

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	23-052767
PROSECUTOR NO. :	095475878
OCN:	

FILED DIVISION 30 06-Sep-2023 12:21 CIRCUIT COURT OF JACKSON COUNTY, MO BY <u>Laurie D. Barnett</u> DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

CHARLES J WHITE
2725 North 64th Street
Kansas City, KS 66104

DOB: [REDACTED]

Race/Sex: H/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2316-CR
DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y20200903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, 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 on or about August 3, 2023, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, after deliberation, knowingly caused the death of Confidential Victim by shooting him, and that the defendant was eighteen years of age or older at the time of the offense.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

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 (571.015-001Y20205299.0)

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 August 3, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant, either acting alone or purposefully in concert with another, 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 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/ Traci A. Stansell

Traci A. Stansell (#41903)
Assistant Prosecuting Attorney

State vs. Charles J White, Case No.

321 W. Lexington
Independence, MO 64050
(816) 881-4591
truppstansell@jacksongov.org

WITNESSES:

The State's witnesses as of 9/6/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT

**FILED
DIVISION 30**

06-Sep-2023 12:17

CIRCUIT COURT OF JACKSON COUNTY, MO

BY Laurie D. Barnett DCA

Date: 09-06-23

Report #: 2023-52767

I, John Roach, a Detective with the Independence, Missouri Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 08-03-23 at 0206 hours, Charles Julius White, committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 08-03-23 at 0209 hours, Officers with the Independence Missouri Police Department were dispatched to 9803 E. US 40 Highway, Independence, Jackson County Missouri, the Sports Stadium Inn Motel, on a report of shots being fired in the area.

Upon Officer's arrival the Victim was located lying on his back, deceased, in the parking lot of the Motel. Two .223 caliber shell casings were located to the north and east of the Victim's body.

An autopsy would later show the Victim was shot one time in the back which exited through his chest causing his death.

Detective Roach arrived on scene and made contact with an individual who will be identified as Witness 1. Witness 1 identified the Victim stated she and the Victim had checked into room 310 at the Motel on 08-02-23 late in the evening. Witness 1 advised she got tired and went to bed. Witness 1 stated her last contact with the Victim was on 08-03-23 around 0030 when the Victim advised he would be outside. Witness 1 advised she knows the Victim uses and sells narcotics, but she did not have intimate knowledge of his activities.

Surveillance footage from the Sports Stadium Inn was retrieved and viewed by Detective Roach.

It should be noted that upon beginning the surveillance footage the time and date are displayed as "08-02-23, 23:00:00". This is not the correct time stamp for the footage.

At 08-02-23, 23:03 a male later identified as Defendant White, is observed walking from the east onto the Motel property. Defendant White is observed walking to room 309 and knocking on the door for several minutes.

At 08-02-23, 23:03 a black SUV follows Defendant White onto the Motel property. The SUV backs into a parking spot and after several minutes of knocking on room 309 Defendant White gets into the back passenger seat of the SUV.

At 08-02-23, 23:08 the black SUV with Defendant White in the rear passenger seat exits the Motel property and parks in front of the Sandbar Lounge, 9807 US 40 Highway, Independence

Missouri. A few minutes later the SUV is observed pulling forward with its lights off and parking in front of room 327.

At 08-03-2023, 02:07 the Victim walks to the front of the motel property and is holding his cell phone while looking around. The Victim is observed communicating with someone via his cell phone. He is then observed walking toward the SUV. As the Victim is walking past the SUV he suddenly turns and runs toward the entrance to the Motel.

A subject is observed getting out of the front passenger seat of the SUV and firing a rifle at the Victim. The Victim is observed falling to the ground, deceased. The subject then gets back into the SUV.

At 02:09 hours a subject is observed exiting the rear drivers side of the SUV and getting into a silver sedan parked in front of the Sandbar Lounge.

At 02:09 both vehicles are observed leaving the scene westbound on 40 Highway.

On 08-04-23 video surveillance was received from KC Liquors at 9811 US 40 Highway. It should be noted the time stamp on the surveillance footage is one hour behind. On 08-03-23 at 01:37 a silver sedan and black SUV are seen parking in front of the Sandbar Lounge. Subjects are observed interacting between the two vehicles. Both vehicles are then observed leaving the scene at 02:09 westbound on 40 highway.

On 08-03-23 a Metro wide Intel Bulletin was disseminated to Police Departments. On the bulletin a still photograph from the Sports Stadium Inn surveillance footage depicted Defendant White.

On 08-04-23 Detective Roach was contacted by Detective Schemper, with the Fairway Kansas Police Department, who identified Defendant White from the Intel Bulletin. Detective Schemper further advised Defendant White is currently on Probation through Wyandotte County and reports to PO Chris Slater.

Detective Roach contacted PO Slater who advised he had just recently been assigned supervision of Defendant White. PO Slater advised Defendant White was asked to fill out an Adult Offender Status Report and on that Report Defendant White listed his phone number as 913-701-4147. PO Slater also advised Charles has a Facebook page under the vanity name "Chuck Taylor".

On 08-04-23 Detective Waterworth, with the Independence Police Department, submitted a Search Warrant Application and Affidavit for historical data and subscriber information for Defendant White's Facebook page "Chuck Taylor".

Upon receipt of the content of Defendant White's Facebook account records show Defendant White conducted a Facebook search for the Victim's profile page as well as Witness 1's profile page hours before the homicide.

It was also found Defendant White began a message thread with the Victim minutes prior to the homicide. In that message thread Defendant White identifies himself as "Holly".

"Holly" will be referred to as Involved 2 during this investigation. Defendant White and Involved 2 have a romantic relationship with each other. The Victim is known to have purchased his

narcotics from Involved 2. According to cell site data from Involved 2's cellular device she was not at the Sports Stadium Inn at the time of the homicide.

During the Facebook conversation with the Victim, Defendant White tells the Victim he is in a silver Hyundai next to a "black truck". The Victim attempts several calls to Defendant White all of which are ignored. This message thread occurs on 08-03-23 between 0159 hours and 0205 hours.

On 08-04-23 Detective/Task Force Officer L. Freeman obtained a Pen Register Trap and Trace with call detail records and subscriber data for Defendant White's cell phone: 913-701-4147. Upon receiving that data from the service provider, it showed Defendant White's cellular device to be transmitting data in the area of the Sports Stadium Inn at the time of the homicide.

On 08-07-23 Detective Waterworth submitted a Search Warrant Application and Affidavit for a cell phone tower historical data "dump" for the area of the Sports Stadium Inn Motel. Upon execution of the Search Warrant data received from the cell phone tower showed Defendant White's cell phone to be in the area of the Sports Stadium Inn at the time of the homicide.

On 08-16-23 Detective Waterworth conducted an interview with a person who will be referred to as "Involved 3" during this investigation. Involved 3 stated she confronted Defendant White in regard to his recent activities and asked him "if it was the worst of the worst". Defendant White responded with, "have you heard about the guy that got smoked in the parking lot?" Involved 3 asked Defendant White if he had any involvement with that and he responded with "if you watch the news you don't need to be asking me these questions. You really don't want to go there."

Involved 3 also advised in the last couple of weeks she has observed Defendant White in possession of several assault style rifles as well as handguns.

On 08-18-23 Detective Waterworth tracked the cellular device utilizing the number 913-701-4147. Defendant White was located and observed holding a cell phone in his hand. It was discovered the movements of the mobile device with phone number 913-701-4147 were the same as that of Charles White. This confirmed that the mobile device with phone number 913-701-4147 was in the possession of Charles White.

Detective J. Roach

/s/ John Roach

Print Name

Signature