

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

POLICE NO. :	18-000953
PROSECUTOR NO. :	095443208

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
AASIM I KARIM)	
5606 Paloma Ave,)	CASE NO. 1816-CR
Kansas City, MO - 64128)	DIVISION
DOB: 08/30/1965)	
Race/Sex: B/M;)	
SSN: XXX-XX-2065)	
)	DEFENDANT.

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about January 4, 2018, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Thomas J. Rice III by shooting him.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years 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 January 4, 2018, 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 committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

State vs. Aasim I Karim

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
415 E. 12th St. Floor 7M
Kansas City, MO - 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

[REDACTED]

DET Alane M. Booth , 1125 Locust, Kansas City, MO - 64106

PO Jeffrey M. Epstein , 1125 Locust, Kansas City, MO - 64106

DET Darin K. Penrod , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

Thomas J. Rice III, Prosecuting Atty. Office, Kansas City, MO - 64106

State vs. Aasim I Karim

PO Christopher S. Smith , 1125 Locust, Kansas City, MO - 64106

DET Brian Tomanio , 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 1/10/18

CRN: 18-953

I, Det. Alane Booth #4105
(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 1/4/2018, at 40 Highway and Manchester Ave in
(Date) (Address)

Kansas City, Jackson County Missouri Aasim Karim
(County) (Name of Offender(s))

b/m, 8/30/65, s.s. [REDACTED] aka Demetricus Clark committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 1/4/2018 at approximately 2152 hours, members of the Kansas City Missouri Police Department were dispatched to the intersection of US 40 Highway & Manchester Ave, Jackson County, Kansas City, Missouri, on a reported injury accident. Upon arrival officers discovered the victim deceased from an apparent gunshot wound and the victim's vehicle had also struck a utility pole, where it had come to rest. The victim was lying just outside the driver's door of his vehicle on the roadway. The victim was pronounced dead at the scene. A single .40 caliber spent shell casing was discovered in the roadway near the vehicle. The death is being investigated as a homicide. A subsequent body exam conducted by the Jackson County Medical Examiner's Office revealed the victim had a single gunshot wound to the head, left to right.

On 1/4/18 a witness was interviewed and was notified the death was a homicide as a result of a shooting. The witness, who was at the victim's residence on the evening of 1/4/18, advised the victim left the residence on 1/4/18 in his van sometime around 2130 hours, but wasn't sure. The witness advised detectives a b/m neighbor, who resides behind the victim's residence, had observed the b/m neighbor, whom she recognized as the resident there, firing a gun while standing in the rear yard of his residence as recently as a few days prior to the homicide, as well as several times within the last week. The witness pointed out the b/m's specific yard, which is within close proximity to the victim's residence. Detectives then noted the rear yard pointed out to them was marked as 5606 Paloma Av, Jackson County, Kansas City, Missouri, 64128. The witness also stated the b/m drives a dark colored vehicle, which she stated looks like a PT Cruiser. (It should be noted PT Cruisers are similar in appearance to Chevrolet HHR model vehicles.)

On 1/9/18, a black Chevrolet HHR four door with a hatchback, bearing MO license YH3U0V, was observed parked on the front south yard of the property. A Witness, who resides on the same street as the victim, was interviewed and stated on 1/3/18, a b/m who lives on Paloma Av behind the victim's house approached him while driving a black Chevrolet HHR and asked where the victim was today. The Witness stated the victim was working in Kansas, and the Witness asked why the black male was inquiring. The b/m then stated, "Tell Tommy, if him or his people keep messing with my dogs or my car, I'm gonna shoot them or shoot the house up." The b/m then drove away. The Witness heard gunfire outside near his residence at approximately 0130 hours on 1/4/18. The Witness spoke to the victim on the morning of 1/4/18 and advised him of the threat made by the b/m.

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The victim stated he had gone to the b/m's house overnight on 1/4/18 and yelled from the b/m's front yard to come outside. The victim reported he was advised by other occupants of the house where the b/m resided that the b/m wasn't home at that time. The Witness called the victim on the evening of 1/4/18 at 2138 hours to discuss work plans for the following day, and believed he was at home. The witness was shown a line-up of photos of six black males similar in appearance which included an image of the b/m documented to reside at 5606 Paloma Av, **Aasim Karim, b/m, 8/30/65**, also known as **Demetricus Clark, b/m, 8/30/65**, a convicted felon. The Witness picked Karim aka Clark out of the line-up as the b/m who made the threat against the victim and who he recognized resided behind the victim on Paloma Ave.

