

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 September 18, 2023, 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 4 - Exhibiting (571.030-010Y20205299.0)

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 E felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 18, 2023, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a .22 caliber revolver, a weapon readily capable of lethal use, in an angry or threatening manner.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to

exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count IV. 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 September 18, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon - exhibiting charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon - exhibiting 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 V. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about September 18, 2023, in the County of Jackson, State of Missouri, the defendant knowingly possessed a .22 caliber revolver, a

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firearm, and on January 9, 2023, the defendant was convicted of the felony of unlawful possession of a firearm in the Circuit Court of Jackson County, Missouri.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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/ Paul M. Conklin III
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WITNESSES:

The State's witnesses as of 9/18/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

FILED
18-Sep-2023 21:59
CIRCUIT COURT OF
JACKSON COUNTY, MO

Date: 09/18/2023

CRN: 23063977

I, Detective [redacted], Homicide Unit, 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 09/18/2023, at [redacted] in
(Date) (Address)

Kansas City, Jackson Missouri Morrow, Eric L
(County) (Name of Offender(s))

BM 05/23/1980 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 09/18/2023 at 0906 hours, Patrol Officers with the Kansas City Missouri Police Department responded to [redacted], Kansas City, Jackson County, Missouri, in regard to a fatal shooting.

Due to information that the suspect may still be in the residence the officers set up a perimeter on the residence. The officers were able to order the residents to exit. A white female exited the residence and advised the victim and shooter, E or Eric, were still inside the residence. A black male holding a bat, exited the residence and dropped the bat when given orders to do so. The black male stated that the suspect had been armed with several guns but had been disarmed. At that time a black male then identified as the suspect, Eric L Morrow, exited and was taken into custody. After that two white females, and another black male exited the residence. Eric Morrow was identified as the suspect by several of the witnesses.

The officers then made entrance into the residence and located the victim laying on the stairs that went from the first floor to the second floor. Two other white males were located in the residence and removed.

The victim was pronounced deceased by personnel from the Kansas City, Missouri Fire Department, and his body was left at the scene.

Detectives responded to the scene and observed the victim laying supine on the inside stairs descending from the second floor of the residence. A single small defect was observed between his left eyebrow and left eye socket. There was apparent blood coming from his left eye socket and nose that had pooled under his head and on the stairs.

It was determined that several of the residents had been involved in the altercation in an attempt to stop Morrow from attacking the Victim. Two of the witnesses detained the Morrow after he shot the Victim until officers arrived.

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Witness#1 advised he has lived at [REDACTED] for approximately three (3) months, he stays in an upstairs bedroom. He lives there with several other people. He acknowledged that the Victim also lived at the residence. He also acknowledged that the Victim and Morrow who he knows as "E" were cousins.

Witness#1 further stated on 09/18/2023, he went to bed shortly after around 0200 hours. He was awakened to someone screaming for him as he overheard an argument coming from outside his bedroom. As he got up and put clothes on, he continued to hear arguing at which time he heard the Victim telling someone to "just leave". He then heard "E" was back at the residence causing a disturbance. Shortly after hearing the verbal argument, he heard a loud "slap" and glass breaking.

As he opened his bedroom door, he heard a gunshot followed by people asking for help. After opening his bedroom door, he observed Morrow pointing a gun towards his direction. He tried talking to Morrow telling him to just leave but Morrow kept refusing to comply. As Morrow continued pointing his gun at him and arguing with the Victim, he found an opportunity and attempted to take the gun away from Morrow.

While struggling to gain possession of the gun, he heard another gunshot and noticed the Victim fall to the ground. He then was able to grab the gun as he and Morrow began tussling over the gun. Having his hand on the barrel, he was able to move the barrel away from everyone as he told the other individuals upstairs to leave. As he and Morrow arrived near the stairs, he observed Witness#2 at the bottom of the stairs and asked if he could help remove the gun from Morrow. While Witness#2 attempted to remove the gun, from Morrow, he punched Morrow in the stomach a few times, in an attempt to pry the gun away. He stated the gun discharged in his direction but he was not struck.

He observed Other#1 peeking from his bedroom door, at which time he asked him to help. Other #1 found a "stick" from upstairs and began swinging it, striking Morrow in the arms. Shortly after being struck by the "stick", Morrow dropped the gun at which time he grabbed it. Morrow then reached for a backpack and dropping what appeared to be two (2) additional firearms from his bag. He quickly grabbed both guns and stated someone moved the firearms away from Morrow and into a bedroom. He heard verbal commands coming from downstairs (assuming to be coming from Police). He observed Morrow attempt to run and hide but quickly stopped when he realized he had no place to go. That is when Morrow was taken into custody by Police as he and the other witnesses told the officers what happened.

Witness#2 has lived [REDACTED] for six months. He lives there with several people including the other witnesses and the Victim.

