IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

POLICE NO. :	KC21002570
PROSECUTOR NO.:	095462690
OCN:	
STATE OF MISSOURI,)
PLA	INTIFF,)
VS.)
)
TRAVON M. WILLIAMS)
3646 Olive St.) CASE NO. 2116-CR
Kansas City, MO 64109) DIVISION
DOB: 07/04/1995)
Race/Sex: B/M)
)
DEFE	NDANT.)
COMI	DI AINT

COMPLAINT WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y20200912.0)

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 January 12, 2021, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Linda H Gantt by shooting her and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), RSMo, it will be based on the death of Linda Gantt as a result of the perpetration of the class B felony of shooting at or from a motor vehicle under Section 571.030(9), RSMo, committed by the defendant or in the alternative as a result of the class B felony of shooting at a person under Section 571.030(9), RSMO, committed by the defendant.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. 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 (571.015-001Y20205213.0)

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 571.015.2, RSMo, in that on or about January 12, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of murder first degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder first degree by, with and through, the knowing use, assistance and aid of a deadly weapon and on or about January 24, 2019, in Circuit Court of the County of Jackson, State of Missouri, the defendant was convicted of the offense of armed criminal action under case number 1616-CR04388-01.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y20201006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the **class B felony of kidnapping in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about January 12, 2021, in the County of Jackson, State of Missouri, defendant unlawfully removed from the 3600

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block of Olive St. the place where was found by defendant, without s consent by means of forcible compulsion for the purpose of facilitating the flight after the commission of the felony of murder first degree, charged in count I.

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 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 (571.015-001Y20205212.0)

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 571.015.2, RSMo, in that on or about January 12, 2021, in the County of Jackson, State of Missouri, the committed the felony of kidnapping first degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of kidnapping first degree by, with and through, the knowing use, assistance and aid of a deadly weapon and on or about January 24, 2019, in Circuit Court of the County of Jackson, State of Missouri, the defendant was convicted of the offense of armed criminal action under case number 1616-CR04388-01.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to

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Section 571.015, RSMo shall be in addition to and consecutive 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/ Daniel Portnoy

Daniel Portnoy (#62186) Assistant Prosecuting Attorney 415 E. 12th St., 11th Floor Kansas City, MO 64106 (816) 881-3286 dportnoy@jacksongov.org

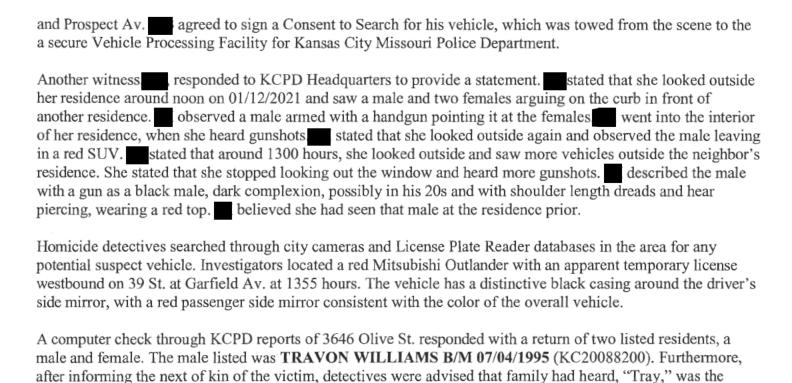
WITNESSES:

