United States District Court

WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA

v.

JACOB A. MORLEY,
[10/06/1998]

COUNT ONE:
(Felon in Possession of a Firearms)
18 U.S.C. §§ 922(g)(1) and 924(a)(8)
NMT 15 Years' Imprisonment
NMT $250,000 Fine
NMT 3 Years' Supervised Release
Class C Felony

$100 Mandatory Special Assessment (Each Count)

CRIMINAL COMPLAINT

Case Number: 26-MJ-00270-WBG

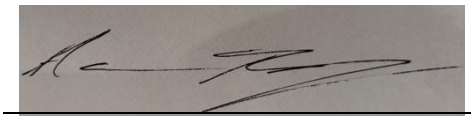
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT ONE
(Felon in Possession of a Firearms)

On or about November 3, 2026, in the Western District of Missouri, the defendant, JACOB A. MORLEY, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, a firearm and ammunition, to wit: a New England Firearms H&R 12 Guage shotgun, bearing serial number NY514267, a Tikka T3x .22 caliber rifle, bearing serial number K89758, and a Savage Model 112 .25 caliber rifle, bearing serial number G328691, all which had been transported in interstate commerce, all in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

I further state that I am a Aaron Riley, Deputy with the United States Marshal Service, and that this complaint is based on the following facts:

(See attached Affidavit)



Aaron Riley
Deputy United States Marshal

Sworn to ~~before me and subscribed in my presence~~,
By telephone at 8:50 pm, signature confirmed

November 3, 2026 at Kansas City, Missouri
Date City and State

HONORABLE W. BRIAN GADDY
United States Magistrate Judge
Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT

I, Aaron Riley, a Deputy with the United States Marshal (DUSMS) being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

This Affidavit is submitted in support of a criminal complaint and arrest warrant alleging that **JACOB A. MORLEY** (hereinafter **MORLEY**) for suspected violation(s) as follows:

Title 18 U.S.C § 922(g)(1)- Felon in Possession of a Firearm

1. I am a Deputy United States Marshal (DUSM) with the United States Marshals Service (USMS), United States Department of Justice, and have been so employed since September of 2020. As such, I am an "investigative or law enforcement officer of the United States" within the meaning of Title 18, United States Code (U.S.C.), Section 2510(7) that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code Section 2516.

2. I received my formal training at the Federal Law Enforcement Training Center (FLETC), located in Brunswick, Georgia, completing both the Criminal Investigator Training Program and Special Agent Basic Training. During these training programs at FLETC, I received specialized training in several law enforcement criteria, including but not limited to the following: writing of legal documents such as court orders, warrants, etc., the handling of evidence, search procedures, tactical and firearms training.

3. As an USMS Deputy, my duties and responsibilities include conducting criminal investigations of individuals and entities for possible violations of federal laws, tactical and

firearms training coordination, and fugitive apprehension. I have personally participated in and conducted criminal investigations pertaining to the illegal acquisition of firearms, possession of firearms by prohibited persons, smuggling of firearms, and investigations involving narcotics. As such, the result of many of these investigations have led to arrests, searches, and seizures of individuals and property involved in violations of Federal laws.

4. The information contained in this affidavit is based upon my review of the reports and files in the case, conversations with other law enforcement personnel, and my own personal knowledge and training and experience. Because of this affidavit's limited purpose of setting forth probable cause for a criminal complaint and arrest warrant, it does not contain all the facts known to me or other law enforcement officers about the investigation. Specifically, I have set forth only those facts I believe are necessary to establish probable cause in support of the criminal complaint and arrest warrant for **MORLEY (DOB:10/06/1998)**

Probable Cause Statement

5. On November 03, 2026, at approximately 09:30 a.m., the United States Marshals Service (USMS) Midwest Violent Fugitive Task Force (MVFTF) received information from United States Marshals Task Force in Tennessee, that **JACOB A. MORLEY**, White/Male 10/06/1998, escaped from a correctional facility in Tiptonville, TN and was in the Kansas City, Missouri metro area.

6. **MORLEY** was convicted of First-Degree Murder, Abuse of a Corpse, Tampering with Evidence and was sentenced to life imprisonment by the State of Tennessee. **MORLEY** was serving his sentence at the Northwest Correctional Complex in Tiptonville, Tennessee. On October 25, 2026, at approximately 11:30 p.m., **MORLEY** was unaccounted for during an inmate count.

MORLEY was observed on surveillance footage from the correctional facility wearing his correctional facility uniform breaching the correctional facility fence. Information was received that **MORLEY** fled to the Marion, Illinois area where're he stole a white Ford F-350, bearing Illinois license plate 16188VH. Further information was received that the Ford F-350 contained two (2) rifles and a shotgun.

