

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

POLICE NO. :	17-052508
PROSECUTOR NO. :	095440966

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
DEMETRIUS D. WOODS)	
7615 Elm Ave,)	CASE NO. 1716-CR
Kansas City, MO - 64133)	DIVISION
DOB: 01/05/2001)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
)	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 June 11, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Michael J. Holmes by shooting him.

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.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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 June 11, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, 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/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
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KNBryant@jacksongov.org

WITNESSES:

DET Bonita Y. Cannon , 1125 Locust, Kansas City, MO - 64106
DET Jason C. Findley , 1125 Locust, Kansas City, MO - 64106
PO Kegan J. Gemmell , 1125 Locust, Kansas City, MO - 64106

State vs. Demetrius D. Woods

Michael J. Holmes , 4209 Monroe Ave, Kansas City, MO - 64130

DET Heather D. Leslie , 1125 Locust, Kansas City, MO - 64106

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

DET Joe A. Nelson , 1125 Locust, Kansas City, MO - 64106


DET Nathan S. VanVickle , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08-21-2017

CRN: 17-052508

I, Detective Bonita Cannon, #4585
(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 06-11-2017, at 4209 Monroe in
(Date) (Address)

Kansas City, Jackson Missouri Demetrius Woods
(County) (Name of Offender(s))

B/M 01-05-2001; SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:
On 06-11-2017 at approximately 2319 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 4209 Monroe on a reported shooting.

Upon arrival to the address officers observed a male suffering from apparent gunshot wounds. The victim was asked who shot him, to which the victim responded multiple times, "Lil Meechie" shot him and was wearing a white hooded jacket. The victim also stated "Lil Meechie" fled the scene northbound on foot. The victim did not know "Lil Meechie's" real name.

The victim was transported to St' Luke's Medical Center, where he later died from his injuries. Crime scene personnel processed the scene recovering one silver colored shelling casing and one brass colored shell casing. Both shell casings were head stamped "WIN .40 S&W".

Witness #1 [REDACTED] stated the victim received several text messages from 816-645-7330. The sender identified himself as "Drocc Jrocc Meechie" and he was looking for the victim. The sender texted, "I'm on 41st and Monroe walking down the street come out puuss" She received a second text, "Right here in front of yo shit". The victim responded, "Ight". Witness #1 then noticed a subject wearing a white hoodie looking in the front window of the residence. She further stated the victim had told her **Woods** was trying to get the victim to sell him his firearm. The victim told him multiple times he did not want to sell him the firearm. After **Woods** looked in the window, the victim told her he didn't know **Woods** was coming over and he was going to see what he wanted.

Witness #1 stated the victim exited the residence and confronted the subject in the white hooded jacket. The victim and the subject argued. Witness #1 stated she retrieved her cell phone to contact the Police when she heard 4 to 5 gunshots. The victim fell into the residence. She observed him bleeding. Witness #1 stated she asked him who shot him. The victim told her "Lil Meechie shot me."

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The cell phone number 816-645-7330 provided by witness #1 was checked via social media (Facebook). Upon doing so the number responded back to "Drocc Jrocc". Looking through the photos uploaded by "Drocc Jrocc" a diploma issued from the State of Missouri, revealed the name **Demetrius Woods**. A Facebook post shortly after the shooting "Drocc Jrocc" posted inquiring about trading a Glock handgun.

Detectives were able to locate a photograph of **Woods** which closely resembled the photos uploaded under the username "Drocc Jrocc".

Detectives obtained a signed court order for 816-645-7330, to locate cell phone. Upon doing so the cell phone was located in close proximity to 7902 E. 92nd Terrace. While detectives were conducting surveillance, **Woods** and a second male exited the residence at approximately 1330 hours. Upon seeing the detectives both males ran from the address. Detectives observed **Woods** drop a baseball cap and a cell phone while running. Both **Woods** and the second male (witness #2) were taken into custody.

When **Woods** was taken into custody he was in possession of a Glock Model 23, .40 caliber semi-automatic handgun with an extended magazine. The weapon had one brass colored "WIN .40 caliber S&W" live round in the chamber. The magazine contained 21 brass colored "WIN .40 caliber S&W" live rounds and two silver colored "WIN .40 caliber S&W" live rounds. The live ammunition recovered from the Glock handgun, matched the head stamp of the shell casings recovered from the scene.