	TIT (EBBES)
1.	
	64106

10. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106

Date: 01/12/2021		CRN: KC21002570			
I, Detective Sean Patrick Martin, # (Name and identify law enforcement of			obable cause.)		
knowing that false statements on this	form are punish	able by law, state	that the facts cor	ntained herein are true.	
I have probable cause to believe that	on 01/12/2021 (Date		646 Olive St (Add	iress)	
Kansas City, Jackson (County)	Missouri _	Travon Williams	(Name of Offender	r(s))	
B/M, 07/04/1995 (Description of Ide	entity)	comm	nitted one or more	e criminal offense(s).	
	antey)				
The facts supporting this belief are as	s follows:				
On 01/12/2021 at 1355 hours, Officers Olive St in regard to a Shotspotter active came in from that area in regard to the clocated in a vehicle by Tactical Responsave a shattered rear window. That vict pronounced deceased, as a result of her victim's death as a homicide.	vation / sound of s shots fired. Office se Team officers tim was transport	shots call. Dispat ers were further a at 45 St / Prospe ted To Research N	ch updated office dvised that a gun ct Av. The vehicle Medical Center, w	ers that multiple calls ashot victim was e was observed to where she was later	
Officers responding to 3646 Olive St. le casings, 2 bullet fragments and a single			_		
Parties on scene advised officers that ar resident of 3624 Olive St. drives a red, with a handgun outside the residence le shooting.	newer model SU	V. The neighbor	advised that the p	arty who was armed	
The driver of the victim's vehicle, stated that he was approached by the victim's that he agree and black house. stated that he agree and black house. stated that the sus 's vehicle and began to speak with twelicle away from the curb and drove sto drive southbound when he heard a vehicle that the victim turned to him and told he a burgundy colored smaller SUV. MB for the stated that he was a property of the stated that the sus that the victim turned to him and told he aburgundy colored smaller SUV. MB for the stated that he was approached by the victim's stated that he agree and black house.	ctim in the area of d and he drove he spect, a black male the victim, while south bound when olley of approximation that she was significant.	of 35 th St. and Proper to a residence of the with a stocky be pointing a pistol of the heard several nately 15 gunshot thot.	spect Av. and the near 36 th St. and 0 uild, appeared at at her. stated gunshots. stated s, then heard glas at he then observ	e victim asked him to Olive St, at a yellow the front window of that he pulled the tated that he continued as shatter. Stated ted pull up near him in	

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Further computer checks of **WILLIAMS** showed that he had been taken into custody in Henry County Missouri on 01/12/2021 at approximately 1617 hours. **WILLIAMS** was located occupying a red 2017 Mitsubishi Outlander (VIN: JA4AP3AU6HZ004302; KS Temporary License: 127NST). **WILLIAMS** was removed from the vehicle in regard to a call for service Henry County Sheriff's Office / Missouri State Highway Patrol. The vehicle owner provided Consent to Search for that vehicle and law enforcement located multiple spent 9mm casings, 21 live 9mm rounds, and a Taurus Millennium G2 PT111 G2 (Serial: TKT67199) chambered in 9mm and including a magazine containing five live rounds with another live round loaded in the chamber. The pistol was located underneath the front passenger's seat.

Based on information provided by the Henry County Sheriff's Office, KCPD detectives contacted WILLIAMS' girlfriend stated that she had dated WILLIAMS' prior to his arrest in December of 2020. stated that when WILLIAMS' was released on 01/08/2021, he was released to her residence under the terms of his probation / parole. WILLIAMS stated that she was with WILLIAMS on 01/12/2021, and she observed WILLIAMS speaking with a female at 3646 Olive St. stated that WILLIAMS told the female to leave. stated that she and WILLIAMS left in her vehicle, a red Mitsubishi Outlander stated that when they returned a short while later, she observed a red sedan pull up to 3646 Olive St. exited the Mitsubishi Outlander while WILLIAMS approaches the red sedan. observed WILLIAMS pull a handgun, and point it at the front passenger area where the victim is sitting stated she observed that vehicle begin to pull away and WILLIAMS began firing the gun at it. stated that she observed the rear right window to be broken out as it was driving away. stated that WILLIAMS then pointed the gun at her and ordered into the vehicle. stated that she believed that if she did not get into the vehicle, WILLIAMS would have killed her. states that

person who fired the gun that killed the victim.