7. The license plate to the stolen truck was entered into the license plate reader system. The license plate received hits from several license plate readers around I-35 Highway and Pleasant Valley Road, Liberty, Missouri. At this time USMS MVFTF members, members of the Kansas City Missouri Police Department's (KCMOPD) Career Criminal Unit (CCU), and I, Deputy United States Marshal Aaron Riley, began conducting an area canvas around I-35 Highway and between MO-152 Highway and MO-291 Highway for the vehicle.

8. Upon canvassing the area, the white Ford F-350 was located in the Savers parking lot, located at 300 Route M0-291 Highway, Liberty, Missouri. **MORLEY** was positively identified as the driver of the vehicle. **MORLEY** exited the Savers parking lot and began driving southbound on MO-291 Highway. At this time a mobile surveillance, utilizing unmarked covert police vehicles, was conducted on **MORLEY**. **MORLEY** drove the vehicle to MO-210 Highway where he began driving eastbound.

9. At this time the KCMOPD Police Helicopter assisted with the mobile surveillance of **MORLEY**. **MORLEY** drove for several miles eastbound on MO-210 Highway to Norborne, Missouri, where he turned off onto a gravel roadway, marked as County Road 350. **MORLEY** continued on the gravel road to the intersection of County Road 350 and County Road147, Norborne, Carroll County, Western District of Missouri, where he drove off road and got stuck in the mud, immobilizing his vehicle.

10. At this time, MVFTF members got behind **MORLEY** in their unmarked vehicles, exited their vehicles wearing ballistic vest with police markings and began giving **MORLEY** verbal commands to exit the vehicle. **MORLEY** followed the verbal commands and was taken into custody without incident.

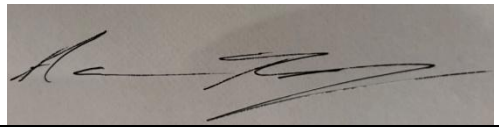
11. A tow was ordered for the vehicle by Missouri State Highway Patrol. Upon inventory of the vehicle a New England Firearms H&R 12 Guage shotgun, bearing serial number NY514267, a Tikka T3x .22 caliber rifle with a Vortex scope, being serial number K89758, and a Savage Model 112 .25 caliber rifle with a Burris Black Diamond scope, bearing serial number G328691, were located in the front passenger's seat of the vehicle. A box containing twenty-five (25) live 12-gauge shotgun rounds of ammunition, a box containing twenty-one (21) live 12-gauge shotgun rounds of ammunition, and twenty-three (23) loose live 12-gauge shotgun rounds of ammunition, were in the rear passenger's seat of the vehicle.

12. On November 3, 2026, at approximately 02:00 p.m., Supervisor Deputy United States Marshal Joshua Kohler and I, responded to Lafayette County Detention, located at 107 S 11th St, Lexington, MO, to interview **MORLEY** regarding his arrest. **MORLEY** was verbally given his Miranda Rights at 2:06 p.m. **MORLEY** stated he understood his rights and agreed to speak with me. **MORLEY** confessed to escaping Northwest Correctional Complex in Tiptonville, Tennessee. **MORLEY** admitted to stealing the white Ford F-350 and the New England Firearms H&R 12 Guage shotgun, bearing serial number NY514267, a Tikka T3x .22 caliber rifle with a Vortex scope, being serial number K89758, and a Savage Model 112 .25 caliber rifle with a Burris Black Diamond scope, bearing serial number G328691while he was in Marion, Illinois.

13. A computer check of **MORLEY** revealed him to be prohibited from possessing firearms, having prior felony convictions for the following:

1. On February 7, 2025, in Carter County, Tennessee, **MORLEY** was found guilty of First-Degree Murder, Abuse of a Corpse, and Tampering with Evidence and received a life sentence.

14. I consulted with ATF Special Agent Catherine Maynard, who is a Nexus expert. Agent Maynard stated the New England Firearms H&R 12 Guage shotgun, bearing serial number NY514267, a Tikka T3x .22 caliber rifle with a Vortex scope, being serial number K89758, and a Savage Model 112 .25 caliber rifle with a Burris Black Diamond scope, bearing serial number G328691, were not made in Missouri, therefore travelled in interstate commerce to get to Carroll County, Missouri.



Aaron Riley, Deputy
United States Marshal

Sworn to ~~and subscribed before me~~ this 3rd day of November 2026.

By telephone at 8:50 pm, signature confirmed



HONORABLE W. BRIAN GADDY
United States Magistrate Judge
Western District of Missouri