

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC20043882
PROSECUTOR NO. :	095459786
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
NERVILLE AWUH)	
1301 N 129th St.)	CASE NO. 2016-CR
Kansas City, KS 66109)	DIVISION 32
DOB: 09/18/1990)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y19840911.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about July 2, 2020, in the County of Jackson, State of Missouri, the defendant, after deliberation, knowingly caused the death of Pierre C Hill-Williams by shooting him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years 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

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571.015.1, RSMo, in that on or about July 2, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree as charged in Count I, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Murder 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. 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/ P. Benjamin Cox
P. Benjamin Cox (#60757)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, MO 64106
(816) 881-3975
BCox@jacksongov.org

WITNESSES:

1. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
2. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106

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3. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. Pierre C Hill-Williams, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
6. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. DET Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO 64106
9. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
10. DET Bradley N Thomas, 1125 Locust, Kansas City, MO 64106
11. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07/03/2020

CRN: KC20-043882

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 07/02/2020, at 3500 Prospect Avenue in
(Date) (Address)

Kansas City, Jackson Missouri Awuh, Nerville B/M 09/18/1990
(County) (Name of Offender(s))

5'10, 200lbs, Blk hair, brown eyes committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07-02-2020, at 2207 hours, Officers of the Kansas City Missouri Police Department were dispatched to 3500 Prospect Avenue, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, Officers located an unknown, black male, later identified as Hill-Williams, Pierre Calvin B/M 11-19-1993 with an apparent defect in the back of his head. He was confirmed deceased by KCFD Medic 35. There were no shell casings located at the scene.

Exterior surveillance video capturing the northwest portion of the Conoco Gas Station at 3500 Prospect Avenue, revealed the suspect vehicle to arrive, park facing west at a gas pump on the north side of the Conoco Gas Station and enter the store. The suspect was observed to be a black male, wearing a dark gray tank top, black athletic pants with a white strip and red tennis shoes. The suspect exited the store, entered his vehicle but did not leave the parking lot. The victim is then observed to arrive as a passenger in a white sedan and enter the store. Approximately one minute later, exterior surveillance video revealed as the victim exited the store, he encountered the suspect who was attempting to enter the store for a second time. The two appear to have a minor verbal confrontation lasting approximately 20 seconds. On the interior surveillance video, the suspect is observed to make a purchase with a Debit Card while the exterior surveillance video captured the victim just outside the north glass door leaning into a black Cadillac SUV, talking to the occupants. As the suspect exited the store, two exterior surveillance video angles captures the suspect extending his right arm and fire what appears to be one shot at the back of the victim's head. The victim immediately drops to the ground. The suspect is observed to place the firearm into his waistband and walk with ease to the suspect vehicle. The suspect vehicle is observed leaving the parking lot westbound on E. 35th Street. The Cadillac SUV and its occupants leave the scene, but not before a customer kicks the victims feet out of the way to prevent the Cadillac SUV from running over the victim. The white sedan the victim had previously arrived in, left the scene prior to police arrival after one of the occupants ran passed the victim to get into the sedan.

On 07-03-2020, an occupant () of the Cadillac SUV was located and said he knew the victim in passing. He said the victim and the suspect exchanged words, but he was not certain what was said. . said he heard one of

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them say something to the effect of “You good, man?” to which the other one responded, “Yeah.” ■■■ said he then witnessed the suspect shoot the victim in the head. ■■■. was shown six individual male photographs similar in appearance. ■■■. was unable to identify the suspect of the homicide.

A security guard for a private company driving west on 35th Street, heard one gunshot. He turned around and entered the parking lot of 3500 Prospect Avenue to render aid to the victim while also waiting for police arrival.

Upon reviewing the surveillance video, the suspect was observed on interior surveillance video to have two transactions using a debit card for the purchase of what appeared to be a bottle of water and a bottle of juice. The receipts, which reflected and Debit card account number ending in 2956, for the amount of \$9.40 on one receipt and \$5.19 on another, were collected from the trash can located behind the counter, while processing the crime scene.

On 07-02-2020, a computer search of city cameras and license plate readers revealed just prior to the homicide a 2019 Nissan Altima bearing an Illinois license plate of FP68551 traveling north on Prospect at 39th Street. This vehicle continued north where it was observed pulling into the Conoco Gas Station located at 3500 Prospect Avenue. The vehicle parked facing west at the north facing gas pump. This is identical to the suspect vehicle’s parking position captured on the gas station’s surveillance video system. The suspect is observed on the city cameras, exiting the vehicle wearing the same clothing observed on the gas stations surveillance video as well. A search of the license plate revealed it to belong to Enterprise Leasing Company.

