

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

Police# 14-038301
Prosecutor# 095419127
1416-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Freddie D. Price
11016 Herrick Ave.
Kansas City, MO 64134
DOB: 08/23/1981; Race/Sex: B/M;
SS#**

Defendant.

Count I. Murder 1st Degree (10021030)

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 June 4, 2014, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Shaunda Thomas by shooting her.

Count II. Armed criminal action (31010990)

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 June 4, 2014, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First 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 First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

THE STATE OF MISSOURI

vs.

Freddie D. Price

Count III. Violation of order of protection for adult - 1st offense (29175160)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 455.010, 455.045, 455.050, and 455.085, RSMo, committed the Class A Misdemeanor of Violation of Order of Protection, punishable upon conviction under Sections 558.011 in that on or about June 3, 2014, the defendant, having knowledge of an order of the Circuit Court of Jackson County that prohibited the defendant from initiating communication with Shaunda Thomas, knowingly violated the terms and conditions of the order by initiating communication with Shaunda Thomas by calling her on the telephone and meeting in person with her.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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,

Trisha Lacey (#55710)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, Missouri 64106
TLacey@jacksongov.org

WITNESSES:

DET Alane M. Booth , 1125 Locust, Kansas City, MO 64106
River Spring, MD 20904
City, MO 64106

DET Robert D. Guffey , 1125 Locust, Kansas City, MO 64106

DET Rodney E. Haney , 1125 Locust, Kansas City, MO 64106

DET Alex E Lepper , 1125 Locust, Kansas City, MO 64106
City, MO 64128

DET Mark A Slater , 1125 Locust, Kansas City, MO 64106

Shaunda L. Thomas , Prosecuting Attv. Office, Kansas City, MO 64106
City, MO 64134

PROBABLE CAUSE STATEMENT FORM

Date: 7/7/2014

CRN: 14-038301

I, Det. Alane Booth #4105

(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 6/4/2014, at 7035 Crab Apple Lane in
(Date) (Address)

Kansas City, Jackson Missouri Freddie D. Price, b/m,
(County) (Name of Offender(s))

b/m, 8/23/81, 5'11, 160lbs, s.s.# committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 6/4/14 at approximately 0810 hours, members of the Kansas City Missouri Police Department were dispatched to the Maple Hills Apartment Complex, 7035 Crabapple Lane, Kansas City, Jackson County, MO in regard to investigate the need for an ambulance. Upon arrival, a deceased b/f was observed on the outdoor playground associated with the complex near the dispatched Crabapple Lane address. The deceased female was observed to have apparent gunshot wounds. Numerous .380 auto shell casings were observed near the victim's body. During the course of the investigation it was learned her vehicle, a 1995 Red GMC Yukon, MO plate UJ9W5G, VIN # 1GKEK13K0SJ750633 was unaccounted for along with her cellular phone. The female was identified as Shaunda Thomas, b/f, 9/11/1978, 5'4", 110lbs, of 4217 Chestnut Ave, Kansas City, Jackson County, MO. An X-ray of Thomas' body revealed five bullets within the victim's body, three of which were in Thomas' head.

Surveillance video associated with the Maple Hills Apartment Complex depicted Thomas' red GMC Yukon had entered the complex on 6/4/14 at 0303 hours and subsequently parked along the eastern most edge of the complex, near the wrought iron fence at the eastern perimeter of the complex, east of the playground, during heavy rain. At approximately 0459 hours, after the rain stopped, the surveillance video depicted Thomas flee from the driver's side of the red Yukon and showed she was pursued on foot by a slender b/m with short hair who had exited the front passenger door of the red GMC Yukon. Thomas ran through the complex, as her movement was tracked by surveillance cameras. The video showed the b/m caught up to her and grabbed her from behind. The b/m is taller than Thomas and wrapped his arm around her neck then turned her around. The b/m can be seen associated with a light in his right hand. The two of them then walked to the playground. After a brief time, the b/m then walked east from the playground by himself, and paused at the eastern most wrought iron fence line at the east edge of the complex near the victim's red Yukon. The b/m then walked to the Yukon, and entered the driver's side door and drove north out of the complex.

On 6/4/14, after viewing the surveillance video of the complex where the homicide occurred, a Kansas City Missouri Police Department Canine Officer and his canine responded to the grassy area associated with the property east of the wrought iron fence where the b/m had paused. A Ruger .380 automatic handgun with a laser sight was located, but the firearm was missing the magazine. All the shell casings from the homicide scene have

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been confirmed by the Firearms Section of the Regional Crime Laboratory as having been fired from the .380 auto firearm recovered from the area near the homicide scene.

A resident at Thomas home stated that on the morning of 6/4/14 at approximately 0700 hours he answered an incoming call on the residential phone from a male, whose voice he recognized as "Jack," who he knows to be Freddie Price. The resident advised detectives that "Jack" asked, "Is your mom home yet?" then Price started laughing. The resident immediately hung up the phone and did not engage in a conversation. Thomas' residential phone records indicated several in-coming phone calls between 0700-0730 hours from Thomas' cell phone, after Thomas' death.

On 6/5/14 at 1706, a member of the Kansas City Missouri Police Department was dispatched in regard to an abandoned auto located at 6408 E 93 St., Kansas City, Jackson County, Missouri. The vehicle was noted to be Thomas' red GMC Yukon. The surrounding area where the vehicle was located was noted to be primarily uninhabited. A search of the vehicle revealed the vehicle was void of any property or paperwork, and had apparent wipe marks on the exterior of the vehicle.

