

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

POLICE NO. :	KC20037320
PROSECUTOR NO. :	095459438
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
KHALID C. HERON-BOONE	)	
7920 Sycamore Ave., #7	)	CASE NO. 2016-CR
Kansas City, MO 64138	)	DIVISION
DOB: 05/12/1994	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 June 7, 2020, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly or with the purpose of causing serious physical injury to Matthew Cox caused the death of Matthew Cox by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Matthew Cox as a result of the attempted perpetration of the class A felony of robbery in the first degree under Section 570.023, committed by defendant.

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.

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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, committed the felony of **armed criminal action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about June 7, 2020, 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. 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. Robbery - 1st Degree (570.023-001Y20171204.0)

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 A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 7, 2020, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, forcibly stole a wallet and U.S. currency in the possession of Matthew Cox, and in the course thereof defendant or another was armed with a deadly weapon.

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 (571.015-001Y19755299.0)

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 571.015.1, RSMo, in that on or about June 7, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of robbery 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

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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/ Paul M. Conklin III
Paul M. Conklin III (#66958)
Assistant Prosecuting Attorney
415 E. 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3824
PTConklin@jacksongov.org

WITNESSES:

1. [REDACTED] Floor, Kansas City, MO 64106
2. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
3. PO Eric L. Hoskins, 1125 Locust, Kansas City, MO 64106
4. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
5. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
6. DET James H. Price, 1125 Locust, Kansas City, MO 64106
7. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
8. DET Timothy R Taylor, 1125 Locust, Kansas City, MO 64106
9. [REDACTED]
10. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/07/2020

CRN: 20-037320

I, Detective Bonita Cannon, #4585, Kansas City Missouri Police Department
(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 06/07/2020, at 4124 Troost Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Khalid Heron-Boone
(County) (Name of Offender(s))

B/M 5/12/1994, [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 06/07/2020 at approximately 0650 hours, officers of the Kansas City, Missouri Police Department were dispatched to 4121 Harrison on ShotSpotter sounds of shots call for service. Enroute officers were informed a shooting was reported at 4124 Troost Avenue.

Upon their arrival a male was found in the rear of the address suffering from an apparent gunshot wound to his upper left chest. The victims pockets were turned out. KCFD/EMS responded and transported the victim to St. Luke's on The Plaza. The victim was declared deceased.

Witness #1 juvenile [REDACTED] stated he was at his friend's house HERON-BOONE. He stated the victim and HERON-BOONE were getting ready to leave. [REDACTED] stated HERON-BOONE said "Wait," and did not exit the apartment with the victim and [REDACTED].

Witness [REDACTED] stated as he and the victim, were in the parking lot, he heard who he believed to be HERON-BOONE, yell, "Oh shit," after the gunshot. [REDACTED] stated he ran around to the front of the building across Troost Avenue. Witness [REDACTED] stated then he sees HERON-BOONE at the front of the building, yelling "Come back, you're ok." Witness #1 [REDACTED] stated he did not see HERON-BOONE in the rear parking lot when the shooting occurred. Witness [REDACTED] described HERON-BOONE wearing a puffy jacket and a black COVID-19 mask. He stated as he looked before going into the apartment building he observed a red Chevrolet Monte Carlo leaving the rear parking lot. [REDACTED] stated he knows Heron-Boone's brother "Tez," drives the same (make, model and color) vehicle.

HERON-BOONE stated he was at his residence with juvenile witness (JB) and the victim. They had been up all night doing "coke" and playing "Call of Duty." He said around 0600 hours they went outside, and was hanging out in the rear of the building. At some point they were going to leave and get more cocaine, when he heard someone yell "Get down," at which time he ran. As he did so, he heard a gunshot and the victim utter, "Ah". HERON-BOONE stated when he looked back the victim was on the ground. HERON-BOONE stated he then

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went back into his apartment to call 911. HERON-BOONE stated he could not describe the suspect other than he was wearing a black mask.

