

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

**1716-CR05477-01  
Police# 17-107241  
Prosecutor# 095443040**

**AMENDED INFORMATION  
PRIOR/PERSISTENT OFFENDER**

**STATE OF MISSOURI**

**vs.**

**Charles V. Carter  
1717 N. Tennyson Street  
Kansas City, KS 66102  
DOB: 12/25/1995; Race/Sex: B/M;  
SS# XXX-XX-1128  
Defendant.**

**In the Circuit Court of Jackson County, Missouri, at Kansas City , Term, 2019. In Division Number 15 thereof, designated by the rules of said Court as Criminal Division 15.**

**Count I. Murder 2nd Degree (565.021-001Y198409110)**

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 December 24, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Abdi D. Sanweyne 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 (571.015-001Y197552130)**

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 December 24, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, 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.

**1. PRIOR OFFENDERS**

Defendant is a prior offender under Section 558.016, RSMo., in that he has pleaded no contest to a felony as follows:

1. On or about February 24, 2016, defendant pleaded no contest to the felony of aggravated assault in Wyandotte County, Kansas Case No. 15CR683.

**JEAN PETERS BAKER**  
**Jackson County Prosecuting Attorney**

by/s/Jennifer S Tatum  
Jennifer S Tatum (#70789)  
Assistant Prosecuting Attorney  
415 E. 12th Street Floor 7M  
Kansas City, Missouri 64106  
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**WITNESSES:**

[REDACTED]  
[REDACTED]  
[REDACTED]

CPT Everett C. Babcock , 1125 Locust, Kansas City, MO 64106

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

DET Timothy M. Perry , 1125 Locust, Kansas City, MO 64106

DET Hobart D. Price , 1125 Locust, Kansas City, MO 64106

PO Aaron Smith , 1125 Locust, Kansas City, MO 64106

PO Abel T. Teferi , 1125 Locust, Kansas City, MO 64106

DET Daniel G. Thomas , 1125 Locust, Kansas City, MO 64106

SGT Kevin Zoellner , 1125 Locust, Kansas City, MO 64106

## PROBABLE CAUSE STATEMENT FORM

Date: 12/26/2017

CRN: 17-107241

I, Detective Danny Thomas #4933

(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 12/24/17, at 307 Garfield Avenue in  
(Date) (Address)

Kansas City, Jackson Missouri Charles V. Carter Jr.  
(County) (Name of Offender(s))

B/M, 12/25/1995 committed one or more criminal offense(s).  
(Description of Identity)

Murder

ACA

The facts supporting this belief are as follows:

On 12/24/17 at approximately 1800 hours, Officers of the Kansas City, Missouri Police Department were dispatched to the area of 301 Garfield on a reported shooting.

Upon arrival the victim was discovered inside the foyer near the staircase at 301/303 Garfield Avenue, suffering from an apparent gunshot wound to his left shoulder. The victim was transported to an area hospital where he later died from his injuries. The case was ruled a homicide.

Other Officers responding to the scene were advised witness #1 was following the suspect from the scene and was currently in the area of 1900 Independence Avenue. The officers responded to the area and observed an individual running eastbound on the north side of Independence Avenue. Upon seeing the patrol vehicle the suspect ran southbound towards 2119 Independence Avenue (Brooklyn Market). The officers gave verbal commands for the individual to stop, however he continued running where he hid behind a dumpster on the south side of the Brooklyn Market. He was taken into custody without further incident. The officers checked the dumpster and discovered a dark colored handgun with an extended magazine on top of the trash. The suspect was later identified as **Charles V. Carter, black male, 12/25/1995.**

Witness #1 who followed the suspect from the scene stated he was in his vehicle in the area when he heard a gunshot, after which he observed a black male running past his vehicle. He stated he turned into the apartment complex and contacted a second witness who was standing near the victim who was suffering from a gunshot wound. Witness #2 advised him the person who shot the victim was the individual who just ran past his vehicle. Witness #1 turned around and followed the suspect until officers were able to take him into custody. Witness #1 identified the individual (Carter) as the person who ran past him at the apartment complex. During a formal interview witness #1 viewed a photo lineup consisting of six black males similar in appearance with Charles V. Carter in the #2 position. Witness #1 pointed to the photo of Carter and stated, "I think that's him". He took a second look and stated, "That's him right there".

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Witness #2 was interviewed and stated he was in the parking lot of the apartment complex waiting for witness #1 to pick him up, when he heard a single gunshot. Shortly thereafter the victim ran up to him and asked for help, stating he had been shot. He then saw an unknown male run out of the complex followed by witness #1 in his vehicle. He told witness #1 the victim had been shot and the shooter just ran out of the complex. Witness #1 followed after the suspect. Witness #2 was also shown a lineup of Charles V. Carter, but was unable to recognize anybody.

A third witness was located and interviewed. Witness #3 stated he was with the victim when they exited their vehicle in front of 305/307 Garfield Avenue. He stated he observed the suspect running towards them with a gun. Witness #3 immediately ran northbound and the victim ran eastbound carrying some bags of groceries and a Styrofoam cup of tea. He stated he heard a gunshot as he was running away. Detectives canvassed the area and discovered some bags of groceries in the snow nearby and a Styrofoam cup. A spent shell casing was also discovered nearby, which matched the caliber of the gun located in the dumpster by officers.

The spent cartridge case was determined to have been fired from the firearm recovered from the dumpster by a Forensic Specialist from the Kansas City Police Crime Laboratory.

Detectives obtained surveillance video from the Brooklyn Market which depicts Carter discarding something into the dumpster prior to his arrest.

Carter was interviewed regarding this incident and stated he was in the area visiting family. He stated he wasn't running from the police when he was contacted but merely hurrying across the street. He denied owning or possessing a firearm. After further questioning he stated he was done talking, at which time questioning ceased.

Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

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

\_\_\_\_\_  
Judge

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