

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**  
**AT INDEPENDENCE**

<b>POLICE NO. :</b>	19-054267
<b>PROSECUTOR NO. :</b>	095453980
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MATTHEW A. WOODWARD</b>	)	
<b>2212 E. 74th Street</b>	)	<b>CASE NO. 1916-CR</b>
<b>Kansas City, MO 64132</b>	)	<b>DIVISION</b>
<b>DOB: 10/02/1984</b>	)	
<b>Race/Sex: W/M</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-  
003Y19840999.0)**

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 July 14, 2019, in the County of Jackson, State of Missouri, Brian K. Jones-Woodruff was killed by being shot as a result of the attempted perpetration of the class A felony of Robbery in the First Degree under Section 570.023 RSMo committed by the defendant on or about July 14, 2019, 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.

**State vs. Matthew A. Woodward**

**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 July 14, 2019, 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 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. 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 (565.050-001Y19841305.0)**

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 July 14, 2019, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Archie Taylor by shooting Archie Taylor.

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.

**State vs. Matthew A. Woodward**

**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 571.015.1, RSMo, in that on or about July 14, 2019, 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. 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/ Hallie L. Williams  
Hallie L. Williams (#66333)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-4488  
hwilliams@jacksongov.org

**WITNESSES:**

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. PO Gabriel Coale, 223 N. Memorial Drive, Independence, MO 64050
3. DET Tyler Duke, 223 N. Memorial Drive, Independence, MO 64050
4. PO Jeffery Pagel, 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 7/30/2019

Report #: 2019-54267

I, Gabriel Coale, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 7/14/2019, at 1239 hours, Matthew A. Woodward, (Race- White, Sex- Male, DOB- 10/02/1984, Address-108 S. Osage Street, Buckner, MO 64016, ██████████ committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

The Defendant Matthew A. Woodward knowingly caused the death of Brian K. Jones Woodruff and serious injuries to ██████████ by shooting them with a 9mm handgun while riding through the parking lot of McDonald's, 11801 E. U.S. 40 Highway, Independence, Jackson County, Missouri 64055.

On 07/14/2019 at approximately 1239 hours, Independence Police Officers were dispatched to McDonald's. Upon the arrival of officers, two people were found to have been shot. The subjects were identified as Brian K. Jones Woodruff and ██████████. Both were taken to the hospital for medical treatment. Woodruff was pronounced deceased at the hospital.

Investigators were summoned to the scene. Investigators subsequently spoke with ██████████. ██████████ reported that he was leaving Walmart in his truck and was pulling onto the outer road just south of the McDonald's. He stated that as he was making the right hand turn he observed a white older model van, described as a mini-van, leaving the drive through lane. ██████████ stated that the passenger, a white male, dark complexion, wearing a blue bandana and sunglasses, began shooting a firearm at a group of black males. He stated that the suspect was slender and appeared to be tall, although he could not be sure since he was seated in a vehicle. He advised that he believed the suspect to be in his 40's. He stated the suspect had no facial hair. ██████████ advised that he thought the license on the suspect vehicle began with the letter "C" and was a Missouri issued plate.

Investigators in reviewing surveillance video and comparing it to witness statements identified a white Dodge Journey as the suspect vehicle. Several 9mm shell casings were recovered at the scene. After several witness interviews and confidential informant contacts, investigators were told that the Defendant was responsible for the death of Woodruff. A search warrant was applied for and granted for the cellular records of both the Defendant and Erica Williams (Woodward), the Defendant's wife. After the search warrant for the Defendants cell phone was executed, cellular data provided possible phone number information for calls made to the Defendant in close proximity to the time frame of the shooting. One of the calls documented came from 816-313-1183. A search of that number revealed that it came from Walmart, 11600 E. US 40 Hwy, Kansas City Missouri 64133 at 1217 hours on 7/14/19. On 7/30/19, investigators responded to the business and reviewed digital surveillance of the customer service phone, which was pointed out to us by the store manager as the only phone a customer would be allowed to use. After reviewing the video, it's observed that a white female with dark hair walked into Walmart from the KCATA bus stop and walked directly to the customer service desk. A phone call was made by the female, but it did not appear that she was able to make any contact. The female then walked away from the phone. A short time later a confidential informant familiar with people who frequent the area was shown a still photograph of the female that made the phone call. The confidential informant indentified the female as ██████████. Later in the afternoon on 7/30/19, ██████████ was located at the McDonald's where the initial shooting occurred. She was arrested on an outstanding warrant and then transported to police headquarters. She was then subsequently interviewed in reference to the events that occurred on 7/14/19 that lead to the death of Woodruff.

