

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

POLICE NO. :	KC19062489
PROSECUTOR NO. :	095461722
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DOUGLAS V. GRIFFIN)	
5513 Wabash Ave)	CASE NO. 2116-CR
Kansas City, MO 64130)	DIVISION
DOB: 11/17/1993)	
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 August 19, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, knowingly or with the purpose of causing serious physical injury to Elliott Herring caused the death of Elliott Herring 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

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571.015.1, RSMo, in that on or about August 19, 2019, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, 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 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.

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/ Jeannette Wolpink
Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-1776
jwolpink@jacksongov.org

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WITNESSES:

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106
3. Elliott Herring, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
5. DET James H. Price, 1125 Locust, Kansas City, MO 64106
6. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
7. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
8. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 11/04/2020

CRN: 19-62489

I, Detective Ilinca Rusnac #5741, of the 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 08/19/2019, at US 71 Hwy and Red Bridge Rd in
(Date) (Address)

Kansas City, Jackson Missouri Douglas Griffin
(County) (Name of Offender(s))

R:B S:M DOB: 11/17/1993 [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08/19/2019, at 0031 hours, Officers of the Kansas City, Missouri Police Department were dispatched to E Red Bridge Rd. and US 71 Hwy. on a reported Dead Body. Upon arrival the victim was located on the ground, next to a silver Mitsubishi Galant (Missouri license DM2Z4K), deceased from an apparent gunshot wound. KCPD Crime Scene Technicians responded and processed the vehicle, recovered numerous DNA swabs and latent print cards.

The Jackson County Medical Examiner's Office determined the Victim dies as a result of a gunshot to the back of the head. The Victim also suffered multiple contusions and abrasions to his head and legs. The death was ruled a homicide.

Detectives conducted a computer check of the Mitsubishi Galant and determined it was sold to Douglas Griffin (b/m, 11/17/1993) on 08/14/2019.

On 08/19/2019 Detectives made contact with Griffin, who stated his vehicle had been stolen and he was at his residence on 08/18/2019 sleeping from 1530 until approximately 0900 on 08/19/2019. He provided his cellular phone and phone number, 816-745-2929, to detectives and gave consent to have a search completed on his phone. A search of text messages on Griffin's phone revealed messages indicating he was not sleeping during said time frame and he was attempting to meet an unknown person at a McDonalds in the area of US 71 Hwy and E Red Bridge Rd. Messages also indicated that he was with a person by the name of "[REDACTED]"

An interview with the victim's roommate revealed that the victim left their residence on 08/18/2019 at approximately 1930 hours. The roommate stated the victim was driving his 2004 Chrysler Sebring (Missouri license KD7V7B) when he left the residence.

On 08/19/2019 officers were dispatched to 2300 E 55th St on a reported abandoned auto. Upon arrival Officers determined the vehicle was the victim's Sebring. The location of where the victim's vehicle was abandoned is only two blocks away from Griffin's residence. The Sebring was towed to the Vehicle Processing Facility at which time it was processed and numerous DNA swabs and latent print cards were recovered.

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While Detectives were searching the information retrieved from Griffin's phone it was determined there were numerous contacts between Griffin and the number 816-469-1784 listed as [REDACTED] in his contacts. Griffin also called [REDACTED] when he was alone in the interview room prior to detectives entering the room. Griffin can be heard telling the male voice on the other line that he was going to leave the line open and told him "to put in on mute." Griffin's phone extraction shows several calls to [REDACTED] during the time he was inside the interview room alone as well as text messages from [REDACTED] during that same time telling Griffin to "relax" and "u keep hanging up."

Lab reports were received months later. The swab of the driver's seat back and headrest was matched through CODIS to [REDACTED]. A computer search of [REDACTED] revealed him to be associated with Griffin in prior police reports.

Court orders were obtained for both Griffin and [REDACTED] phone numbers and a CAST analysis was subsequently performed. The CAST analysis shows both mobile devices to have been in the area of the homicide around the time of the homicide.

On 10/20/2020 Griffin provided a statement. Griffin stated that he was with [REDACTED] the night of the homicide. [REDACTED] was driving Griffin's vehicle when it broke down on the US71 SB off ramp onto Red Bridge Rd while they were on their way to rob a drug dealer. After several unsuccessful attempts at getting a ride back home, [REDACTED] flagged down a vehicle that was passing them by. A light skin black male single occupant pulled over and got out of his car to help Griffin and [REDACTED]. Griffin stated that he could hear [REDACTED] asking the Victim for a ride but the Victim refused, offering his help to try to get the car started instead. As Griffin was by the rear of his vehicle looking for the jumper cables, he saw [REDACTED] retrieve a Glock pistol from the front of either his waistband or pocket and shoot the Victim, who then fell to the ground. Butler then told Griffin to get into the Victim's vehicle, which he did. [REDACTED] then drove to 2300 E 55th St and told Griffin that was the location of where he was going to abandon the Victim's vehicle. [REDACTED] then dropped Griffin at his home, abandoned the vehicle and walked back to Griffin's home, where he remained for the rest of the night and into the following morning.

Printed Name Detective Ilinca Rusnac #5741 Signature /s/ Detective Rusnac #5741

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

Judge

Circuit Court of _____ County, State of Missouri.