On 5/20/14 Thomas filed a Domestic Violence report with the KCMO Police Department which listed Freddie Price, b/m, 8/23/81, as having struck Thomas in the leg with a spiked bat and having flattened tires on Thomas' GMC Yukon with a spiked bat. The district officer completed a Lethality Assessment Report (LAP) at that time. The LAP report documented that Price had threatened Thomas with a weapon, threatened to kill her and her children, and that Price is violent and jealous, in possession of a firearm, and Price has followed her in the past. An Order of Protection was signed on 5/23/14 by a Judge with a hearing date set for 6/4/14 at 0830 hours, the same day Thomas was found deceased. In the Petition for Ex-Parte Emergency Order of Protection, Thomas, the Petitioner, wrote that on 5/20/14-5/22/14, the Respondent, Freddie Price, had fired gunshots outside her home, threatened to fight her son, and threatened to kill her if she left him. Thomas also included in the Petition that Price's monikers are "Jack" or "Kojack." The Order of Protection had not been served. It should be noted that Shot Spotter information confirmed a call for service related to shots fired on 5/22/14, associated with 4217 Chestnut Ave, the victim's residence.

Thomas was documented as having left her job by herself on 6/3/14 at approximately 2237 hours in her red Yukon wearing the same clothing as when she was found murdered. Thomas' residential phone records indicated a call was made from Thomas' cell phone to the residence at approximately 2259 hours on 6/3/14. Thomas had reportedly called her residence to advise that she would be home late. A resident of 4217 Chestnut also communicated that "Jack" called the residence on the evening of 6/3/14 and asked for Thomas.

A witness stated she had contact with Thomas at 5401 Blue Parkway, a convenience store on 6/3/14 at approximately 2322 hours, and overheard Thomas' conversation on her cell phone having said, "I'm coming. I'm coming. I'm on my way!" The witness stated the conversation did not sound pleasant. The witness, who was familiar with Thomas, asked Thomas if she was speaking with "Jack," and Thomas confirmed that to be true. The witness stated Thomas was alone and the witness also observed Thomas' red GMC Yukon. The witness also stated that Thomas had previously stated she desired an amicable break up with "Jack."

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During the homicide investigation, three .380 shell casings were recovered from Thomas' porch and the street near Thomas' residence, which were associated with the Shot Spotter call at Thomas' residence on 5/22/14, which is also the date referenced by Thomas in the Petition of the Ex-Parte.

A witness described having seen Price approximately 30 days ago in possession of a small black automatic handgun. The witness also stated he was in the company of Thomas and Price on the afternoon of 6/3/14, before Thomas had responded to work. The witness described that he drove Thomas in Thomas' Yukon to meet and pick up Price after Price had called Thomas for a ride.

On 6/16/14 Price was arrested on an unrelated warrant. Detectives read Price the Miranda Wavier form out loud, and Price stated he understood his rights and agreed to speak with detectives. Price denied any involvement in Thomas' death. Price described himself as 5'11," 163lbs. Price stated people around him and close to him are accusing him of Thomas' death. Price stated people he's close to have turned their back on him since Thomas' death. Price stated he has been staying intermittently at area hotels to include the Relax Inn and the Crown Lodge, both located on Blue Parkway. Price stated he and Thomas broke up, and he moved out of her residence on Chestnut Ave several weeks prior to Thomas' death. Price confirmed the incident when he flattened Thomas' vehicle's tires with a spiked bat, and that he was present when shots were fired outside at Thomas's residence, but he stated he did not know where the shots came from.

Price stated Thomas had advised him of the Order of Protection against him, but Price stated he continued to meet with Thomas but not at her residence. Price stated he met up with Thomas on 6/4/14 after midnight, and stated he had called her and advised him of his location in the area of Meyer Blvd and College Blvd. Price stated he drove to the area of Meyer Blvd and College Blvd. Price then parked his vehicle on the shoulder of the road, and entered Thomas' red Yukon. Price had advised Thomas where to meet him.

Price then rode with Thomas as she drove into Swope Park off of the Gregory Blvd entrance. Price stated he had sexual intercourse with Thomas in the park, but outside the vehicle. Price stated he did not use a condom, and he ejaculated inside her. Price stated they performed oral sex on each other, but that they were only in the park for approximately 15 minutes. Price then drove the two of them in the Yukon back to the area of Meyer Blvd. and College Blvd. where Price had left his vehicle. Price exited the Yukon, and he believed Thomas was going home at that time in her Yukon. Price stated he then drove himself in his vehicle, to a residence in the area of the 110th and Herrick, Kansas City, Jackson County, Missouri. Price stated he had contact with an individual inside the residence, retrieved a change of clothes, then slept in his (Price's) vehicle in the driveway of the individual's residence. Price stated when he awoke later that same day after having slept in the drive way, he observed on social media sights that Thomas was dead. Thomas also stated that he learned via social media that he was accused of having caused her death.

The individual identified by Price at the residence where Price slept in the driveway was contacted by investigators. The individual stated Price and Price's father had shown up together at the relative's home on 6/8/14, and Price relayed information that Price was being accused of "doing something." The relative stated he had not seen Price for approximately two months prior to 6/8/14.

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During the course of the investigation, the original purchaser of the Ruger .380, the murder weapon, was identified. Further interviews led to the identity of a witness who was interviewed on 7/2/14, who identified a single photo of Price, and Price's moniker as "Jack." The witness advised investigators he had sold a black Ruger .380 (murder weapon) with "a beam on it" (laser) to Price on or around the time frame of approximately one week after 5/10/14, a date used as the witness's point of reference. The witness additionally stated on approximately 6/11/14, after the homicide, the witness requested the same Ruger .380 back from Price to sell to someone else. Price indicated he still had the firearm, but Price did not provide the weapon.

Printed Name Alane Booth

Signature

Det Alane Booth #4105

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

Judge

Circuit Court of _____ County, State of Missouri.