IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT

POLICE NO.	: KC21006972
PROSECUTOR NO.	: 095462856
OCN	:
STATE OF MISSOURI,)
· · · · · · · · · · · · · · · · · · ·	AINTIFF,)
vs.)
)
WILLIE T WREN)
6311 Woodland Ave., Apt. 704) CASE NO. 2116-CR
Kansas City, MO 64132) DIVISION
DOB: 06/27/1983)
Race/Sex: B/M)
)
DEFE	NDANT.)
COM	DI AINT

COMPLAINT WARRANT REQUESTED

Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201310.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon
information and belief, charges that the defendant, in violation of Section 565.050, RSMo,
committed the class A felony assault in the first degree, punishable upon conviction under
Sections 558.011, RSMo, in that on or about on or about January 31, 2021, in the County of
Jackson, State of Missouri, the defendant attempted to cause serious physical injury to
by shooting at, and in the course thereof
was a special victim as defined by Section 565.002.

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 (571.015-001Y20205213.0)

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 571.015.1, RSMo, in that on or about January 31, 2021, in the County of Jackson, State of

Missouri, the defendant committed the felony of assault in the first degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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 571.015.1, 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. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201310.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about January 31, 2021, in the County of Jackson, State of Missouri, the defendant attempted to cause serious physical injury to by shooting at an an in the course thereof was a special victim as defined by Section 565.002.

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.

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 January 31, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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 571.015.1, 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 V. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class E felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 31, 2021, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a black Ruger 9mm, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count VII. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a concealable firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about January 31, 2021, in the County of Jackson, State of Missouri, the defendant knowingly possessed a black Ruger 9 mm, a firearm, and on [date], the defendant was convicted of the felony of possession of a controlled substance in the Circuit Court of Jackson County, Missouri.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney

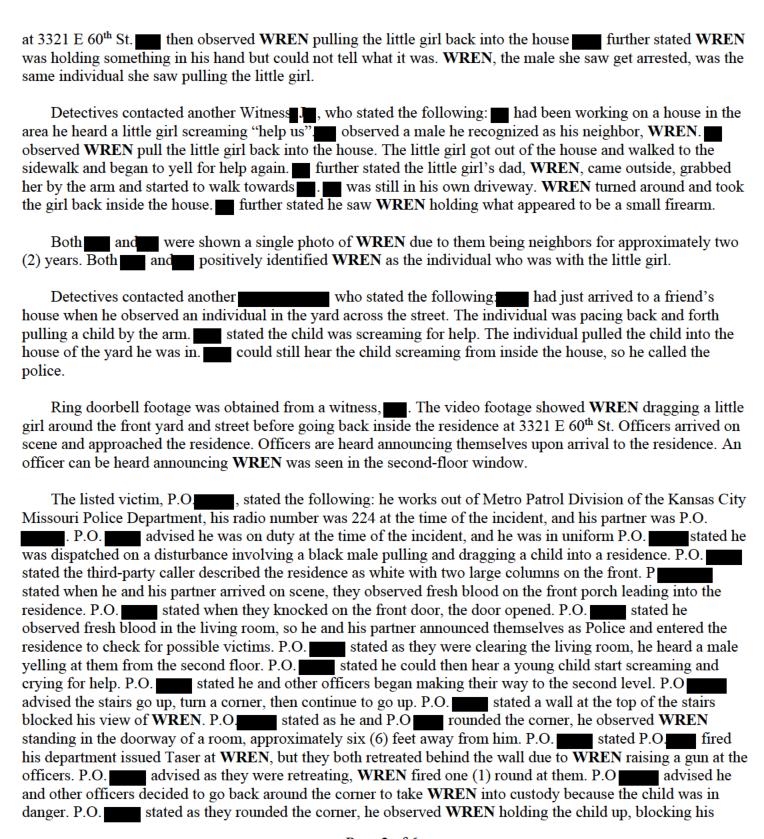
415 E. 12th St. Floor 7M Kansas City, MO 64106 (816) 881-3597 KNBryant@jacksongov.org

WITNESSES:

