

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

<b>POLICE NO. :</b>	KC21060036
<b>PROSECUTOR NO. :</b>	095470424
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>CLEON D. WHITE</b>	)	
<b>3705 Paseo</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64130</b>	)	<b>DIVISION</b>
<b>DOB: 06/11/1987</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**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 on or about September 8, 2021, in the County of Jackson, State of Missouri, the defendant either acting along or purposefully in concert with another, with the purpose of causing serious physical injury to MorteZ Falkner, caused the death of MorteZ Falkner by shooting him and defendant is further given notice that should the State submit murder in the second degree -- felony under Section 565.021(2), it will be based on the death of MorteZ Falkner as a result of the perpetration of the class B felony of unlawful use of a weapon under Section 570.030, 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 on or about September 8, 2021, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully 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 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 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 September 8, 2021, at East 19th Street and Vine Street, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm from 2006 black Cadillac.

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 on or about September 8, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of weapon charged in Count three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of 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.

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/ Jeremy J. Baldwin  
Jeremy J. Baldwin (#62734)  
Assistant Prosecuting Attorney  
321 West Lexington Avenue  
Independence, MO 64050  
(816) 881-4592  
jbaldwin@jacksongov.org

State vs. Cleon D. White

WITNESSES:

1. [REDACTED]
2. PO Kyle D. Conkling, 1125 Locust, Kansas City, MO 64106
3. DET Jonathan E. Cook, 1125 Locust, Kansas City, MO 64106
4. Morteز Falkner, 8101 Flora, Kansas City, MO 64134
5. [REDACTED]  
MO 64106
6. CST LaSandra Frowner, 2645 Brooklyn Ave, Kansas City, MO 64131
7. DET Joshua M. Gantt, 1125 Locust, Kansas City, MO 64106
8. PO Halil H. Hajdarevic, 1125 Locust St., Kansas City, MO 64106
9. [REDACTED]  
64106
10. DET Craig Horalek, 1300 Summit St, Kansas City, MO 64105
11. [REDACTED]  
[REDACTED]  
[REDACTED]  
64106
14. DET Mary J Kincheloe, 1125 Locust, Kansas City, MO 64106
15. CIV Logan Konopasek, 1125 Locust, Kansas City, MO 64106
16. PO Nicole Laethem, 1125 Locust, Kansas City, MO 64106
17. CST Ann M. Mallot, 2645 Brooklyn, Kansas City, MO 64127
18. PO Ljubomir Maracic, 1125 Locust, Kansas City, MO 64106
19. [REDACTED]  
[REDACTED]  
64106
21. CST Lori Nelson (Collado), 1125 Locust, Kansas City, MO 64106
22. CST Pamela Owens, 1125 Locust, Kansas City, MO 64106
23. Christina Perry, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
24. [REDACTED]  
[REDACTED]  
[REDACTED]  
64106
26. PO Blake A. Ross, 1125 Locust, Kansas City, MO 64106
27. CST Kelli Sharp, 2645 Brooklyn, Kansas City, MO 64127
28. CST Benjamin Simmons, 2645 Brooklyn Ave., Kansas City, MO 64127
29. [REDACTED]  
64106
30. DET Ethan R Skinner, 1125 Locust, Kansas City, MO 64106
31. [REDACTED]  
64106
32. CST Greg VanRyn, 6633 Troost, Kansas City, MO 64131

**PROBABLE CAUSE STATEMENT FORM**

Date: 09-23-2022

CRN: KC21-060036

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 09-08-2021, at E. 19<sup>th</sup> Street and Vine Street in  
(Date) (Address)

Kansas City, Jackson Missouri Cleon White B/M 06-11-1987  
(County) (Name of Offender(s))

6'03", 250lbs, blk hair, bro eyes, [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 09-08-2021, at 0010 hours, Officers of the Kansas City Missouri Police Department responded to a shooting victim who was transported by private party to Truman Medical Center where he died as a result of his injuries. Officers were advised the shooting had previously occurred at E. 19th Street and Vine Street, Kansas City, Jackson County, Missouri. Additional Officers responded to the area and located a crime scene. The victim was identified as MorteZ Falkner B/M 09-07-1989. The Jackson County Medical Examiner determined the victim was shot in the back and ruled the death a homicide.