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WILLIAMS drove the Mitsubishi Outlander to 1603 W 12 St. (Millennium Gas Station) and ordered her to get out and buy a phone charger. stated that if she did not get the charger in one minute or less, he would enter the gas station and kill her and everyone else. stated that she tried to reason with WILLIAMS, who eventually left her in the vehicle but kept the keys on his person, and went to retrieve the charger himself. stated that she was terrified to leave the vehicle and remained inside. stated that WILLIAMS got back into the vehicle and drove to her grandmother's residence in Kansas City KS stated that WILLIAMS pulled up in front of the residence, rolls down the front passenger window, extended his firearm across and fired multiple times at the residence (KCKPD CRN: 21-4321). stated that WILLIAMS then drove back into Missouri, while calling an unknown party. stated that WILLIAMS drove them to an unknown location off 35 St. and met up with B/M 11/21/1985 and another party. overheard WILLIAMS and talking about how, "the car is hot," and they agreed on a plan to drive to Henry County MO to get a new one. stated that WILLIAMS drove the car, containing her and towards Clinton MO, but approximately twenty minutes prior to WILLIAMS' arrest, he switched with and allowed to drive. WILLIAMS was occupying the front passenger seat of the vehicle at the time of arrest. provided her phone number to detectives (913-271-2774) and stated it was active and on during the homicide / kidnapping
/ aggravated assault. stated that WILLIAMS utilized her phone, but did not have one of his own.
r aggravated assault.
An eyewitness contacted police and provided a formal statement to detectives, stating the following: lives at 3646 Olive St and has been living there for a few weeks. states that TRAVON WILLIAMS came over to the residence, already upset about owing another party money. states that WILLIAMS went outside and fired a gun into the air, which was advised by other parties, is the way that WILLIAMS , "processes his anxiety." WILLIAMS returns inside the residence, holding a gun. stated that she told WILLIAMS she could get the money he needed, and WILLIAMS left the residence for approximately 15 minutes.
WILLIAMS returned, still upset. stated that WILLIAMS was inside the residence when Linda Gantt (the
deceased victim) came downstairs and wanted to speak to stated that WILLIAMS walked over to Linda Gantt, shoved the gun to her head and neck, and told Gantt that she has to leave and never come back. stated that Gantt walked across the street and WILLIAMS left again for a brief period of time.
WILLIAMS returned, parking his vehicle on the street, before going inside the residence and telling everybody
inside to go and get into WILLIAMS' vehicle. stated that she observed drive up to the residence with
Gantt in the passenger seat and WILLIAMS went to that vehicle to have a conversation that could not hear.
heard the engine of seed 's vehicle rev, then pull off. street, taking a shooting stance and subsequently firing shots into stated that WILLIAMS stated that WILLIAMS
then got into his vehicle and take off after several hours and
noted that WILLIAMS did not return during that time.
stated that when she attempted to intervene in WILLIAMS' violence, he told her, "I don't wanna do you too."

Investigators responded to 1603 W 12 St. and retrieved video surveillance. **WILLIAMS** is visible on video exiting the red Mitsubishi Outlander, carrying keys with him, and entering the convenience store.

A party contacted by Henry County Sheriff's Office that stated he was with **WILLIAMS** at 0800 hours on 01/12/2021 stated that **WILLIAMS** exited the Mitsubishi SUV at some point and a black handgun fell out onto the driver's side floorboard.

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Detectives responded to Henry County MO Sheriff's Office and the Taurus 9mm (TKT67199) was released to the custody of the Kansas City Missouri Police Department. That firearm was immediately transported to the KCPD Crime Laboratory for testing and comparison. A KCPD Firearms Examiner confirmed that the spent shell casings recovered on scene at 3646 Olive St were fired from the gun recovered from WILLIAMS' vehicle.

Detectives responded to Henry County MO Sheriff's Office and attempted an interview with WILLIAMS. Detectives also obtained a Henry County search warrant for WILLIAMS' DNA Standard. WILLIAMS became belligerent, eventually barricading himself inside an interrogation room and refusing to provide a court-ordered DNA Standard / Buccal Swabs. WILLIAMS was restrained and the DNA Standard was retrieved, then transported to the KCPD Crime Laboratory for comparison.

WILLIAMS is a convicted felon, with convictions including: Involuntary Manslaughter in the First Degree (confinement of 6 years in 2019) and Armed Criminal Action (confinement of 3 years in 2019). WILLIAMS represents a clear danger to the community through multiple arrests for violent offenses, his willingness to disregard the prohibitions placed on him following his convictions, and threats issued to potential witnesses. Because WILLIAMS also fled Kansas City immediately following the homicide, he represents a flight risk as well.

Printed Name	/s/ Det. Sean Patrick Mar	tin, #5733	Signature	of San	\$5433
The Court finds	probable cause and direct	s the issuance	of a warrant this	day of	
		Judg	ge		
	Circuit Court of		Country	State of Missour	: