Miller** is shooting. The people behind [REDACTED] appear to be watching the rally on the stage at Union Station. **Miller** appears to trip over a cone, while still shooting. **Miller** gets back up and leaves the scene running in a southeastern direction.

On 02-16-2024, Detectives responded to a local hospital and obtained a formal statement from **Miller** in regard to this investigation. Prior to the interview, **Miller** was advised of his Rights per Miranda which he waived. **Miller** initially told Detectives he and some friends who he named as [REDACTED] were at the rally, standing to the left of the main stage when he heard gunshots. **Miller** stated he began to run and was subsequently struck in the abdomen by gunfire. After being informed his actions had been captured on video, **Miller** admitted he had been armed with a Taurus G3 9mm handgun. After hearing

**PROBABLE CAUSE STATEMENT FORM**

CRN KC24009897

gunshots, he observed a black male with dreads armed with a black handgun shooting at him. **Miller** stated he returned fire with his own firearm. **Miller** estimated he fired 4-5 shots and was uncertain if he struck the individual he was shooting at. **Miller** claimed he did not see anyone else armed at the time of the shooting.

During the autopsy of the female victim, a 38 caliber class bullet was recovered from her body. A ballistic comparison of the bullet recovered from the female victim and the firearms recovered in relation to the homicide was conducted and it was determined the bullet recovered from the female was fired from the Taurus G3 9mm, the firearm **Miller** acknowledged possessing and firing.

Printed Name Detective Brian Cowan #5114 Signature /s/Detective Brian Cowan #5114

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

\_\_\_\_\_  
Judge

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

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

|                         |            |
|-------------------------|------------|
| <b>POLICE NO. :</b>     | KC24009897 |
| <b>PROSECUTOR NO. :</b> | 095477886  |
| <b>OCN:</b>             |            |

|                           |   |                         |
|---------------------------|---|-------------------------|
| <b>STATE OF MISSOURI,</b> | ) |                         |
|                           | ) | <b>PLAINTIFF,</b>       |
| <b>vs.</b>                | ) |                         |
|                           | ) |                         |
| <b>LYNDELL MAYS</b>       | ) |                         |
| <b>10103 E 67TH ST</b>    | ) | <b>CASE NO. 2416-CR</b> |
| <b>RAYTOWN, MO 64133</b>  | ) | <b>DIVISION</b>         |
| <b>DOB: [REDACTED]</b>    | ) |                         |
| <b>Race/Sex: B/M</b>      | ) |                         |
| <b>S.S.N.: [REDACTED]</b> | ) |                         |
|                           | ) | <b>DEFENDANT.</b>       |

**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-  
003Y20200999.0)**

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 February 14, 2024, in the County of Jackson, State of Missouri, Confidential Victim 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 February 14, 2024, 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. 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 February 14, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count 1, 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)**

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 February 14, 2024, [REDACTED] in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons, [REDACTED]

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 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 February 14, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count 3, 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 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.

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/ Hallie L. Schuman  
Hallie L. Schuman (#66333)

State vs. LYNDELL MAYS, Case No.

Assistant Prosecuting Attorney  
415 E. 12<sup>th</sup> Street, Floor 11  
Kansas City, Missouri 64106  
(816) 881-4488  
HSchuman@jacksongov.org

**WITNESSES:**

The State's witnesses as of 2/17/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

**PROBABLE CAUSE STATEMENT FORM**

Date: 02-17-24

CRN: KC24009897

I, Det. Grant Spiking #5484, 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 02-14-24, at West Pershing Road & Kessler Road in  
(Date) (Address)

Kansas City, Jackson County Missouri Lyndell Mays  
(County) (Name of Offender(s))

a black male committed one or more criminal offense(s).  
(Description of Identity)

Felony Murder  
Armed Criminal Action

The facts supporting this belief are as follows:

On 02-14-24, officers with the Kansas City, Missouri Police Department were working at the Kansas City Chief's Super Bowl Parade, located at 30 West Pershing Road, Kansas City, Jackson County, Missouri 64108. At approximately 1349 hours, officers responded to sounds of shots near West Pershing Road & Kessler Road. Twenty-Five victims, suffering from apparent gunshot wounds, were either located at the scene or at area hospitals. A 43-year-old female, who was among these victims, succumbed to her injuries and her death has been ruled a homicide by the Jackson County Medical Examiner's Office.

An individual, later identified as **Lyndell Mays**, was located suffering from apparent gunshot trauma, just to the north of West Pershing Road & Kessler Road. A pistol was located next to **Lyndell Mays**, as well as, spent shell casings. **Lyndell Mays** was transported to an area hospital for treatment.

Witness 9 was present at the time of the shooting. She responded to Police Headquarters, 1125 Locust Street, Kansas City, Missouri 64106, to give a statement. She stated herself and **Lyndell Mays** were at Kessler Road & Pershing Road. She stated a group of four males approached **Lyndell Mays** and one of the males asked **Lyndell Mays** what he was looking at, because they didn't know him. **Lyndell Mays** told Witness 9 he did not know who the individuals in the group were. Witness 9 stated one of the individuals had a backpack with a firearm hanging out of it. According to Witness 9, the two individuals pulled out firearms from their backpacks. Witness 9 tried to pull **Lyndell Mays** away so they could leave. As she turned her back, she heard gunshots. When she turned back around, she saw the group shooting at **Lyndell Mays**. She clarified and stated the incident happened fast and she only saw the individuals with their firearms out, but could not see who was shooting. After the individuals started shooting at **Lyndell Mays**, **Lyndell Mays** pulled out his own pistol and started returning fire. Witness 9 started to run away, and when she looked back at **Lyndell**, she observed him fall to the ground. She ran to **Lyndell Mays** and observed him suffering from apparent gunshot trauma. A still photo, from surveillance video at the scene, was shown to Witness 9. Witness 9 positively identified **Lyndell Mays** by circling him on the photo and writing "Lyndell." Witness 9 positively identified herself by circling

## PROBABLE CAUSE STATEMENT FORM

CRN KC24009897

herself and writing “me.” **Lyndell Mays** was observed wearing a red long-sleeved shirt. Witness 9 was observed wearing a white long-sleeved shirt.