██████████ stated that on 7/14/19 she was in the area of Walmart when she ran into the other victim, ██████████. She stated she knows him as ██████████, and that he had been aggressive with her lately and had been threatening her. She advised that on 7/14/19 they became involved in an argument over a past incident that involved her bike being stolen. She stated

he pulled a “clip” out of his pocket and then threatened that he had a weapon in his backpack. She stated that she walked away from ██████ and that he followed her for awhile. ██████ advised that she walked into the Walmart and tried to call her friend who she identified as the Defendant. She advised that she was with the Defendant and Williams prior to being at Walmart at a nearby Metro PCS store. ██████ stated she called the Defendant to come pick her up because she knew they were in the area and she was scared. She stated that she did not get an answer, so she walked into the clothing department of the store ██████ advised that a short time later she observed Williams walk into Walmart. She stated that she contacted Williams and told her about ██████ following her around and the threats he made. ██████ advised they then walked outside and got into Williams’ white SUV and that the Defendant was driving. She stated that she informed the Defendant of what ██████ had said to her, and a plan was formulated that the Defendant would rob him of all his possessions. ██████ stated that Williams then got into the driver’s seat, the Defendant was in the front passenger seat, and she was in the back. ██████ advised that Williams then drove around the parking lot of Walmart and ██████ was spotted in the parking lot of McDonalds. She stated the Defendant then clarified that ██████ was the guy wearing all red. She confirmed that was him and they drove around the building. ██████ stated that she thought the Defendant was going to jump out and rob him, but instead he pulled out his gun and started shooting. She stated a male she knew as “BJ” (identified as Brian Jones Woodruff) was also standing there near ██████ and she observed him get hit with a bullet. She advised that “BJ” was her friend and that they look out for each other. ██████ advised she observed “BJ” fall to the ground as Williams rapidly sped away weaving in and out of traffic. ██████ stated she was upset about “BJ” getting shot and couldn’t even remember what route they took or where they went after the shooting occurred.

It should be noted that during the investigation, two days after the homicide occurred, Williams filed a police report that her vehicle had been stolen. The vehicle, a white Dodge Journey, bearing Missouri license plate CU0G7A was recovered in Independence, Missouri on 07/17/2019 and several occupants were taken into custody. Investigators interviewed ██████. ██████ reported he received the vehicle from a third party who he thought, had been in communication with the vehicle’s owner(s), who provided direction to damage the vehicle for “insurance money.”

Williams was later arrested and interviewed in reference to the above incident. Throughout the interview she provided false information, and when questioned about the false statements, she stopped the interview and requested an attorney. She continued to deny any and all involvement or knowledge of the incident, including being in the area around the time the incident occurred. After the search warrant was conducted on her cellular records, geographical data shows that Williams phone was in the area a short time before the shooting occurred.

A 9mm Smith & Wesson firearm (S/N FBA6249) was recovered by KCPD Detectives in reference to a separate investigation. This firearm was discovered to have been purchased by Williams in March 2019. The firearm was test fired by personnel with the KCPD Crime Laboratory and shell casings from the test firing were confirmed to match the 9mm shell casings from the scene.

Detective Gabriel Coale

/s/ Gabriel Coale

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Print Name

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Signature

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**  
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<b>POLICE NO. :</b>	19-054267
<b>PROSECUTOR NO. :</b>	095453982
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ERICA J. WILLIAMS</b>	)	
<b>2212 E. 74th Street</b>	)	<b>CASE NO. 1916-CR</b>
<b>Kansas City, MO 64132</b>	)	<b>DIVISION</b>
<b>DOB: 12/05/1986</b>	)	
<b>Race/Sex: B/F</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-  
003Y19840999.0)**

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 July 14, 2019, in the County of Jackson, State of Missouri, Brian K. Jones-Woodruff was killed by being shot as a result of the attempted perpetration of the class A felony of Robbery in the First Degree under Section 570.023 RSMo, committed by the defendant on or about July 14, 2019, 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.

**State vs. Erica J. Williams**

**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 July 14, 2019, 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 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. 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/ Hallie L. Williams  
Hallie L. Williams (#66333)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-4488  
hwilliams@jacksongov.org

**WITNESSES:**

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
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## PROBABLE CAUSE STATEMENT

Date: 7/30/2019

Report #: 2019-54267

I, Gabriel Coale, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 7/14/2019, at 1239 hours, Erica Janae Williams, (Race- Black, Sex- Female, DOB- 12/05/1986, Address-2212 E. 74<sup>th</sup> Street, Kansas City, Missouri 64132, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

The Defendant Erica J. Williams knowingly participated in a felony act, which caused the death of Brian K. Jones Woodruff and serious injuries to [REDACTED] by driving a vehicle, while Co-Defendant Matthew A. Woodward shot them with a 9mm handgun while driving through the parking lot of McDonald's, 11801 E. U.S. 40 Highway, Independence, Jackson County, Missouri 64055.

On 07/14/2019 at approximately 1239 hours, Independence Police Officers were dispatched to McDonald's. Upon the arrival of officers, two people were found to have been shot. The subjects were identified as Brian K. Jones Woodruff and [REDACTED]. Both were taken to the hospital for medical treatment. Woodruff was pronounced deceased at the hospital.

Investigators were summoned to the scene. Investigators subsequently spoke with [REDACTED]. [REDACTED] reported that he was leaving Walmart in his truck and was pulling onto the outer road just south of the McDonald's. He stated that as he was making the right hand turn he observed a white older model van, described as a mini-van, leaving the drive through lane. [REDACTED] stated that the passenger, a white male, dark complexion, wearing a blue bandana and sunglasses, began shooting a firearm at a group of black males. He stated that the suspect was slender and appeared to be tall, although he could not be sure since he was seated in a vehicle. He advised that he believed the suspect to be in his 40's. He stated the suspect had no facial hair. [REDACTED] advised that he thought the license on the suspect vehicle began with the letter "C" and was a Missouri issued plate.