Witness #2 stated **Woods** was picked up from the area of 35th and Garfield on 06-12-2017 at approximately 0230 hours. Both he and **Woods** spent the night at 7902 E. 92nd Terrace. Witness #2 stated he observed **Woods** with the recovered Glock handgun and extended magazine at the residence and when they left the residence just prior to being taken into custody. Witness #2 stated **Woods** was alone when he was picked up and was wearing a white "Gap" t-shirt with blue lettering.

On 06-13-2017 **Woods** mother contacted detectives stating, her son informed her would not speak to detectives without an attorney.

On 08-21-2017 at 1602 hours the reporting detective received information a letter was intercepted from JJC that **Woods** intended to send to an inmate at the Jackson County Adult Detention Center. JJC [REDACTED] stated he read the letter and **Woods** talks about the murder.

Upon reading the letter, the letter read in part: "Member Mike nem that use to be with Fazon....nem cuzz try to lash me so yunno me I ant going for! It....we got into a lil scuffle and I poped em, and B4 he died he said lil meechie poped me, bro I was just trying to letbuy a clip that I took from a lil....and like 8 r 9 grams of coke he upped his heat on me I had my heat but I poped him with his heat, bro I was scared, and kept the heat, I wasn't tryna call the police the wasnt gone help shit....they B on bullshit man I fucked up they charge me w 1st Degree murder and they Dont even know the story den his bm act like she Dont even know me nomore...even tho cuzz ry to Rob me and I get self Defence but Im not talking to the boyz bro...man I fucked up 1 Time, wish I had another chance but I live you foo see you soon 3336 miss you Foo JRoc 1 DRoc PSg WBH."

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On 08-22-2017 at 0935 hours **Woods** was transported to Police Headquarters, 1125 Locust for questioning. **Woods** was informed of his Miranda Rights via the Miranda Waiver at 1000 hours. **Woods** stated he understood his rights and was willing to speak to detectives. **Woods** signed the Miranda Waiver at 1001 hours.

Woods admitted arriving at the victim's residence with three males in a red rental vehicle. **Woods** admitted to texting the victim and being at the victim's residence to give him a magazine, however the magazine did not fit into the victim's handgun. The victim gave **Woods** the magazine back. **Woods** stated he then showed the victim some crack cocaine, wanting \$200 for it, the victim told him it was worth more. **Woods** stated as they were talking, one of the three males he arrived with, exited the vehicle, approached the residence and stepped up onto the front porch where **Woods** and the victim were standing. **Woods** stated the victim told them both to leave his porch. **Woods** stated the victim still had the crack cocaine at which time **Woods** told him "you are going to have to kill me." **Woods** stated when the victim pulled out his gun, the male only known as "Cutthroat" tackled the victim. "Cutthroat" and the victim struggled as **Woods** stood there. "Cutthroat" stood up armed with the victim's gun. The victim stood up and with his hands in the air, telling **Woods** to "chill out".

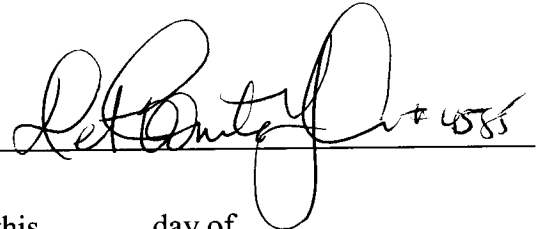
Woods stated "Cutthroat" shot the victim in the stomach, with the victim's firearm, then handed the victims firearm to **Woods**, telling him to shoot the victim. **Woods** stated he declined to shoot him, so "Cutthroat" took the handgun back and shot the victim two more times. **Woods** stated they ran and caught up to the other two males in the vehicle on 43rd Street.

Woods stated they discussed who should keep the victims firearm. **Woods** stated he told them he wanted it and they let him keep it. **Woods** stated he was arrested with the victim's firearm later the next day.

Woods admitted to writing the letter confiscated by JJC. He stated the letter was only part of the truth.

Printed Name Det. Bonita Cannon, #4585

Signature



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

Judge

Circuit Court of _____ County, State of Missouri.