

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

POLICE NO. :	KC22032697
PROSECUTOR NO. :	095469730
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JERPREE WILLIAMS)	
3328 Kensington Ave.)	CASE NO. 2216-CR
Kansas City, MO 64128)	DIVISION
DOB: 05/31/2002)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 May 17, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Andreone Hall caused the death of Andreone T Hall 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 Andreone Hall as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, 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 (571.015-001Y20205213.0)

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 May 17, 2022, 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 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. 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.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)

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 B felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about May 17, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons, namely Andreone Hall.

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.

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Count IV. 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 May 17, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing unlawful use of a weapon by, with and through, the knowing use, assistance and aid of a 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. 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.

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.

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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/ Kelly Collins
Kelly Collins (#68006)
Assistant Prosecuting Attorney
415 East 12th Street
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Kansas City, MO 64106
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kmcollins@jacksongov.org

WITNESSES:

1. PO Erik B. Enderlin, 1125 Locust, Kansas City, MO 64106
2. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 05/18/2022

CRN: KC22032697

I, Detective Hobart Price #5254
(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 05/17/2022, at 3319 Linwood Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Jerpree C. Williams
(County) (Name of Offender(s))

B/M 05/31/2002 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 05/19/2022 at approximately 1910 hours Officers of the Kansas City Missouri Police Department were in the area of Linwood and Indiana, Kansas City, Jackson County, Missouri when they heard numerous gunshots. Officers responded to the address of 3319 Linwood Blvd, Kansas City, Jackson County Missouri which is a gas station / convenient store. Officers located a deceased male in the parking lot of the store suffering from apparent gunshot wounds. Officers took multiple parties into custody including **Jerpree Williams (JW) (5/31/02)** who is a black male wearing a light blue t-shirt, black shorts and a black hat. Surveillance video was obtained at the location. The surveillance video depicts a gold colored Kia four door with VIN: 5XXG14J25NG098757 parking at the gas pumps. **JW** gets out of the driver door of the Kia and a male wearing a white tank top is also seen getting out of the passenger side of the Kia. **JW** and the male with the tank top are both seen going into the store. The victim arrives in a white Cadillac SUV, gets out of the vehicle and walks towards the convenience store. While in the store **JW** and the male with the tank top are at the checkout counter and looking out the window in the direction of the victim. The victim can be seen approaching the door to the store, but walking past the door at which time **JW** can be seen pulling out a black and silver gun. As the victim is standing at a walk-up window near the door to the convenience store **JW** exits the store, goes towards the victim, and points a gun at the victim. The victim begins running away from **JW** back in the direction from which the victim came. A spent .40 caliber shell casing is found near the door where the victim and **JW** are seen coming into close proximity to each other and where **JW** stands as he shoots at the victim. **JW** and the male wearing the white tank top are seen running towards the Kia, appear to retrieve additional firearms, and then begin shooting in the direction of the victim. Numerous spent shell casings are recovered from the area **JW** and the male wearing the tank top appear to be shooting from. As the victim runs back to the white Cadillac SUV he arrived in, a male gets out of that same white Cadillac SUV the victim arrived in and begins shooting in the direction of **JW** and the male wearing the white tank top. The male wearing the white tank top is seen fleeing the scene west bound. **JW** is apprehended at the scene. No firearms are found on his person, but an empty gun holster is on his person.

PROBABLE CAUSE STATEMENT FORM

CRN KC22032697

The victim was later identified as Andreone T. Hall B/M 10/05/2002. The preliminary anatomic diagnoses from the Jackson County Medical Examiner’s Office listed the victim as having multiple gunshot wounds including a perforating gunshot wound of the left mid back and a penetrating gunshot wound of the right forearm. The Jackson County Medical Examiner listed the cause of death as multiple gun shots and the manner of death as homicide. A search of the victim at the scene of the shooting and the Jackson County Medical Examiner’s office showed he was unarmed.

A search warrant was obtained for the gold four door Kia which was being driven by JW. Upon executing the search warrant a silver and black Smith and Wesson .40 caliber handgun was located in the front passenger seat. A black rifle was located in the rear floorboard.

JW was transported to Police Headquarters for a formal recorded statement. **JW** was read the Miranda warning and initially stated he was at the gas station at the time of the shooting and heard gunshots. **JW** initially denied any involvement in the shooting. Upon further questioning **JW** stated he shot the victim in self-defense. **JW** was further questioned and admitted to knowing the victim. **JW** stated the victim has shot at him in the past because the victim believed **JW** or his associates had broken into the victim’s house. **JW** admitted to being inside the store and seeing the victim. **JW** pulled a gun out of his pocket and exited the store. **JW** stated the victim was running away with his back towards **JW** when **JW** aimed his gun and shot at the victim. **JW** stated the victim was fidgeting but acknowledged he could not see anything in the victim’s hands. **JW** admitted after shooting his handgun he went to his car and retrieved his rifle and fired additional shots in the direction of the victim with his rifle.

Printed Name Hobart Price #5254 Signature /S/ Hobart Price #5254

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

Judge

Circuit Court of _____ County, State of Missouri.