Detectives interviewed Witness 9’s boyfriend (Witness 13). He stated a group of individuals approached **Lyndell Mays** and Witness 9 and they began arguing about why they were staring at each other. One of the individuals had a backpack and he could see a firearm inside it. Witness 13 stated at no time did the individual touch the firearm or make any threatening statements. Witness 13 also stated none of the individuals in the approaching group made threatening statements to him, Witness 9, or **Lyndell Mays**.

Detectives reviewed surveillance video and observed **Lyndell Mays** and Witness 9 standing near the West Pershing Road & Kessler Road intersection, just to the north. It appears **Lyndell Mays** gets into a verbal confrontation with a group of individuals standing several feet away from them. **Lyndell Mays** starts to approach the individuals in an aggressive manner, at which time Witness 9 puts her hand on **Lyndell Mays** in an attempt to stop him from advancing further. It appears Witness 9 and **Lyndell Mays** continue to verbally argue with the individuals in the group. **Lyndell Mays** backs up and appears to continue yelling at the individuals in the group, pointing his finger at them in an angry manner. **Lyndell Mays** circles behind a person, and pulls out a handgun with his right hand and points it at one of the individuals (later identified as [REDACTED]). At this time, none of the other individuals appear to have produced a firearm. As **Lyndell Mays** is chasing [REDACTED] while pointing his gun at him, the other individuals in the group pull out their firearms and point them in the direction of **Lyndell Mays** and appear to start shooting in his direction. [REDACTED], whom **Lyndell Mays** is pointing his gun at, is seen running away from **Lyndell Mays** and appears to be unarmed. **Lyndell Mays** continues to chase [REDACTED] as he is running away from him, and **Lyndell Mays** appears to be shooting at [REDACTED]. **Lyndell Mays** then appears to get struck by gunfire and falls to the ground. The individuals involved flee the area. Witness 9 runs up to **Lyndell Mays** and immediately strikes him with her fist, in an angry manner, two times. Just to the north of **Lyndell Mays**, the deceased victim is observed laying on the ground suffering from apparent gunshot trauma. [REDACTED] was transported to an area hospital with apparent gunshot trauma behind his left ear and his left ankle.

On 02-16-24 at approximately 2056 hours, detectives interviewed **Lyndell Mays** at an area hospital. **Lyndell Mays** was read his Miranda Rights, from Form 72 P.D. and he agreed to give a statement. **Lyndell Mays** stated he, Witness 9, and Witness 13 were at the parade near Pershing Road and Kessler Road. **Lyndell Mays** gave a statement of what occurred that was inconsistent with surveillance video at the scene. When **Lyndell Mays** was confronted that we had surveillance video of the incident, he then changed his story.

**Lyndell Mays** identified himself, Witness 9, and the others involved by circling them in a still shot taken from the surveillance video. **Lyndell Mays** acknowledged he pulled out his gun first and began firing his gun at the others first. **Lyndell Mays** was shown a still photo from surveillance video of him pointing a gun at one of the individuals. When asked what that individual was doing, who he was pointing the gun at, **Lyndell Mays** stated the individual was running away. **Lyndell Mays** stated he hesitated shooting because he knew there were kids there. **Lyndell Mays** stated they all could have had guns so he just randomly picked one of the individuals to target because he was in fear of Witness 9’s life. **Lyndell Mays** confirmed that he drew a gun first, in a crowd of people with kids, picked one of the individuals in the group at random, and started shooting, all because they said, “I’m going to get you” and to him, that meant, “I’m going to kill you.” **Lyndell Mays** stated the other

PROBABLE CAUSE STATEMENT FORM

CRN KC24009897

individuals started shooting only after **Lyndell Mays** shot first. **Lyndell Mays** initially stated he didn't think he shot his gun. When **Lyndell Mays** was advised he did shoot, he replied that he didn't hit anything though, but he knew it was still bad. **Lyndell Mays** then stated he only shot one (1) time. He then said maybe two (2) times. When asked why **Lyndell Mays** advanced on them to begin with, he replied, "Stupid, man. Just pulled a gun out and started shooting. I shouldn't have done that. Just being stupid." When reminded that the person **Lyndell Mays** was shooting at was running away from him, **Lyndell Mays** replied, "I know." **Lyndell Mays** confirmed he shot first and shot two times. **Lyndell Mays** acknowledged he shouldn't have pulled a gun out.

This incident occurred in the middle of a very large crowd of people who were there celebrating the Chiefs Super Bowl Parade. At this time, there have been 25 victims injured by gunfire, resulting from this incident, with one victim being fatally shot.

Detectives observed multiple 9mm and .40 caliber spent shell casings just north of the West Pershing Road & Kessler Road intersection. A Glock 9mm handgun [redacted] was observed on the ground, in apparent blood, where **Lyndell Mays** fell on the ground after being shot. The magazine contained six (6) live 9mm rounds in a 15-round capacity magazine. There was a live round in the chamber. A computer check revealed the firearm to be stolen out of Kansas City, Missouri.

Printed Name /s/ Det. Grant Spiking #5484 Signature /s/ Det. Grant Spiking #5484

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

\_\_\_\_\_  
Judge

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