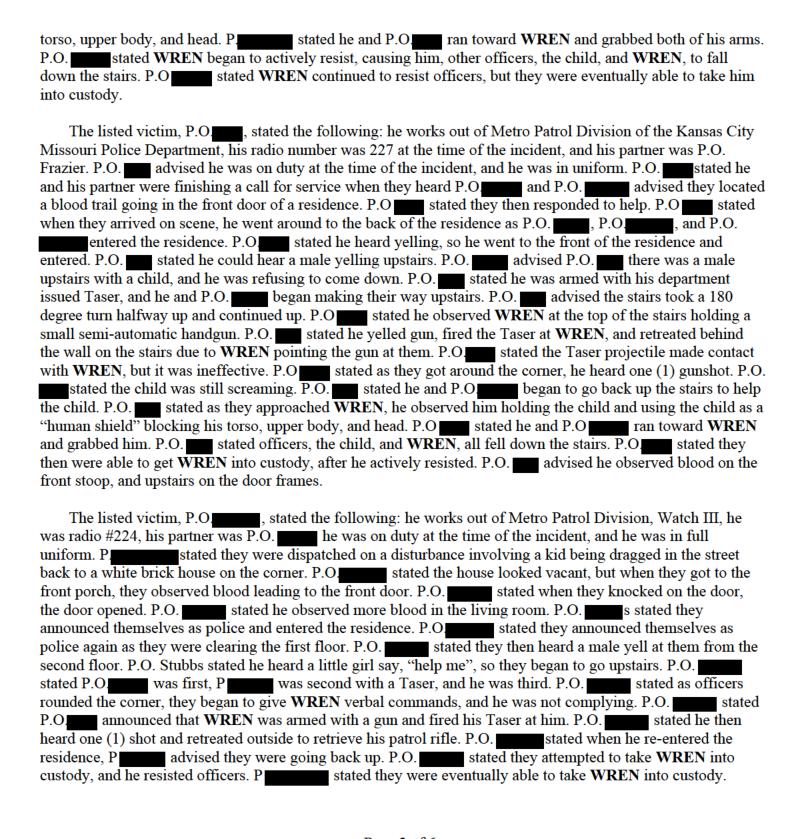
- 1. PO De'Andre L. Allen, 1125 Locust, Kansas City, MO 64106
- 2. DET Jacob W. Dee,
- 3. PO John Doe Frazier, 1125 Locust, Kansas City, MO 64106
- 4. PO Judith M. Harris, 1125 Locust, Kansas City, MO 64106
- 5. DET Kelsie K. McLees, 1125 Locust, Kansas City, MO 64106
- 6. DET Kimberly L. Monk, 1125 Locust, Kansas City, MO 64106
- 7. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
- 8. PO Jonathan S. Strabo, 1125 Locust, Kansas City, MO 64106
- 9. PO Eric D. Stubbs, 1125 Locust, Kansas City, MO 64106
- 10. Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

Date: 02/01/2021	EE CHOOL SIMI	CRN: 21-6972	
I, Det. Derek Sanders #5742, of the Ka (Name and identify law enforcement officer			
knowing that false statements on this for	m are punishable b	y law, state that the facts contained herein ar	re true.
I have probable cause to believe that on	01/31/2021 (Date)	, at 3321 E 60 th St (Address)	in
Kansas City, <u>Jackson County</u> (County)	Missouri Willie	Wren (Name of Offender(s))	
B/M 06/27/1983 (Description of Identity	у)	committed one or more criminal offens	se(s).
was a black male dragging a child back and advised the white brick house with large br (3321 E 60 th St, Kansas City, Jackson Co back into the house and the caller could still apparent blood on the front porch leading to the front door opened. Officers observed m residence to check for possible victims. After help. Officers then attempted to contact the	of the Kansas City unty, Missouri reg d forth in the street, rick columns on the ounty, Missouri). It hear the child yel to the front door. Of the apparent blood ter announcing there is suspect, Willie W. P.O.	Missouri Police Department were dispatche arding a disturbance. Officers were advised and the child was crying for help. Officers were corner of Indiana and E 60 th St was involve The call was updated that the male took the cling. Upon arrival, officers observed a trail officers attempted to knock on the front door, inside the residence. Officers then entered the mselves as police, officers heard a little girl y TREN B/M 06/27/1983, upstairs, and the sus P.O. and P.O. WREN	there were ed child of and he yell for
All five (5) officers then struggled with During the struggle, P.O. was pushed	h WREN , as he res	sisted arrest. WREN was then taken into cus resulting in an injury to his elbow and tailbour mmediate medical attention via ambulance.	•
•	ble illegal narcotic	o Research Medical Center by ambulance fo use. While at the hospital, WREN spontaneous shoot his neighbor.	
The juvenile victim,, was transpo	orted to Children's	Mercy Hospital for a medical evaluation.	
		the following: heard a noise coming from the grized the girl as the daughter of WREN where the grize the grize the grizest the grizest the daughter of where the grizest the grizest three three transfers to the grizest three transfers three transfers to the grizest three transfers thr	