On 09/17/2023, the suspect, known to him only as "Eric" came over to the house. He knew Morrow and the Victim were cousins. On 09/17/2023 at approximately 1700 hours, Morrow left the house and came back with only enough food for himself and proceeded to eat the food in front of the other residents of the house. This angered some of the residents, but especially angered the Victim. The Victim and Morrow began to have an argument, but eventually calmed down. At some point Morrow had left the residence.

On the morning of 09/18/2023, at approximately 0800 hours, he was in the basement of the residence where he has a room. He heard a knock at the front door, causing him to come upstairs. He did not see anyone on the first

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floor, and as he began to go toward the staircase leading up to the second floor, he heard a single gunshot followed by seeing the Victim slide backwards down the stairs. He saw Witness#1 at the top of the stairs wrestling with Morrow over a gun, and yelling for help. He ran upstairs and, as Morrow was on the ground, he took control of Morrow's left arm, who was holding onto a revolver style handgun. He was able to remove the gun from Morrow's hand. Other#1 then took the gun and tossed it into a bedroom. As Other#1, Witness#1, and he tried to hold Morrow down, Morrow continued to struggle, and was able to get to his backpack. Morrow began to pull another firearm from the bag, but was unable due to being restrained by the three of them. He stated Morrow was armed with three firearms in total, the one he wrestled away from him, one that Morrow tried to pull from his bag, and a third, which he could see inside of the same bag but Morrow did not retrieve.

He continued to hold Morrow down until the arrival of police.

He stated he believed that if he did not restrain Morrow, he would have shot the Victim again or possibly shot the witnesses inside the house.

Witness#3 stated that on 09/18/2023 at approximately 00845 to 0900 hours, she was in her room and heard a knock on the front door. She heard, Other#2, the daughter of Witness #1, opened the front door and allow the suspect, "E," into the residence. The victim, then stated "who let this nigga in here?" Other#2 told the Victim that she let "E" inside of the residence. The Victim then yelled at Morrow, "Just leave. Get the hell out of here!". Morrow slapped the Victim in the face and then reached into an orange in color bag. Morrow slowly removed a black in color pistol from the orange bag. The Victim then threw a plate of food at Morrow causing the plate to shatter. She along with the Victim, and Other #1 closed the door to her bedroom in an attempt to keep Morrow out. She then heard Morrow state "1,2,3,4 I'm going to shoot through the door." And what sounded like a gun shot. The victim opened the door because he believed Morrow would keep shooting. The Victim and Morrow began physically fighting. The Victim once again yelled at Morrow to, "Just get the hell out of here." The Victim and Morrow kept fighting one another and a second shot was heard. At this time, the Victim fell to the ground motionless. She observed Witness #1 and Witness #2 fighting and attempting to restrain Morrow. While Witness#1 and Witness#2 were fighting with Morrow a second black in color pistol fell out of the orange bag that he was carrying. She observed Witness#2 pick the pistol up and throw it into her bedroom. While this was occurring, the police arrived on scene and began calling everyone out of the residence. Morrow was transported to University Medical Center for injuries he had sustained during the altercation with the victim and witnesses. When a search incident to arrest was conducted a large amount of cash and some coins were located in the front pocket of his jeans. A white iPhone cell phone with a clear case on it was also taken from his person. During the search, the officer could smell an odor of what he knew to be PCP, based upon his training and experience, coming from Morrow.

The officer that had escorted Morrow in the ambulance to the Medical Center heard him make several spontaneous utterances. Morrow spontaneously uttered that "they" had tried to rob him. Morrow also told hospital staff that he had smoked PCP earlier in the day.

Morrow had the following US currency and coins in his pockets when he was searched incident to arrest: 22 1\$ bills, three \$5 bills, one \$10 bill, 19 \$20 bills, two quarters, one dime, one nickel and one penny. All items were recovered.

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During the witness interviews no one made any statements about Morrow claiming he was being assaulted or robbed by the victim.

After a search warrant was granted for the residence a search of the residence was conducted. The scene inside the residence appeared to be in a small hallway on the second floor at the top of the stairs, there was broken glass on the floor. A .22 caliber H&R (N26379) revolver was located on a shelf in the second-floor west bedroom in plain view. The revolver was cleared and five spent shell casing and four live rounds of ammunition were removed from the cylinder. A revolver style pellet gun was located with the .22 caliber revolver. A second pellet gun was located in the second-floor southern bedroom.

On 09/18/2023, Detectives responded to the Kansas City Police Department Metro Detention Center and contacted Morrow. He refused to exit his cell or provide a statement. A search warrant for his buccal swab had been obtained. Prior to leaving a detective served the buccal swab search warrant without incident.

The underlying offense is related to a serious felony currently being investigated by Kansas City Missouri Police Department which is punishable by significant penalties that incentivize the defendant to fail to appear.

Printed Name Detective [REDACTED] Signature /s/ Det. [REDACTED]

The Court finds probable cause and directs the issuance of a warrant this 18 day of September.

Kyndra J. Stockdale
Judge

Circuit Court of Jackson County, State of Missouri.