Information was received during this investigation that the suspect, is a tenant who lives in apartment #1 of 4124 Troost. The suspect was described as wearing a dark colored coat, red shoes and sweatpants. It was later determined HERON-BOONE lives at 4124 Troost Apt. #1. While Heron-Boone was at Police Headquarters he was wearing, red sweatpants, red shoes and a dark colored jacket.

After this information was received, and during the time Khalid HERON-BOONE B/M 05-12-1994 was being processed, he requested an attorney.

Witness [REDACTED] stated, after asking whether HERON-BOONE was still at Police Headquarters and being told HERON-BOONE is no longer at Police Headquarters, that HERON-BOONE told him to take the victim's firearm. Witness [REDACTED] stated he told HERON-BOONE, 'No,' to which HERON-BOONE told him to quit being a "bitch." Witness [REDACTED] stated before the victim arrived, one of the females present told him they were not doing anything inside of the apartment.

During an execution of a search warrant for 4124 Troost #1, witness [REDACTED] and her cousin were inside of the apartment. Both voluntarily responded to Police Headquarters, 1125 Locust.

Witness [REDACTED] stated she is the ex-girlfriend of HERON-BOONE. She stated she and her [REDACTED] left the address, returning in the early morning hours. [REDACTED] stated when she returned HERON-BOONE and [REDACTED] were still there. She stated at some point during their conversation, HERON-BOONE and [REDACTED] talked about robbing the victim. HERON-BOONE contacted the victim and asked him to come over to talk. When the victim arrived, HERON-BOONE went outside to meet the victim.

[REDACTED] stated HERON-BOONE sent her three text messages that consisted of:
"Tell him to come out here n strip him"
"Stop him before he come out"
"N tell him run around to the front of the side of the apt"

[REDACTED] stated she responded after telling [REDACTED] what they are doing is stupid, and [REDACTED] told her "No." [REDACTED] was stating that he did not want to participate in the robbery)-
"He said to come in here real quick"
"To not do it that ya'll can really get connected"

[REDACTED] stated Heron-Boone and the victim came into the apartment. She stated she then went to bed around 0530 or 0630 hours and fell asleep. She stated she was awakened by Heron-Boone asking her to call 911, because the victim had been robbed and shot. She stated she told him no and handed him her cell phone. She stated [REDACTED] came into the apartment and told Heron-Boone the victim was going to snitch.

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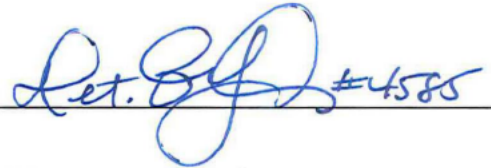
█ stated since Heron-Boone has been in custody he called her from detention and told her to get his clothes, and his cell phones. He also told her he left some money under the bed for her. Witness █ stated that HERON-BOONE uses two cell phones. She described one as a gold colored iPhone and the other as a red iPhone.

While at the scene, detectives located inside of the victim's vehicle, approximately \$1200 in US Currency, folded in half, wrapped in a rubber band. There was no firearm located at the scene.

A search warrant was granted by the Honorable Judge Keal, Jackson County Circuit Court, for 4124 Troost Ave, apartment #1. While executing that search warrant, Detectives located two cell phones on the living room table. One is a Rose Gold colored iPhone with a broken screen and a broken rear cover, and with a yellow-colored see-through phone case. One is a red iPhone with a dual camera and no case. Both phones were seized pursuant to the search warrant. Also during the execution of the search warrant detectives observed \$810 folded in half, under the mattress in the southwest bedroom of the apartment (reportedly belonging to witness █). The US Currency was next to a wallet that looked like a one hundred dollar bill.

Printed Name Det. Bonita Cannon, #4585

Signature



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

Judge

Circuit Court of _____ County, State of Missouri.