On 1/8/18, a detective viewed surveillance video collected from the relevant area for recorded activity on 1/4/18 of vehicles traveling along the route from the intersection nearest the victim's house at 30th Terr and Oakley Ave, to 31st St, to 40 Highway and Manchester Av, the location of the homicide. Video surveillance was obtained from a business located 40 Highway and Bellaire Av which depicted the victim's van traveling eastbound on 1/4/18 at approximately 2147 hours. Then following approximately 16 seconds behind the victim's van, a vehicle similar in appearance to a dark Chevrolet HHR, is observed traveling the same eastbound direction on 40 Highway with an apparent non-functioning left rear tail light.

An independent witness contacted the homicide unit on 1/5/18 and advised detectives he was traveling on 40 Highway near Manchester Av and witnessed the victim's van lose control and strike a pole on the shoulder of the roadway. The witness stated a dark in color Chevrolet HHR or PT Cruiser type vehicle was within immediate proximity and parallel to the victim's van when the van lost control, but the HHR continued to travel east on 40 Highway. As the HHR continued eastbound, the witness noticed the left rear tail light not functioning or illuminated.

On 1/9/18 a black Chevrolet HHR was observed parked on the property of 5606 Paloma Ave, at approximately 1127 hours. Surveillance was maintained on the vehicle and the residence of 5606 Paloma Av. The vehicle was then observed being driven from the property. The vehicle was not properly licensed, so a traffic stop was conducted on 1/9/18 at approximately 1250 hours. The driver identified himself as Aasim Karim, b/m, 8/30/65. Officers conducted a Terry Frisk and an object in his front pocket was believed to be a knife, so the officer removed it from the pocket, but realized it was a magazine with live .40 caliber ammunition. Upon this discovery, Karim spontaneously stated a guy he just dropped off at the BP gas station had the gun that went with the magazine located in his pocket and they were trying to sell it. The surveillance of the vehicle and the residence proved this utterance to be false. The vehicle was towed to the city tow lot, 7750 E. Front St., Jackson County, Kansas City, MO, 64120, pending a search warrant but no contraband was apparently visible in plain view prior to towing. The black 2011 Chevrolet HHR was documented to have MO plate YH3U0V '17, and VIN 3GNBABFW6BS651472.

Karim was transported to 1125 Locust St to be interviewed and was read the Miranda Waiver Rights and agreed to speak with investigators. Karim was asked clerical information initially, and confirmed he resides at 5606 Paloma Ave, Jackson County, Kansas City, MO. When questioning transitioned to the topic of people who are prohibited to handle firearms, he requested to speak to lawyer. The interview was terminated. Karim was held on a 24 hour Investigative HOLD for Felon In Possession (FIP)

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On 1/9/18 a Search Warrant was executed on 5606 Paloma Av. Numerous spent shell casings were located on the property, varying amounts of live ammunition was throughout the house, but a significant amount of live ammunition, handgun magazines, some which contained live ammunition, and a loaded shotgun, were found within a bedroom believed to be utilized by Karim. Some of the live and spent shell casings recovered from 5606 Paloma Ave were of the same caliber as the spent shell casing recovered from the homicide scene. No other firearm was located on the property. Several spent .40 caliber shell casings were recovered from near the back door of the residence and just inside the backdoor of the residence.

On 1/10/18 comparisons of recovered 40 S&W cartridge cases from 5605 Paloma Av was completed. It was determined the 40 S&W cartridge case from the homicide scene was fired in the same firearm as five of the 40 S&W cartridge cases recovered from 5606 Paloma Av on 1/9/18. One of the matching .40 caliber shell casings was from just inside the back door within the residence, and the other four matching .40 caliber shell casings were recovered from just outside the back door.

Printed Name Det. Alane Booth #4105 Signature /s/Detective Alane Booth #4105

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

Judge

Circuit Court of _____ County, State of Missouri.