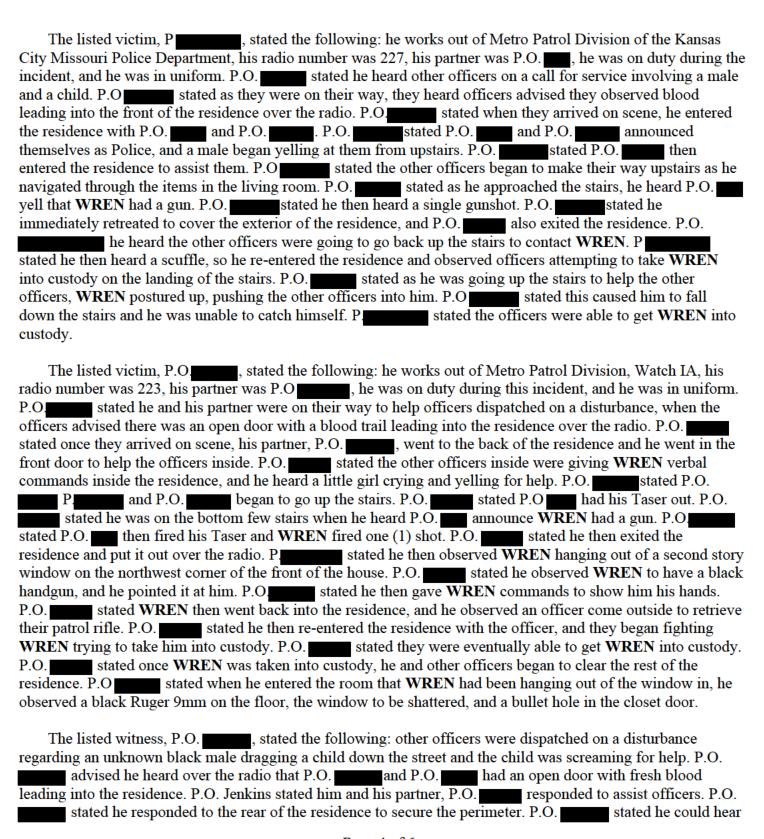
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CIXIN	41	-0714

an unidentified male (WREN) screaming inside the residence and officers giving verbal commands. P.O.
stated WREN was screaming over the officers' verbal commands. P.O.
Taser being discharged, followed by several loud thuds. P.O stated approximately two (2) seconds later,
he heard a single gunshot come from inside the residence. P.O. stated he then heard officers announce
"shots fired" over the radio, so he ran to the front of the residence and observed P.O.
residence and bracing himself against the wall as if he were injured. P.O. stated he then observed an
officer in the front yard pointing a flashlight at the northwest window of the residence, and he observed a black
male poking his head out of the window. P.O. stated once P.O. advised him, he was okay, he
responded to the back of the residence once more to secure it.

On 02/01/2021 at 0122 hours, Judge Weir, of the Jackson County Circuit Court, signed a search warrant for a DNA buccal swab from S.W. On 02/01/2021, detectives responded to Children's Mercy Hospital (2401 Gillham Rd, Kansas City, Jackson County, Missouri) to execute the search warrant.

On 02/01/2021 at 0118 hours, Judge Weir, of the Jackson County Circuit Court, signed a search warrant for 3321 E 60th St, Kansas City, Jackson County, Missouri. On 02/01/2021 detectives responded to 3321 E 60th St, Kansas City, Jackson County, Missouri to serve the search warrant and process the crime scene with Crime Scene Technicians. Detectives located two spent shell casings with the head stamp of Blazer 9mm, a Remington 9mm RSI handgun with a live round in the chamber and readily capable of deadly force, an unloaded Ruger .22 rifle, a loaded magazine for the rifle, live rounds, a pipe, and a gun box. Several apparent bullet holes were in the residence including in the staircase area officers were in when **WREN** shot at them. All items were recovered as evidence by Crime Scene Technicians.

Detectives reviewed the air tapes of the responding officers. During the incident officers were heard announcing themselves as police officers two times prior to entering the residence. Officers were heard talking back and forth with **WREN** to get him to come down the stairs. **WREN** is heard yelling at them he was not going to come down the stairs numerous times.

On 2/1/2021, **WREN** was transported the Police Headquarters to speak with detectives. **WREN** was advised of his Miranda Warning. **WREN** stated he understood and agreed to speak to the detectives. **WREN** stated the following: He got off work on 1/31/2021 around midnight and went over to his mothers to pick up his daughter. **WREN** takes his daughter home; they ate dinner and went to bed. In the morning, **WREN** made up some cereal for his daughter. At about 2000hrs, **WREN** and his daughter go over to his mother's because she needed some tomato paste for the dinner she was making. After he left his mother's, **WREN** and his daughter returned home. **WREN** stated "Lil' J" stopped by the house around 2125hrs. For about twenty minutes, **WREN** and "Lil' J" sat on the porch smoking a blunt until "Lil' J" left. **WREN** went back into the house and took his daughter upstairs to go to bed. **WREN**'s daughter told him she heard someone downstairs. **WREN** heard voices downstairs at which time he grabbed his gun from the dresser, put the magazine into it and loaded a live round into the chamber. **WREN** did not see who was in his house, but shot a warning shot into the ground towards the stairs. As soon as he heard the radios, he knew it was the police and threw his gun onto the ground and slid it towards the officers. **WREN** then put his hands up, got onto the ground and was taken into custody by the police officers. **WREN** further stated he was tased but did not know when it occurred.

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WREN denied knowing it was the police in his house until after he shot at them. He further denied being out in the street with his daughter as he dragged her by her arm. He further denied breaking the second-floor window and pointing a gun at an officer outside.

WREN is a convicted a felon for possession of an illegal substance x3.

Due to the aforementioned information, it is believed that **WREN** presents a danger to all the victims and the community.

Printed Name Det. Derek Sanders #5742	Signature /s/Det. Derek Sanders #5742
The Court finds probable cause and directs the issuance of a warrant this day of	
	Judge
Circuit Court of	County, State of Missouri.