

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

|                         |           |
|-------------------------|-----------|
| <b>POLICE NO. :</b>     | 18-058606 |
| <b>PROSECUTOR NO. :</b> | 095447112 |
| <b>OCN:</b>             |           |

STATE OF MISSOURI, )  
 )  
 PLAINTIFF, )  
 )  
 vs. )  
 )  
 )  
 CURTRAIL J HUDSON )  
 )  
 11268 Bales Ave ) CASE NO. 1816-CR  
 )  
 Kansas City, MO 64137 ) DIVISION  
 )  
 DOB: 12/14/1999 )  
 )  
 Race/Sex: B/M )  
 )  
 )  
 )  
 )  
 DEFENDANT. )

## COMPLAINT

**Count I. Murder 2nd Degree (565.021-001Y19840903.0)**

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 August 1, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Xindong Hao by shooting 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 (571.015-001Y19755213.0)**

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 August 1, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in

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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 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.

### **Count III. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y19841304.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 1, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Vincent Main by shooting 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. 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 IV. 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

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571.015.1, RSMo, in that on or about August 1, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree 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.

### **Count V. Assault 1st Degree Or Attempt (565.050-002Y19791304.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 1, 2018, in the County of Jackson, State of Missouri, the defendant shot at the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

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 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 VI. 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

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571.015.1, RSMo, in that on or about August 1, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count 5, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree 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.

### **Count VII. 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 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 August 1, 2018, at 3604 E Bridge Manor Drive, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, i.e. a red Chevrolet truck.

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. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

**Count VIII. 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 August 1, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 7, 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.

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Bryan O. Covinsky

Bryan O. Covinsky (#47132)  
Assistant Prosecuting Attorney  
415 E. 12th Street, Fl 7M  
Kansas City, MO 64106

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(816) 881-3368

BCovinsky@jacksongov.org

**WITNESSES:**

1. DET Leland W. Blank, 1125 Locust, Kansas City, MO 64106
2. [REDACTED]
3. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106
4. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
5. DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106
6. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
7. Xindong Hao, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
8. [REDACTED]  
64106
9. [REDACTED]  
64106
10. PO Christopher M. Krueger, 1125 Locust, Kansas City, MO 64106
11. [REDACTED]
12. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
13. PO Christopher D. Wheeler, 1125 Locust, Kansas City, MO 64106

## PROBABLE CAUSE STATEMENT FORM

Date: 08-02-2018

CRN: 18-58606

I, Detective Daniel W. Frazier #5180

(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 08-01-2018, at 3604 Bridge Manor Dr in  
(Date) (Address)

Kansas City, Jackson Missouri Curtrail Hudson  
(County) (Name of Offender(s))

B/M 12-14-1999 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 8-1-2018 at 7:20 p.m., Officers were dispatched to 11300 Bales, Kansas City, Jackson County, Missouri on a suspicious party armed with a shotgun. The call was then updated to a shooting at 3604 Bridge Manor Drive, Kansas City, Jackson County, Missouri approximately two blocks east of the original dispatched address. Upon officers arrival a deceased asian male (victim #1) was found in front of 3604 Bridge Manor with several shotgun shell casings on the ground around him. An area canvas of the area revealed several additional shotgun shell casings were found in front of 11274 Bales. While at the scene responding Officers were given updates that an additional gunshot victim had been transported by private vehicle to a nearby hospital from the area of 11[REDACTED] Bales. Officers were then updated that another shooting victim had driven to a nearby church and contacted 911 saying he had been shot while driving through the area of 3300-blk of Bridge Manor Dr.

Victim #2 was contacted at the hospital and stated he was in front of his residence at 11[REDACTED] Bales Av when his neighbor from a few doors down from him came out of his residence and said "Hey!" He looked over and saw the suspect with a shotgun. The suspect shot at him several times striking the victim in his neck and back. The victim had his family transport him to a local hospital.

Victim #3 was contacted and stated he was driving northeast on Bridge Manor Drive in his Red Chevrolet truck when he saw the suspect shooting at victim #1 with a shotgun. The suspect then turned the gun and began shooting at his vehicle and he was grazed by a projectile. The victim drove to a parking lot away from the scene where he called Police.

