

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

POLICE NO. :	18-011039
PROSECUTOR NO. :	095447250
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ZAIRE A WILLIAMS)	
2622 Cleveland Ave)	CASE NO. 1816-CR
Kansas City, MO 64127)	DIVISION
DOB: 05/31/2001)	
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 February 14, 2018, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to **David Willard** caused the death of David Willard 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 February 14, 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.


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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BCovinsky@jacksongov.org

WITNESSES:

1. 
64106
2. DET Chason C. Crowell, 1125 Locust, Kansas City, MO 64106

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3. DET Timothy M. Fitzgerald, 1125 Locust, Kansas City, MO 64106
4. DET Wayne C. Fitzner, 1125 Locust, Kansas City, MO 64106
5. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
6. PO Cody J. Johnson,
7. 
64106
8. DET Kristofer R. Oldham, 1125 Locust, Kansas City, MO 64106
9. David A Willard, 9035 E 52nd Street, Kansas City, MO 64133

PROBABLE CAUSE STATEMENT FORM

Date: 08-08-2018

CRN: 18-11039

I, Det. Chason Crowell 5228
(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 2-14-2018, at 2622 Cleveland in
(Date) (Address)

Kansas City, Jackson Missouri Zaire A. Williams
(County) (Name of Offender(s))

BM, 5-31-2001, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 2-14-2018 at about 1355 hours, Kansas City Missouri Police Officers were dispatched to 2622 Cleveland on a reported shooting. Upon arrival they found David Willard, BM, 11-1-1978 deceased on the kitchen floor from apparent gunshot wounds. The Jackson County Medical Examiner later declared his death a homicide due to gunshot wounds.

During the investigation witnesses told detectives that Willard had arrived at the house to give his daughter money for her cell phone bill.

Another witness related that Zaire Williams lived at the house and is schizophrenic and bipolar. He had been acting "Crazy" and paranoid that morning, locking and unlocking doors, continuously looking out windows and making statements like the world was against him and that people were trying to kill him. The witness related that she tried to calm Williams down then left him in the living room late that morning and went upstairs to bed with her boyfriend. The witness and boyfriend woke up to shots inside the house and when they went to investigate they saw Willard deceased from gunshot wounds laying on the kitchen floor and smelled gunpowder in the air. They saw Williams holding a gun and speaking incoherently. Williams was running around the house looking for a place to hide the gun then fled the scene on foot.

Another witness described the gun Williams had that morning as a brown colored rifle with a taped up butt stock and loaded with 2 magazines taped together.

During the crime scene investigation Ten .30 caliber shell casings were found near the body. During a search of the house detectives found a brown in color M-1 .30 caliber carbine with a taped butt stock hidden in the basement with 2 taped together magazines lying next to it.

On 2-16-2018, Williams was arrested in Warrensburg, Missouri and transported to police headquarters for questioning. Williams refused to answer the DJO's questions and attempted to grab his mother across the table several times.

PROBABLE CAUSE STATEMENT FORM

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Printed Name Chason Crowell Signature *Det. Col #5228*

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

Judge

Circuit Court of _____ County, State of Missouri.