Several parties were spoken to at Truman Medical Center. Collectively, they advised the victim was celebrating his birthday with a group of friends when he was struck by gunfire by a person in a dark colored vehicle. There were several people who fired in return at the suspect vehicle who fled the crime scene.

On 09-08-2021, upon review of the Genetec cameras, located at E. 19th Street and Vine Street, the shooting incident was captured on surveillance video which revealed the following. The victim exited the Velvet Freeze located at 1827 Vine Street, Kansas City, Jackson County Missouri. As the victim approached the south sidewalk of 19<sup>th</sup> Street and Vine Street, the suspect vehicle, identified as a 2006 black Cadillac STS MO license plate of NH9-Z9V, approached the intersection from the east. At the stop sign, the driver side window of the suspect vehicle was rolled down and a firearm being held by an occupant of the vehicle was presented and fired at the victim. The suspect vehicle then fled the scene westbound on E. 19th Street as additional shots continued to be fired from the driver side window.

Multiple spent shell casings were collected from the scene to include 40 caliber casings which were located on the northeast side of E. 19th Street where the suspect began shooting from as well as the west side of Vine Street; the direction the suspect fled while continuing to shoot.

The owner of the suspect vehicle reported the vehicle stolen on 09-08-2021. The owner reported they arrived at their residence on 09-07-2021 around 1900 hours. The only other person at the residence was a relative. When

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the owner left in another vehicle, at approximately 2200 hours to travel north, the vehicle was parked in the driveway. When they returned the next day, on 09-08-2021, between 1100-1200 hours, the vehicle was missing from the driveway.

Upon further review of ALPR (license plate readers) and Genetec cameras prior to the homicide, the suspect vehicle was determined to be at the following locations on 09-07-2021: 31st and Cleveland at 2003 hours (near the owners residence), at 75th and Prospect at 2037 hours which is in close proximity to a tavern the victim was known to frequent and was previously at prior to the homicide, at 1200 Emanuel Cleaver Blvd at 2128 hours and at West 47th and Madison Avenue at 2130 hours. This was significant because the victim was celebrating his birthday with family at a restaurant 2 blocks from W. 47<sup>th</sup> and Madison Avenue. The investigation revealed the victim had posted photographs of this celebration on social media at this restaurant. Within minutes of the post, the suspect vehicle was captured on surveillance video traveling in the area where the social media posts indicated he had been celebrating. It was also determined the victim posted to social media, videos of himself and friends celebrating at the tavern located at 1827 Vine Street prior to the homicide.

On 09-15-2022, at 1500 hours, the suspect/reported stolen vehicle, 2006 black Cadillac STS, was recovered by Officers of KCMO Police Department near E. 28<sup>th</sup> Street and Walrond Avenue; one half mile from where the victim reported it stolen. Surveillance video was recovered from the area which revealed the suspect vehicle was abandoned on 09-08-2021 between 1242 hours and 1522 hours.

The genetic profile of Cleon White B/M 06-11-1987 was developed from the spent shell casings located at the homicide scene on the northeast corner of E. 19th Street and Vine Street with a statistical data of 10 quintillion. The genetic profile of Cleon White B/M 06-11-1987 was also developed from the spent shell casings located on the west side of E. 19th Street and Vine Street with a statistical data of 2 sextillion. These spent shell casings were recovered from the area the suspect vehicle, 2006 black Cadillac STS, was shooting at the victim.

The 2006 black Cadillac STS was processed for trace evidence. The genetic profile of Cleon White B/M 06-11-1987 was developed from the steering wheel of the 2006 black Cadillac STS with a statistical data of 1 octillion and the gear shift of the 2006 black Cadillac STS with a statistical data of 1 quintillion.

During an interview of the owner of the vehicle, [REDACTED] they were presented with a photograph of Cleon White and asked if they recognized this person. [REDACTED] said they did not want to answer that question. When asked if the person in the photograph had permission to drive the vehicle, [REDACTED] said, "No." When asked if the person had ever been in [REDACTED] vehicle, [REDACTED], said, "No."

An interview conducted of [REDACTED], revealed they only knew the victim to have issue with a person with whom they referred to as "Cle." [REDACTED] said there was a physical altercation between "Cle" and the victim several years ago, but she did not know of anything recent.

**PROBABLE CAUSE STATEMENT FORM**

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Printed Name Detective Mary Kincheloe #5063 Signature /s/ Detective 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.