

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

POLICE NO. :	KC19072291
PROSECUTOR NO. :	095456869
OCN:	HR008307

STATE OF MISSOURI,

PLAINTIFF,)

VS.

JORDAN L WHITE

5218 Euclid Ave

Kansas City, MO 64130

DOB: 08/11/2000

Race/Sex: B/M

DEFENDANT.)

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 September 21, 2019, in the County of Jackson, State of Missouri, Robiell Avilla was killed by being shot as a result of the attempted perpetration of the class A felony of Attempted Robbery in the First Degree under Section 570.023, RSMo committed by the defendant, or another, on or about September 21, 2019, in the County of Jackson, State of Missouri.

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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

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,

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committed the **felony of armed criminal action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about September 21, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, 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, or another, committed the foregoing felony of robbery 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. Attempted Robbery - 1st Degree (570.023-001Y20171299.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Sections 562.012, 570.023, and 558.011, RSMo, in that on or about September 21, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, demanded money, and such conduct was a substantial step toward the commission of the offense of Robbery in the First Degree of Robiell Avilla, and was done for the purpose of committing such robbery.

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 IV. Armed Criminal Action (571.015-001Y19755299.0)

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 September 21, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, committed the felony of Attempted Robbery in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant, or another, committed the foregoing felony of attempted robbery 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 statement(s) of facts filed contemporaneously herewith, 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/ Brady X. Twenter

Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
415 E. 12th St.
10th Floor
Kansas City, MO 64106
BTwenter@jacksongov.org

WITNESSES:

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1. [REDACTED]
64106
2. Robiell Avilla, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO
64106
3. SGT Andrew G. Dorothy, 1125 Locust, Kansas City, MO 64106
4. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
5. [REDACTED]
64106
6. PO Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
7. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
8. DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106
9. PO Westley A. Wasmer, 1125 Locust, Kansas City, MO 64106
10. [REDACTED]
64106

PROBABLE CAUSE STATEMENT FORM

Date: 01/04/2020

CRN: KC19072291

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 09/21/2019, at 9830 Willow in
(Date) (Address)

Kansas City, Jackson Missouri Jordan L. White
(County) (Name of Offender(s))

B/M, 08/11/2000 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

Murder
ACA
Aggravated Assault
Robbery

On 09/21/2019 at approximately 1652 hours, Officers of the Kansas City, Missouri Police Department were dispatched to the area of 9830 Willow, Kansas City, Jackson County, Missouri in regard to a disturbance, sound of shots. While the officers were responding the call was updated to a shooting with two victims shot.

Upon arrival the officers discovered two victims suffering from apparent gunshot wounds. Both victims were transported to an area hospital for treatment. One of the victims died from his injuries and the case was ruled a homicide. The second victim, ■■■ suffered non-life threatening injuries.

During the course of the investigation it was discovered a third victim, ■■■, who was not injured, was in the victim's vehicle when the shooting occurred. The third victim stated he and the other two victims' responded to the apartment complex to purchase marijuana. He stated when they arrived at the apartment complex one black male suspect entered the back seat of the vehicle and robbed him at gunpoint. He stated a second suspect began shooting from outside the vehicle, striking the driver and front passenger.

The third victim, ■■■ stated the marijuana transaction was coordinated via Snapchat from the deceased victim's phone, which was recovered by detectives. The phone was later analyzed and discovered to have made contact with several Snapchat user and display names the day the shooting occurred. One of the Snapchat users was, "marco5one"

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During the course of the investigation, PO Wasmer contacted detectives and advised he knew an individual named, [REDACTED], black male, 01/12/1999 to possibly be living at 9834 Willow Avenue with his sister. Due to the similar Snapchat name and the close proximity of the address to the crime scene and a description of the suspects given by witnesses, a photographic lineup containing the photograph of [REDACTED] was compiled.

On 09/25/19 detectives spoke with murder victim's father RA in regard to a possible suspect in his son's case. He informed detectives he had been contacted by victim [REDACTED] via phone. He stated [REDACTED] knew one of the suspects who was involved in the case. He subsequently sent a screenshot of the purported suspect's Facebook profile (LongLive Matt) to RA via text message. RA subsequently provided detectives with the screenshot. It should be noted RA later confirmed he received the photos from another friend of his son's.

The profile photograph for "LongLive Matt" depicts a black male with short hair wearing a white "Just Do It" t-shirt. RA also sent another photograph of three black males from the same Facebook profile. The photograph depicts three black males. The individual in the center of the photograph is wearing a blue shirt and appears to be the same individual who was wearing the "Just Do It" t-shirt.

The photograph of the individual wearing the "Just Do It" t-shirt was viewed by PO Wasmer who is familiar with associates of [REDACTED]. Wasmer stated he believed the individual in the photograph to be Jordan L. White, B/M, 08/11/2000. Detectives located a booking photograph of White, and subsequently compiled a photographic lineup to be shown to the living victims.

[REDACTED] (living victim) subsequently viewed two separate photographic lineups. The first consisted of six black males similar in appearance with Jordan L. White, black male, 08/11/2000 in the #5 position. [REDACTED] positively identified White as one of the suspects. He subsequently circled and initialed the photo of White.

The second photographic lineup consisted of six black males similar in appearance with [REDACTED], black male, 01/12/1999 in the #4 position. [REDACTED] was unable to identify anyone in the lineup because he only saw one suspect's face.

On 11/09/19 at approximately 1354 hours, detectives showed [REDACTED], the third victim, two photo lineups. The first photo lineup consisted of six black males similar in appearance with [REDACTED], black male, 01/12/1999 in the #4 position. [REDACTED] identified [REDACTED] as one of the suspects. He initialed, dated and circled the photograph.

The second photographic lineup also consisted of six black males similar in appearance with Jordan L. White, black male, 08/11/2000 in the #5 position. [REDACTED] identified White as the second suspect. He initialed, dated and circled the photograph.

On 01/03/2020, Jordan White was arrested and questioned in regard to this incident. Prior to questioning he was advised of his Miranda Rights. During questioning he stated he had been to the View High Lake Apartments sometime in early 2019 for a party, but not since. He stated he was unaware the murder occurred and he didn't know anyone who lived in the complex. During further questioning he requested an attorney.

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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.