

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

POLICE NO. :	KC20029655
PROSECUTOR NO. :	095459071
OCN:	HS019311

STATE OF MISSOURI,
PLAINTIFF,
vs.
MATTHEW D HARRIS
5306 Williamsburg Ct., Apt. 5
Kansas City, MO 64127
DOB: 02/25/1977
Race/Sex: B/M
DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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 May 6, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Cleveland Fuller, caused the death of Cleveland Fuller 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 May 6, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant

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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.

Count III. 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 May 6, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Michael L Groves, caused the death of Michael L Groves 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 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 May 6, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count Three, 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 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

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by,

/s/ Jordan R. Bergus

Jordan R. Bergus (#64729)

Assistant Prosecuting Attorney

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Kansas City, MO 64106

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WITNESSES:

1. [REDACTED]
64106
2. PO Nathan D Converse, 1125 Locust, Kansas City, MO 64106
3. Cleveland Fuller, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. Michael L Groves, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. [REDACTED]
64106
6. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
7. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
8. PO Rebecca L Miller, 1125 Locust, Kansas City, MO 64106
9. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
10. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
11. DET Bradley N Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 05-06-2020

CRN: KC20-029655

I, Detective Mary Kincheloe #5063

(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 05-06-2020, at 5401 E. Winner Road & 5306 Williamsburg Court in
(Date) (Address)

Kansas City, Jackson Missouri Harris, Matthew B/M 02-25-1977
(County) (Name of Offender(s))

Bald, Brown eyes, 5'08" 220lbs, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 05-06-2020, at 0251 hours, Officers of the Kansas City Missouri Police Department were dispatched to 5401 E. Winner Road in regard to a party armed/shooting the entrance glass door of the gas station. At 0258 hours, additional Officers of the Kansas City Missouri Police Department were dispatched to 5306 Williamsburg Court #6 (Green Leaf Apartments) on a reported shooting.

Officers arriving on the scene of 5306 Williamsburg Court encountered a party, later determined to be Harris, Matthew B/M 02-25-1977, exiting the south door of the apartment building. Officers advised that Harris told them someone had ransacked his apartment and stole his 45 caliber firearm. Harris then began to retrieve a black handgun, later determined to be a Hi-Point, 9mm Serial #P1921785, from his right jacket pocket. Harris was detained while officers cleared the dispatched apartment address. Officers located a deceased male, later determined to be Groves, Michael L. B/M 11-19-1977, in the hallway of the apartment, just outside the bathroom, suffering from an apparent gunshot wound. An uninjured female, witness #2, was located inside the apartment as well.

Officers at the dispatched address of 5401 E. Winner Road reviewed video surveillance and observed a B/M dressed in black clothing, red tennis shoes, a blue baseball cap, and a red COVID mask shoot a B/M dressed in a camoflauge hoodie and black pants who was standing in front of the glass doors. The victim was observed running eastbound onto a grassy area while the suspect fled on foot westbound out of the parking lot, across Hardesty Avenue in the direction of the Green Leaf Apartments. Due to what was observed in the surveillance video, Officers conducted a search and located a deceased B/M dressed in the clothing matching that of the person who was previously observed being shot at the glass doors of the gas station. The victim was identified as Fuller, Cleveland III B/M 10-12-1983.

The suspect observed shooting the victim at 5401 E. Winner Road matched the clothing being worn by Harris, Matthew B/M 11-19-1977 at the time he was detained by officers.

Witness #1 advised he was an employee of the business where the front glass doors were shot out. He did not witness the incident, but had surveillance footage that captured the incident. He was uninjured.

Witness #2 advised she was in the restroom of her apartment (#6) when she heard pounding at her front door. She then heard gunshots, yelling and the sounds of a scuffle. When she exited the bathroom, she observed her front door standing open and Groves, her cousin, covered in blood. Groves told her he had been shot, so she called 911 and tried to render aid. Witness #2 advised she had only lived in her apartment for a week. Upon moving in, the witness said Harris blocked

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her in the stairwell. He told her he wanted to get to know her and pounded on her door a few nights ago. She did not answer her door, but could see Harris through the peep hole. The witness was later told by a neighbor Harris, who reportedly resided in Apt #5, was "crazy." The witness was presented with a photograph of Harris to which she identified him as the person who had confronted her in the stairwell and pounded on her door a few nights ago. The witness did not observe the shooting of Groves.

A search warrant was obtained for 5306 Williamsburg Ct. Apt. #5 and #6. There was an apparent defect in the front door of the Apt. #6. Apparent blood was observed throughout the entryway, down the hallway and in the bathroom of Apt. #6. There were no firearms or shell casings located inside Apt. #6 or in the hallway near Apt. #6. There was an empty holster on the floor of the bedroom and eighteen (18).38 S&W PPU live rounds in the closet of the bedroom.

Apt. #5, was observed to be in complete disarray. A Comanche 38 Special Revolver, Serial #251468, was located on the backrest of the overturned couch. There were five (5) spent casings, bearing the headstamp Winchester 38 SPL + P located inside the cylinder of the revolver and one cylinder was empty. Live rounds bearing the same headstamp Winchester 38 SPL + P were located inside the residence of Apt. #5. A Cobra .380 Serial #FS116599 FS.380, a Keltec firearm bearing the serial #21427, a Jimenez JA9 firearm bearing the serial #159301, and a GSG 22, Serial #F418410 were also found inside the residence. There were live rounds bearing the headstamp FC 9mm Luger along with several other live rounds.

CSI Frobenius, Simmons, and Kuhn responded to the scene at 5401 E. Winner Road where nine (9) 9mm shell casings, four (4) of which contained the headstamp of FC 9mm Luger.

Harris was arrested and transported to East Patrol Division for booking. Harris spontaneously uttered "it started at the gas station...someone shot at me so I shot back." It should be noted the shooting incident captured on surveillance video does not reveal victim #1 to fire a weapon at Harris at 5401 E. Winner Road. It further revealed victim #1 to walk directly past Harris toward the front door of the gas station without acknowledgement or physical/verbal confrontation. Upon examination of victim #1, he was not found in possession of a firearm. Harris appeared to be under the influence at the time of his arrest.

Printed Name Det. Mary Kincheloe Signature /s/ Det. Mary Kincheloe #5063

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

Judge

Circuit Court of _____ County, State of Missouri.