

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

POLICE NO. :	17-043665
PROSECUTOR NO. :	095439956

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
WILLIE WARREN)	
3856 E. 60th Terrace,)	CASE NO. 1716-CR
Kansas City, MO - 64130)	DIVISION
DOB: 07/10/1987)	
Race/Sex: B/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 May 10, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Caheemi Littlejohn 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 (571.015-001Y19755213.0)

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 May 10, 2017, 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

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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 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 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/ Daniel Portnoy
Daniel Portnoy (#62186)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Floor
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WITNESSES:



DET Scott M. Emery , 1125 Locust, Kansas City, MO - 64106

DET Thomas M. Hammond , 1125 Locust, Kansas City, MO - 64106

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Caheemi Littlejohn , Prosecuting Atty. Office, Kansas City, MO - 64106

[REDACTED]

PO Jacob M. Moore , 1125 Locust, Kansas City, MO - 64106

DET Scott P. Mullen , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

DET Hobart D. Price , 1125 Locust, Kansas City, MO - 64106

DET Brent R. Taney , 1125 Locust, Kansas City, MO - 64106

DET Daniel G. Thomas , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06-16-2017

CRN: 17-043665

I, Det. Scott Mullen #5431
(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 05-10-2017, at 11th/Prospect in
(Date) (Address)

Kansas City, Jackson Missouri Willie Warren
(County) (Name of Offender(s))

B/M 07-10-1987, SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Homicide - Murder

The facts supporting this belief are as follows:

On 05-10-2017 at 1327 hours, an officer from the Kansas City Missouri Police Department was flagged down by a witness in regard to a shooting at 11th/Prospect, Kansas City, Jackson County, Missouri. The witness told the officer the victim was his nephew and he was shot by a black male who was occupying a small red four door sedan. The witness stated the vehicle left the scene westbound. The officer observed the victim lying in the street deceased from apparent gunshot wounds. Three spent WIN .40 caliber S&W shell casings were recovered at the crime scene.

Security video was obtained from a resident near the crime scene. The video showed a grey Ford Taurus stop on 11th St west of Prospect Ave and the victim exit the front passenger seat. The victim walked east back toward Prospect Ave out of camera sight. Less than a minute later a small red four door vehicle was observed traveling westbound on 11th St.

The owner (witness) of the grey Ford Taurus was located who stated just prior to the shooting, the victim approached her in the parking lot of her apartment building and asked her for a ride to the park at 11th/ Prospect. The witness stated as she sat on 11th St at Prospect Ave waiting to cross Prospect, she observed the suspect across the street at the park. She stated the suspect was staring at her car and as she crossed Prospect, the suspect walked from the park toward her car. The witness stated she dropped the victim off just west of Prospect and she continued west on 11th St. The witness stated she heard gunshots and looked in her rearview mirror and saw the suspect with his arm extended at the victim and then saw the victim fall to the ground. The witness stated the suspect got into a red Saturn and started coming westbound on 11th St toward her car. The witness stated she was scared, so she drove through the park to get away from the suspect and came back around the block. The witness stated the suspect continued westbound on 11th St. The witness stated she knew the suspect and had spent time with him the previous day (05-09-2017) and was in his vehicle at her apartment complex.

The witness stated on 05-09-2017 the suspect came to her apartment complex with her friend in his red Saturn. She stated after the suspect and her friend came to her apartment, they all went to the liquor store at 9th/Prospect. The witness stated all three of them went into the store and after buying items, they all left in the Saturn and went back to her apartment building. The witness stated after they were back at her apartment building, they hung out outside of the building. She stated while they were outside, the suspect got into a fight with her friend and even punched her. The witness stated the suspect then left in the red Saturn. The witness stated this was the first time she had ever seen the suspect and did not know his name.

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Security video was obtained from Express Mart at 9th/Prospect which showed the witness, her friend, and the suspect arrive at the store on 05-09-2017 in a red Saturn bearing Missouri license plates FP9R8U. The witness, her friend, and the suspect all exit the vehicle, go into the store, purchase items, and leave in the Saturn as previously described by the witness.

Security video was obtained from the apartment complex where the witness lives. The security video showed the red Saturn arrive at the witness' apartment and the witness' friend go inside the apartment building. The witness and her friend exit the apartment, enter the red Saturn, and leave the complex. A short time later the video shows the red Saturn return. A little over a half hour after the vehicle returns, the video shows an altercation between the suspect and the witness' friend in the parking lot as described previously by the witness. After the altercation, the suspect leaves the apartment complex in the red Saturn.

A computer check of the license plate FP9R8U responded back to Willie Warren. A computer check of Willie Warren with an age similar to the witness and her friend revealed Willie Warren B/M 07-10-1987.

The witness' friend was located who provided a statement in regard to the events on 05-09-2017. She stated "Willie" picked her up after she got done with school in his red Saturn. She stated they went to the witness' apartment where they picked up the witness and went to the store at 9th/Prospect. She stated everyone went in the store and after buying items, they all returned to the witness' apartment. She stated after they returned to the witness' apartment, she caught "Willie" going through her purse. She stated they started to argue which led to him hitting her in the face/head numerous times. She stated "Willie" left in his red Saturn after the fight. The witness' friend was shown a photo of Willie Warren B/M 07-10-1987 and she positively identified him as the "Willie" whom she had been talking about during the interview.

The witness was contacted again and shown a photo line-up with Warren in the line-up. The witness positively identified Warren as the suspect in the previously mentioned details of her statement.

Warren was arrested on 06-14-2017. After waiving his Miranda Rights, Warren confirmed the details of the incidents at the witness' apartment and the liquor store on 05-09-2017. Warren stated after the disturbance at the apartment he drove to his grandfather's apartment (Willow Creek Apartments, 210 W. 100th Ter#108) in his red Saturn. Warren stated when he arrived at his grandfather's apartment he went to sleep and stayed in bed most of the next day (05-10-2017) if not all day. Warren stated his red Saturn would have been at his grandfather's apartment on 05-10-2017 while he was asleep. Warren stated he always has his cell phone on him and it would have been with him at his grandfather's apartment while he was sleeping. Warren denied being in the area of the homicide on 05-10-2017 and stated he had nothing to do with the homicide and did not have access to a gun.

After speaking to Warren, detectives responded to his grandfather's apartment. Warren's grandfather stated he was not sure if Warren was at the residence on 05-10-2017. An Astra A100 .40 caliber handgun bearing serial number 2524E was located under a couch inside the residence and recovered as evidence. The gun was loaded with live WIN .40 caliber S&W rounds. The KCPD Crime Lab test fired the gun and compared the results to the spent shell casings recovered at the crime scene and it was determined the recovered gun was the same gun which fired the rounds at the crime scene.

A search of the KCPD License Plate Reader System was conducted and a red Saturn with MO license plates FP9R8U was captured at the intersection of Independence Ave and Prospect Ave on the day of the homicide (05-10-2017) at 13:28:23 hours, approximately 1 ½ minutes after the original reporting officer was flagged down at 11th/Prospect in regard to the homicide.

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Printed Name Det. Scott Mullen #5431 Signature /s/Det. Scott Mullen #5431

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

Judge

Circuit Court of _____ County, State of Missouri.