

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

|                         |           |
|-------------------------|-----------|
| <b>POLICE NO. :</b>     | 18-026956 |
| <b>PROSECUTOR NO. :</b> | 095445114 |
| <b>OCN:</b>             | AN017461  |

**STATE OF MISSOURI,**

**PLAINTIFF,**

**VS.**

**WILLIAM H. YORK**  
**1230 S. Franklin Ave.**  
**Independence, MO 64053**  
**DOB: 05/28/1997**

**CASE NO. 1816-CR  
DIVISION**

**DEFENDANT.**

# COMPLAINT

**Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class A Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about April 19, 2018, at 1230 S. Franklin Ave., in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a motor vehicle, and as a result of the above described conduct, Abigail Edwards suffered injury or death.

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 (571.015-001Y19755299.0)**

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 April 19, 2018, in the County of Jackson, State of

**State vs. William H. York**

Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count I, all allegations of which are incorporated herein by reference,  
and the defendant committed the foregoing felony of unlawful use of a weapon 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/ Michael J. Hunt  
Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. Abigail L Edwards, 560 S. Oxford Ave., Independence, MO 64053
3. [REDACTED]
4. PO Kurt Jarnagin, 223 N. Memorial Drive, Independence, MO 64050
5. DET Kyle Jarnagin, 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 4/22/2018

Report #: 2018-26956

I, Christopher Burris, a Detective with the Independence, 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 4/19/2018, at approximately 0037 hours, William H.H. York, (Race- White, Sex- Male, DOB- 05/28/1997, Address-1230 S. Franklin Avenue, Independence, Missouri 64053, SSN- [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 04/19/2018 at approximately 0037 hours, Independence Police Officers were dispatched to 526 S. Oxford Avenue, Independence, Missouri 64052 in reference to a person who was reported to have been shot in the head.

Upon the arrival of officers, officers could hear screaming coming from 560 S. Oxford Avenue. Officers approached 560 S. Oxford Avenue, where they made contact with a male and female. Officers were directed into the residence and up to a second story bedroom, where they found a female laying on the floor. The female identified as Abigail Edwards, appeared to have been shot in the head and was obviously deceased. Officers secured the residence and surrounding scene, which included the roadway of Oxford Avenue. The residence of 526 S. Oxford was found to have no involvement in this incident. Several firearm shell casings were found on Oxford Avenue, just to the north of 560 S. Oxford Avenue. The shell casings were later identified to be 9mm.

Officers spoke with the two people initially contacted and determined that about five or six shots were heard. The two people were identified as [REDACTED] and [REDACTED]. It was reported that the resident, [REDACTED], got into a red SUV and fled the scene prior to the arrival of officers. The deceased female was believed to be [REDACTED] girlfriend. Patrol Officer Robert Romey found [REDACTED] red Chevrolet Tahoe at 570 S. Evanston Avenue, unoccupied.

Later in the day, Detectives Brian Draveling and Douglas Miller contacted [REDACTED] at 570 S. Evanston Avenue. [REDACTED] agreed to come to police headquarters to provide a formal statement. Upon being interviewed, [REDACTED] identified a subject as [REDACTED] who may have been responsible for the shooting. [REDACTED] subsequently identified William York as being "Scooby" from a photo lineup. [REDACTED] also provided information about two other individuals who may have been responsible for the shooting. [REDACTED] told Detective Draveling he had a feud with York about York stealing a vehicle from him. [REDACTED] advised that York's parent's residence was burned down after the theft and York believed he was responsible. [REDACTED] advised there had been shootings at his residence prior to this, but never reported the shootings to the police.

During the investigation, a citizen called to report that he located a pistol magazine with ammunition near the intersection of Lexington Avenue and Cedar Avenue. The magazine identified to be for a SCCY CPX-2 9mm pistol. The magazine was loaded with live ammunition.

Surveillance video was recovered from 576 S. Oxford Avenue. In the video a vehicle can be seen traveling north on S. Oxford Avenue right before the shooting. The video did not depict the shooting but had audio recording capabilities. Several gunshots were heard on the audio and the timing and rate of the gunshots were such that it was consistent with at least two weapons firing shots.