Additional witnesses were contacted and stated the following:

Witness #1 was outside her residence when she observed a red truck was traveling north on Bridge Manor Drive and the suspect shooting a light colored rifle at the red truck. The suspect was running north on Bridge Manor Drive behind the red truck and continued to shoot as he ran. She then observed Victim # 2 running south on Bridge Manor

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Drive holding his neck. He got inside a maroon SUV and she heard a female state Victim # 2 had been shot and they were taking him to the hospital. She later observed the victim lying in the grass of a yard in the direction she saw the suspect running

Witness #2 was inside his house at 3604 Bridge Manor Dr. when he heard loud booming sounds in front of his house. When he looked outside he saw the deceased victim lying face down in his front yard. The witness heard more loud booms at which time he observed a heavy set black male with dreadlocks (suspect) holding a shotgun pointing it at the deceased victim. The suspect held the shotgun as though it was empty at which time the suspect approached the victim lying on the ground and hit him multiple times with the butt of the shotgun. The suspect then ran east and threw the shotgun into a storm drain located on the south east corner of Bridge Manor Dr. and Monroe Av. The suspect then ran south on Monroe out of the witness line of sight.

At 7:47 p.m., Officers were also dispatched to E. Red Bridge and Blue Ridge Boulevard on a disturbance. There they located family members of Curtrail Hudson B/M 12-14-1999. They stated they had received a phone call from Hudson who asked them to pick him up on Red Bridge. They knew Hudson to live on the west side of I-49 so they drove west on Red Bridge until they found Hudson walking east on Red Bridge and picked him up. They then drove east on Red Bridge when Hudson began "freaking out", and became assaultive. They stopped and Hudson got out of the vehicle. Hudson fell to the ground and responding Officers had Hudson transported to a local hospital as they believed him to be intoxicated on PCP. Hudson matched the description given by the victim's and witnesses and was taken into custody.

A search of the storm drain located at Bridge manor Dr. and Monroe revealed a shotgun in the bottom of the drain. The shotgun had apparent blood and human tissue on the end of the barrel.

Victim #2 was shown a photo array of the suspect and identified Hudson as the shooter.

Victim #3 was Shown a photo array of the suspect and identified Hudson as the shooter.

Witness #2 was shown a photo array of the suspect and identified Hudson as the shooter.

On 8/2/18 at 1250 hrs hours the suspect was transported to 1125 Locust for questioning. The suspect was advised of his Miranda Rights and agreed to talk with Detectives. The suspect began talking about him getting involved in a fight with his uncle. When detectives asked what led up to this fight, he said that his uncle had picked him up off of Red Bridge. When he was asked what occurred prior to him being picked up the suspect said, "I had a shotgun...they were shooting at me I shot three times". The suspect continued and stated he was outside of his townhome located in the 11200-blk of Bales Ct. when he asked victim #2 about him talking to the suspects sister. The conversation turned into an argument at which point the suspect states he shoots at victim #2 three times with a 12 gauge shotgun he was carrying. The victim runs away and the suspect believes he observes him reaching for a gun on his hip. The suspect shoots again at the victim. The suspects then runs east towards a cul-de-sac still in the 11200-blk of Bales Ct at which point he reloads his shotgun. The suspect then runs east along Bridge Manor Dr where he contacts an unknown male walking westbound in the 3600-blk of Bridge Manor Dr. The suspects believes he hears the unknown male say on the phone "he is right here." After hearing that phone conversation the suspect believes the unknown male is with victim #2 and after him. The suspect approaches the victim and shoots at him with the shotgun. The suspects thinks he keeps missing the victim. He shoots at him again at which time he could see the shotgun round strike the side of the victim and the victim fall to the ground. The suspect runs south towards Monroe Ct throwing the shotgun into a nearby storm drain. As he is running away he notices the shotgun did not fall all the way into the storm drain. The suspect runs back to the drain and kicks the gun so that it falls the rest of the way into the

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storm drain. He continues south on Monroe and jumps fences until he gets to another road. He see his family driving by which he had called prior to the shootings beginning and got into their vehicle. His family drives him to the area of Red Bridge and Blue Ridge where the suspect begins to argue and fight with the family members. The suspect and a family member begin fighting once their car stops. At that point the suspect and family begin to fight and the family member holds the suspect down until police arrive.

The suspect would not admit to striking the deceased victim with the shotgun. He also did not recall shooting at a person driving by in a red truck.

Printed Name Det. Daniel W. Frazier Signature /S/Det. Daniel W. Frazier #5180

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

\_\_\_\_\_  
Judge

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