

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE

Filed  
February 5, 2017  
1:58 pm  
[Signature]

POLICE NO. :	17-0400
PROSECUTOR NO. :	095437639

STATE OF MISSOURI, )  
 )  
 PLAINTIFF, )  
 )  
 vs. )  
 )  
 DARRELL E. WHITE )  
 )  
 9905 E. 85th Street, )  
 Raytown, MO - 64138 )  
 )  
 DOB: 09/05/1963 )  
 )  
 Race/Sex: B/M; )  
 )  
 SSN: [REDACTED] )  
 )  
 DEFENDANT. )

CASE NO. 1716-CR  
DIVISION



COMPLAINT

**Count I. Assault 1st Degree Or Attempt (565.050-002Y19791399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class B Felony Assault in the First Degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 4, 2017, in the County of Jackson, State of Missouri, the defendant attempted to kill or cause serious physical injury to [REDACTED] by shooting at 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 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.

**Count II. Armed Criminal Action (571.015-001Y19755299.0)**

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 February 4, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First



State vs. Darrell E. White

Degree charged in Count I, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

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,

/s/ Ashleigh A. Ragner  
Ashleigh A. Ragner (#63694)  
Assistant Prosecuting Attorney  
415 E. 12th St. 11th Floor  
Kansas City, MO - 64106  
(816) 881-3555  
ARagner@jacksongov.org

**WITNESSES:**

PO Adam Koepke, 10000 E. 59th St., Raytown, MO - 64133

  
PO Joshua Wildman, 10000 E. 59th Street, Raytown, MO - 64133

## STATEMENT OF PROBABLE CAUSE

Date: 02-05-2017

Report # 17-0400

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I, Joshua Wildman, an Investigator with the Raytown, 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 02-04-2017 at 1807 hours at, 9905 E. 85<sup>th</sup> Street, Raytown, Jackson County, Missouri, Darrell White white/male, born 09/05/1963, SS# [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 02-04-17 at 1807 hours, Raytown, Missouri Police were called to 9905 E. 85<sup>th</sup> Street Raytown, Jackson County, Missouri. The victim, [REDACTED] called police saying he had been shot at in the house. Officers arrived and found [REDACTED] and his girlfriend, [REDACTED] outside. Officers ordered the other occupants of the house outside. [REDACTED] walked out of the front door. She was holding a wallet, a phone, and a black Ruger handgun unloaded with the magazine removed. She set the items down on the porch. Following her, Darrell White, came outside. He was later identified by [REDACTED] and [REDACTED] as the one who fired the gun. He was taken into custody. Officers went into the house and performed a safety sweep. While conducting the sweep, they found five children, ages 4-12 in the back den on the southeast corner of the house. They were escorted outside. Officers also noticed an apparent bullet hole in a wooden door that led from the living room into the garage. A projectile was also located on the garage floor.

Detective Wildman interviewed Laronda at Police Headquarters. She said she, [REDACTED] Darrell, and [REDACTED] were in the dining room. [REDACTED] and Darrell began to argue about the death of loved ones. She said she and [REDACTED] went to their bedroom to get away. Darrell began knocking on the door and yelling at [REDACTED]. She said [REDACTED] went out to the dining room area and Darrell had a gun. She said Simon and Darrell began arguing. She and Simon decided to leave and were near the front door, when Darrell pointed the gun towards Simon. She said Letizia was trying to push the gun up and away. She said one gun shot was fired by Darrell. Laronda said they went outside and waited for Police.

Detective Wildman interviewed [REDACTED] at Police Headquarters. He said he, [REDACTED] and Darrell were at the dining room table. He said Darrell was being rude to [REDACTED], so he asked him to stop. They began to argue. [REDACTED] said he and [REDACTED] went to their bedroom. Shortly after, he said Darrell pounded on the door. [REDACTED] went out of the room and found Darrell in the kitchen. He said Darrell was holding a black handgun down to his side. They were arguing. He said he and [REDACTED] started to leave. As [REDACTED] and he were near the front door, he said Darrell fired a gun shot in his direction. [REDACTED] said [REDACTED] intervened and tried to push the gun away so Darrell could not shoot anymore.

Detective Wildman interviewed [REDACTED] at Police Headquarters. She said she, Darrell, [REDACTED], and [REDACTED] were at the table. She said Darrell and [REDACTED] began to argue. Initially she said Darrell and [REDACTED] were yelling at each other and that [REDACTED] and [REDACTED] left. Detective Wildman asked about the gun. She claimed that when she knew the Police were coming, she went to the back bedroom and retrieved the only gun in the house to give to Police. She said she did not know if the gun was involved or not. [REDACTED] later recanted and said she did hear a gun shot, but did not know who fired it. She told Detective Wildman that she was sure she did not shoot, sure that Simon did not shoot, sure that [REDACTED] did not shoot, and sure that the kids did not shoot. Detective Wildman inferred through this statement that the shot came from Darrell, as he was the only other person in

the house. [REDACTED] said she did not see Darrell have a gun. She also did not know if it had been moved from the closet before she went and picked it up.

A search warrant was obtained for the above residence. There was a bullet hole located in the wooden door and screen door that led from the living room to the garage. The door way is near the front door, and is in view of the dining room area. On the garage floor was a spent bullet projectile. A casing or gun magazine was not found. The gun was recovered from the front porch. [REDACTED] told Detective Wildman later, that after the shot was fired he saw Darrell "pick something up" from the ground and take it to the back yard.

Detective Wildman interviewed Darrell. Darrell requested an attorney and did not provide a statement.

J. Wildman  
Detective (printed)

[Signature]  
Signature

**THE COURT FINDS PROBABLE CAUSE.**

February 8, 2017  
DATE

[Signature]  
JUDGE