

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

2316-CR04792

POLICE NO. :	KC23079683
PROSECUTOR NO. :	095476823
OCN:	

**FILED
DIVISION 29**

22-Nov-2023 14:35

CIRCUIT COURT OF JACKSON COUNTY, MO

BY *Jane Doe* DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

WAYNE A. HUNT

524 Benton Blvd. #34

Kansas City, MO 64124

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2316-CR

DIVISION

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y20200911.)

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 November 21, 2023, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Confidential Victim, caused the death of Confidential Victim by shooting him.

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.

Count II. Armed Criminal Action (571.015-001Y20205299.)

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 November 21, 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. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y20201304.)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about November 21, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Confidential Victim by shooting Confidential Victim.

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.

Count IV. Armed Criminal Action (571.015-001Y20205299.)

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 November 21, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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/ Paul M. Conklin III
Paul M. Conklin III (#66958)
Assistant Prosecuting Attorney
415 E. 12th Street
11th Floor
Kansas City, MO 64106

State vs. Wayne A. Hunt, Case No.

(816) 881-3824
PTConklin@jacksongov.org

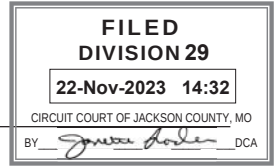
WITNESSES:

The State's witnesses as of 11/22/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM 2316-CR04792

Date: 11/22/2023

CRN: 23079683



I, Detective [REDACTED] [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 11/21/2023, at [REDACTED] in
(Date) (Address)

Kansas City, Jackson Missouri Hunt, Wayne
(County) (Name of Offender(s))

[REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 11/21/2023, at 2339 hours, Officers with the Kansas City Missouri Police Department were dispatched to the area of [REDACTED] on a reported shooting. Upon arrival to the area, Officers located Vicim#2, a female, in the driveway of [REDACTED] suffering from apparent gunshot wounds. EMS was ordered and responded to the scene. Victim#2 was transported to an area hospital with life threatening injuries. Prior to being transported, Victim#2 told officers that the shooting occurred at her residence and pointed to [REDACTED] Kansas City, Jackson County, Missouri. Victim#2 also said her boyfriend, "Wayne Hunt," was responsible for the shooting. She added that Wayne Hunt lived at [REDACTED].

Officers responded to the residence at [REDACTED] and observed the glass of the front door and a front window to be shattered. Upon entering the residence in search of additional victims, Officers located an unknown deceased male, later determined to be Victim#1, in the entryway, suffering from apparent gunshot wounds. The male victim was confirmed deceased by KCFD on scene.

Officers secured the crime scene, and Detectives responded to the scene. While at the scene, other Officers provided information from an area hospital that a black male with apparent gunshot wounds, had arrived at the Emergency Room, but was being uncooperative. The black male provided a name of "Wade Hunt". "Wade Hunt" had arrived with a black female who was also being uncooperative. Surveillance video was reviewed and "Wade Hunt" and the black female were observed arriving in a black and orange Nissan Kicks, with a Missouri license of [REDACTED]. Wade Hunt was driving and the black female was the front passenger.

Detectives responded to the hospital, and confirmed that "Wade Hunt" was Wayne Hunt [REDACTED]. A check of the license plate responded to a black female with the last name of Hunt, who was later identified as [REDACTED]. A check of Wayne Hunt responded with him being a convicted felon. Wayne Hunt was detained at the hospital.

The vehicle was located in the hospital parking lot and towed to the City Tow Lot for processing.

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Kansas City Missouri Police Department Crime Scene Technicians responded to the scene and processed the residence. Victim#1 was located inside the entryway at the front of the residence and observed to have blood on his pants. He had multiple defects to his chest and abdomen. A black pistol was located on the floor by Victim#1's left hand. Multiple apparent bullet strikes were observed in the front door and appear to come from the exterior of the residence. Multiple shell casings were located outside the front door and inside the residence. Detectives conducted an area canvass and contacted several residents that had a direct view of the residence at [REDACTED]. One resident had doorbell camera footage that showed part of the interaction. It showed a small SUV that matches the size and shape of the Nissan Kicks drive by the residence south to north at 2325 hours. At 2333 hours the same vehicle returns and a male matching Hunt's description exits the driver's seat and the bedroom window does not appear to be damaged. At 2334 hours the same male gets back into the driver's seat and drives south and the bedroom window is damaged.

Another resident explained that she had known Victim#1 and his deceased mother and knew that Victim#1 had inherited the residence when his mother passed away.

A detective conducted a search for the Nissan Kicks using a license plate reader system and the Genetec surveillance system and determined that the Nissan was observed at the following locations at the following times on 11/21/2023: East 31st Street and Cleaver II at 2301 hours, East 55th Street and Prospect Avenue at 2319 hours.

Detectives contacted Victim#2 at the hospital where she had received treatment for multiple gunshot wounds to her abdomen. She provided a statement in which she explained that she had been in a five-year relationship with Victim#1. Ten months ago, she started to date Wayne Hunt and moved from Victim#1's residence to Wayne Hunt's residence. On the afternoon of 11/21/2023 she met Victim#1 at his residence and spent the afternoon and evening with him. At an unknown time during the evening she and Victim#1 were in the front bedroom of the residence, laying on the bed. Without any warning the front window was shattered by an unknown object and she could see Hunt standing outside the window. Hunt stated "Bitch get your ass out here. ". She refused to go outside and believed that Hunt left for several minutes. She then heard movement outside and told Victim#1 that she believed Hunt had returned. Victim#1 picked up his pistol and approached the front door to check. As Victim#1 opened the door she saw Hunt standing outside and at the same time hears gunshots. She fell down and realized she had been shot. She crawled to the door and then was able to get to the neighbor's residence. At that time, she was able to get the neighbor to call for help. She clarified that she was standing behind Victim#1 and that she knew that Victim#1 had to be shot also because of how close they were standing together. She was then shown a single picture of the rear of the Nissan and she identified the vehicle as Hunt's daughter's vehicle, but added that Hunt frequently drives the vehicle.

On 11/22/2023, the Nissan Kicks was processed and it was observed that the driver's seat cover had been placed under the driver's seat and had apparent blood on the cover. A non-driver's license for Wayne Hunt was located. Registration paperwork for the vehicle listed to [REDACTED] was also located.

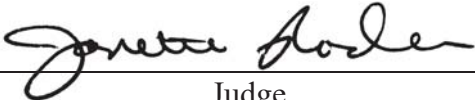
The underlying offense is related to a serious felony currently being investigated by Kansas City Missouri Police Department which is punishable by significant penalties that incentivize the defendant to fail to appear.

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

The Court finds probable cause and directs the issuance of a warrant this 22nd day of November, 2023.



Judge

Circuit Court of Jackson County, State of Missouri.