Investigators in reviewing surveillance video and comparing it to witness statements identified a white Dodge Journey as the suspect vehicle. Several 9mm shell casings were recovered at the scene. After several witness interviews and confidential informant contacts, investigators were told that the Co-Defendant was responsible for the death of Woodruff. A search warrant was applied for and granted for the cellular records of both the Co-Defendant and Erica Williams (Woodward), the Co-Defendant's wife. After the search warrant for the Co-Defendants cell phone was executed, cellular data provided possible phone number information for calls made to the Defendant in close proximity to the time frame of the shooting. One of the calls documented came from 816-313-1183. A search of that number revealed that it came from Walmart, 11600 E. US 40 Hwy, Kansas City Missouri 64133 at 1217 hours on 7/14/19. On 7/30/19, investigators responded to the business and reviewed digital surveillance of the customer service phone, which was pointed out to us by the store manager as the only phone a customer would be allowed to use. After reviewing the video, it's observed that a white female with dark hair walked into Walmart from the KCATA bus stop and walked directly to the customer service desk. A phone call was made by the female, but it did not appear that she was able to make any contact. The female then walked away from the phone. A short time later a confidential informant familiar with people who frequent the area was shown a still photograph of the female that made the phone call. The confidential informant indentified the female as [REDACTED]. Later in the afternoon on 7/30/19, Hacker was located at the McDonald's where the initial shooting occurred. She was arrested on an outstanding warrant and then transported to police headquarters. She was then subsequently interviewed in reference to the events that occurred on 7/14/19 that lead to the death of Woodruff.



█████ stated that on 7/14/19 she was in the area of Walmart when she ran into the other victim, █████. She stated she knows him as █████, and that he had been aggressive with her lately and had been threatening her. She advised that on 7/14/19 they became involved in an argument over a past incident that involved her bike being stolen. She stated he pulled a “clip” out of his pocket and then threatened that he had a weapon in his backpack. She stated that she walked away from █████, and that he followed her for awhile. █████ advised that she walked into the Walmart and tried to call her friend who she identified as the Co-Defendant. She advised that she was with the Co-Defendant and Williams prior to being at Walmart at a nearby Metro PCS store. █████ stated she called the Co-Defendant to come pick her up because she knew they were in the area and she was scared. She stated that she did not get an answer, so she walked into the clothing department of the store. █████ advised that a short time later she observed Williams walk into Walmart. She stated that she contacted Williams and told her about █████ following her around and the threats he made. █████ advised they then walked outside and got into Williams’ white SUV and that the Co-Defendant was driving. She stated that she informed the Co-Defendant of what █████ had said to her, and a plan was formulated that the Co-Defendant would rob him of all his possessions. █████ stated that Williams then got into the driver’s seat, the Co-Defendant was in the front passenger seat, and she was in the back. █████ advised that Williams then drove around the parking lot of Walmart and █████ was spotted in the parking lot of McDonalds. She stated the Co-Defendant then clarified that █████ was the guy wearing all red. She confirmed that was him and they drove around the building. Hacker stated that she thought the Co-Defendant was going to jump out and rob him, but instead he pulled out his gun and started shooting. She stated a male she knew as “BJ” (identified as Brian Jones Woodruff) was also standing there near █████ and she observed him get hit with a bullet. She advised that “BJ” was her friend and that they look out for each other. █████ advised she observed “BJ” fall to the ground as Williams rapidly sped away weaving in and out of traffic. █████ stated she was upset about “BJ” getting shot and couldn’t even remember what route they took or where they went after the shooting occurred.

It should be noted that during the investigation, two days after the homicide occurred, Williams filed a police report that her vehicle had been stolen. The vehicle, a white Dodge Journey, bearing Missouri license plate CU0G7A was recovered in Independence, Missouri on 07/17/2019 and several occupants were taken into custody. Investigators interviewed █████ reported he received the vehicle from a third party who he thought, had been in communication with the vehicle’s owner(s), who provided direction to damage the vehicle for “insurance money.”

Williams was later arrested and interviewed in reference to the above incident. Throughout the interview she provided false information, and when questioned about the false statements, she stopped the interview and requested an attorney. She continued to deny any and all involvement or knowledge of the incident, including being in the area around the time the incident occurred. After the search warrant was conducted on her cellular records, geographical data shows that Williams phone was in the area a short time before the shooting occurred.

A 9mm Smith & Wesson firearm (S/N FBA6249) was recovered by KCPD Detectives in reference to a separate investigation. This firearm was discovered to have been purchased by Williams in March 2019. The firearm was test fired by personnel with the KCPD Crime Laboratory and shell casings from the test firing were confirmed to match the 9mm shell casings from the scene.

Detective Gabriel Coale

/s/ Gabriel Coale

Print Name

Signature