On 07-03-2020, Enterprise Leasing Company was contacted and advised **Awuh, Neville B/M 09/18/1990** was on the rental agreement for the listed vehicle. The address provided on the rental agreement for **Awuh, Neville** was 1301 N 129th Street #304 in Kansas City, Wyandotte County, Kansas.

On 07-03-2020, contact was made with an Investigative Analyst at Community America Credit Union. The analyst was provided the last four digits, 2956, of the Debit card observed on the receipt of the items purchased by the suspect. The analyst advised an account was located in the name of **Awuh, Neville**. The account revealed two transactions on 07-02-2020 at 2230 hours in the amount of \$9.40 and \$5.19 at 3500 Prospect Avenue.

A computer search for a DOR photograph was conducted for **Awuh, Neville B/M 09/18/1990** which yielded Kansas driver’s license. The DOR photograph and the suspect in the surveillance video had similar characteristics and was believed to be the same individual.

On 07-03-2020, Kansas City Kansas Police were provided the above collected information on **Awuh, Neville B/M 09/18/1990**, his address and the vehicle information. On 07-03-2020 at 1306 hours, Kansas City Kansas Police took **Awuh, Neville** into custody without incident and transported him to 700 Minnesota Avenue in Kansas City, Kansas. The 2019 Nissan Altima was also located in the parking lot of the residence.

On 07-03-2020, a Search Warrant, signed by Judge Myers of the 29th Judicial District of Kansas, was executed on the residence of 1301 N 129th Street #304 in Kansas City, Wyandotte County, Kansas. Items of note collected from the residence are the following: in a water filled cooking pot atop the stove was a dark gray tank top, black athletic pants with a white stripe located on the floor of the dining room, a wallet inside the athletic pants with a

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KDOR driver’s license bearing the name, **Awuh, Neville B/M 09/18/1990**, a Community American Visa Debit card ending in 2956, bearing the name, **Awuh, Neville B/M 09/18/1990**, on the floor near the couch a water bottle, similar in appearance to the one purchased by the suspect with his debit card, and located in a night stand were (11) 38 Special spent shell casings.

On 07-03-2020, a Search Warrant, signed by Judge Myers of the 29th Judicial District of Kansas, was executed on the 2019 Nissan Altima bearing an Illinois license plate of FP68551. Inside the vehicle were leasing agreement papers bearing the name **Awuh, Neville**, (3) Federal 38 Special live rounds, (2) Hornady 38 SPL live rounds, (3) 22 caliber C live rounds, (10) Super X22 live rounds, (1) 22 caliber F live round, a glass bottle of Pure Papaya Punch juice similar in appearance to the one observed on surveillance video being purchased by the suspect with his debit card.

On 07-03-2020, a Search Warrant, signed by Judge Myers of the 29th Judicial District of Kansas, was executed for the collection of BUCCAL swab of **Awuh, Neville B/M 09/18/1990** to be compared to items of evidentiary value collected during the investigation.

On 07-03-2020, at 1720 hours, Det. Price and I responded to 700 Minnesota, Kansas City Kansas Police Investigations Division, to interview **Awuh**. At 1722 hours, **Awuh** was read aloud his Miranda Rights and began answering questions on the Detective Interview Form. **Awuh** advised he drove a 2020 Nissan Sentra, a dark blue or black in color vehicle, leased from Enterprise Rental Company. **Awuh** said he was in Kansas City last night, driving around, drinking and listening to music. **Awuh** was shown a still photograph captured from the surveillance cameras at 3500 Prospect Avenue. **Awuh** said he did not know if it was him in the photograph. **Awuh** acknowledged he wears clothes like what is captured in the photograph. Det. Price asked **Awuh** where those clothing items would be to which **Awuh** said, “In my house.” When asked what he was doing in the still photograph shown to him, he wanted to know where the photograph was taken. I advised, **Awuh** it was taken at the gas station at 35th and Prospect to which **Awuh** said he saw a shooting on the news. I advised **Awuh** this was the investigation we working to which **Awuh** hung his head on the table in front of him said he wanted an attorney. The interview was concluded when he asked for his attorney.

Printed Name Det. Mary Kincheloe #5063 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.