Detective James Fries and ATF Task Force Detective Ken Royster were familiar with the moniker "Scooby." Both Detective Fries and Royster were actively working an investigation into a series of street robberies involving York, who they knew from their investigation to go by the moniker "Scooby." Detectives Fries and Royster knew York to associate with Tristen Bishop and [REDACTED]. Bishop was arrested for being a felon in possession of a firearm on 04/07/2018. Bishop was questioned by Detective Royster in reference to that case.

Detective Fries and Detective Scott McKee conducted follow-up on [REDACTED] vehicle, which was believed to have been involved in the robberies they were investigating. The vehicle was identified as a burnt orange Pontiac G5. The vehicle was learned to have been repossessed on 04/18/2018 in the morning. Detectives Fries and McKee made contact with employees of AutoNow, 10500 E. US 24 Highway, the car lot who originally sold the vehicle and repossessed the vehicle from [REDACTED]. Consent was obtained from a responsible party from AutoNow to search the vehicle. Inside the vehicle, Detective Fries located two receipts dated 04/14/2018. One of the receipts was for Celltronix KC, 1605 U.S. 24 Highway, the other receipt was from The Armory KC, 10531 E. US 40 Highway. On the receipt for The Armory KC, it shows that on 04/14/2018, 50 rounds of 9mm ammunition and a pistol magazine for a SCCY CPX-2 9mm was purchased.

On 04/21/2018 at approximately 2124 hours, Bishop was arrested after being contacted during a traffic stop. Bishop was found to be in possession of a Ruger 9mm pistol. Bishop was placed on a 24 hour investigative hold for being a felon in possession of a weapon. Bishop was interviewed by Detective Royster on 04/22/2018, after Bishop was read his Miranda rights. Bishop admitted to knowingly possessing the firearm. Due to his association with York, Detective Royster questioned Bishop about this case. Bishop subsequently provided a detailed confession about this case. Bishop advised on the night in question, he, York and [REDACTED] drove by [REDACTED] residence. Bishop advised he and York fired rounds from pistols at the residence. Bishop advised York began to firing his pistol, so he (Bishop) began to fire his pistol. Bishop advised he didn't mean for that to happen, when referring to the victim's death. Bishop identified the pistol that was recovered from his person on 04/21/2018, as being the one he used to shoot at the residence of 560 S. Oxford Avenue. Bishop advised York used a SCCY 9mm pistol and had lost one of the magazines in somewhere on Home Street. It should be noted that the magazine that was previously mentioned as being recovered in the area of Lexington Avenue and Cedar Avenue, is only one block west of Home Street.

On 04/24/2018, both [REDACTED] and York were arrested on stop orders issued in reference to this case. [REDACTED] was questioned after she was read her Miranda rights. [REDACTED] admitted she was with Bishop and York on the night of this incident. [REDACTED] advised she was picked up by Bishop in a stolen vehicle. [REDACTED] said that York was already in the vehicle, when she was picked up. [REDACTED] advised Bishop drove to [REDACTED]' residence, where Bishop asked her to lay down. [REDACTED] advised York was in the back seat and when she laid down, she closed her eyes. [REDACTED] said she knew Bishop had a gun but was not sure about York. [REDACTED] advised she heard approximately 7 shots being fired. [REDACTED] advised they fled the scene in the vehicle and she was dropped off at her "mom's" residence. [REDACTED] advised she believed that [REDACTED] killed the victim when she heard he had been arrested. [REDACTED] advised when she heard about Bishops arrest, she tried to reach out to investigators. Enlow advised when she told York, he told her that he was not going to come up because he didn't want to go to jail.

An attempt to interview York was also made. York was escorted from the Detention Unit to the Criminal Investigations Unit. While escorting York, York began to ask about his rights. York was told he would be read his rights. York then stated that there had been four people arrested on this case and investigators were just trying to put a charge on him. York then said he knew nothing about this case other than Williams was responsible. Upon entering the interview room, York was read his Miranda rights. Upon questioning, York was confronted with the fact that two people had placed him at the scene. York subsequently requested an attorney prior to further questioning and the interview was ended.

Detective Christopher Burris # 1401

/S/ Christopher Burris

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Print Name

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Signature