

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

POLICE NO. :	17-086990
PROSECUTOR NO. :	095446283
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
WILLIAM L JOHNSON)	
)	CASE NO. 1816-CR
)	DIVISION
DOB: 07/08/1990)	
Race/Sex: B/M)	
██████████)	
)	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 October 8, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another and after deliberation, knowingly caused the death of Marco D Green 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 October 8, 2017, in the County of Jackson, State of

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Missouri, the defendant committed the felony of murder in the first 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 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 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/ Bryan O. Covinsky
Bryan O. Covinsky (#47132)
Assistant Prosecuting Attorney
415 E. 12th Street, Fl 7M
Kansas City, MO 64106
(816) 881-3368
BCovinsky@jacksongov.org

WITNESSES:

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. DET Jason C. Findley, 1125 Locust, Kansas City, MO 64106

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3. Marco D Green, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. [REDACTED]
64106
5. DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106
6. [REDACTED]
64106
7. DET James H. Price, 1125 Locust, Kansas City, MO 64106
8. PO Dale E. Secor, 1125 Locust, Kansas City, MO 64106
9. DET Timothy R. Taylor, 1125 Locust, Kansas City, MO 64106
10. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/05/2018

CRN: 17-86990

I, Detective James Price #5480, Kansas City, Missouri Police Department
(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 10/08/2017, at 7635 Monroe Ave in
(Date) (Address)

Kansas City, Jackson Missouri William L. Johnson
(County) (Name of Offender(s))

B/M 07/08/1990; committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 10/08/2017 Officers from the Kansas City, Missouri Police Department were dispatched to 7609 Monroe Ave, Jackson County, Kansas City, Mo in regard to a shooting. The victim of the shooting was transported to an area hospital, where he died from his injuries. The Jackson County Medical Examiner's Office ruled the death a homicide.

Surveillance video from the area showed a Black BMW, MO license SR9H2T, which was later determined to be the victim's vehicle, leave being followed by a Black Nissan Altima, MO license DM4X4Y. Both vehicles return a few minutes later and park in the parking lot. The victim is seen exiting the BMW and approaching the passenger side of the Nissan. An unknown subject exited the driver's side of the Nissan and approached the rear of the Nissan. A short time later a muzzle flash is seen coming from the rear driver's area of the Nissan. The Nissan begins to flee then backed up toward the area of the victim. It begins to flee a second time and again backed up towards the victim. The third time the Nissan flees it leaves the parking lot.

While processing the crime scene, several .45 caliber and two 7.62x39 caliber shell casings were located and recovered as evidence.

A computer check revealed the Nissan Altima, MO license DM4X4Y was registered to Jackson Automotive, of Kansas City, Jackson County, Mo. Contact was made with Jackson Automotive, where it was determined the Black Nissan Altima was leased to A computer check showed that William L. Johnson B/M 07/08/1990, was stopped, in the Black Nissan Altima, by Kansas City, Missouri Officers in May of 2017. Johnson recovered the Nissan from the City Tow lot after the arrest in May of 2017. Jackson Automotive records showed Johnson had made multiple payments on the Nissan by calling in the payment using a phone number that was associated with Johnson from his stop in May 2017.

A Jackson County Court Order was issued for Johnson's phone, at which time detectives learned he frequented 400 block of N. Garrison Ave. Ferrelview, MO. On 10/12/2017 Detectives responded to the Anderson House Apartments (407 N. Garrison Ave. Ferrelview, Platte County, Missouri 64163). Contact was made with the office manager who said a black male named William Johnson rents 409 N. Garrison Ave. #307 Ferrelview,

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Platte County, Missouri 64163 and recently paid his rent with a money order from U.S. Bank. Due to the current company only possessing the apartments for a short time, the manager was unable to verify the birthdate for the **Johnson** who lives there.

On 10/12/2017 Detectives responded to U.S. Bank, where the money order was drawn from and were able to verify it was **William Johnson B/M 07/08/1990** who had obtained the money order to make the rent payment to Anderson House.

After verifying the correct date of birth for the **William Johnson** party renting the apartment at Anderson House, a Platte County Search Warrant was applied for and granted. On 10/13/2017 Detectives executed the search warrant. Upon arrival it was determined the lock had been drilled out and the apartment was vacant. Although no evidence directly related to the homicide was located, documents from Nebraska Furniture Mart, issued to **William Johnson**, were observed in a kitchen drawer.

A subpoena for the GPS of the Nissan Altima was issued and the history of the Nissan Altima shows it being in the area of the Ford Motor Plant in Claycomo, MO and 301-419 Garrison St in Ferrelview MO as well as other addresses in Kansas.

It was verified **Johnson** is an employee at the Ford Motor Company in Claycomo, MO and was scheduled to work 10/08/2017 at 1730, which he did not show up for. He was further scheduled to work Monday 10/09/2017 and Friday 10/13/2017 neither shift he had shown up for.

On 10/09/2017 Detectives responded to 10520 Wolcott Dr, Kansas City, KS. Upon arrival we met KCKS Police Officers who stated they were dispatched to this location in regard to a suspicious vehicle. KCKS Officers determined the vehicle was wanted in regard to this investigation and notified the Homicide Unit. The vehicle appeared to have been abandoned and was towed by KCKS Officers with a hold for processing.

On 10/13/2017 the mother of [REDACTED] contacted detectives and said that her daughter, along with **Johnson** and their juvenile child had fled the Kansas City Metro area and were in Marysville, Kansas. [REDACTED]'s mother advised she and her family were currently in Lincoln, NE due to her husband having a stroke and being admitted to a hospital. Contact was made with the brother of [REDACTED], [REDACTED] who advised he was in Lincoln, NE and could provide information regarding [REDACTED] and **William Johnson**.

On 10/14/2017 Detectives responded to the Lincoln, NE Police Department and met with [REDACTED] who provided a formal statement. During his interview, he stated [REDACTED], **Johnson** and their juvenile daughter arrived to his parent's house, in Marysville, KS, on 10/08/2017. He saw her off and on throughout the week and last saw her on 10/12/2017, in Lincoln, NE, when she visited their father in the hospital. [REDACTED] was asked if he knew of **Johnson** owning a firearm or if he had ever seen **Johnson** with a firearm. He stated he knows **Johnson** to have a black in color .45 caliber handgun. [REDACTED] further stated he and **Johnson** have fired that gun on the property owned by the [REDACTED] family, located in Marysville, KS.

On 10/18/2017 Kansas Bureau of Investigations (KBI) Agents met KCPD Detectives in Marysville, KS. KBI Agents obtained a search warrant for the land owned by the [REDACTED] family, from Marshall County, KS and

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assisted in the execution. With the help of [REDACTED] detectives located the area used by [REDACTED] and **Johnson** to shoot firearms. Several .45 caliber shell casings were recovered from the area and forwarded to the KCPD Crime Lab to be compared to shell casings located at the crime scene. Lab results concluded the shell casings located in Marysville, KS, known to have been fired by **Johnson**, matched the shell casings recovered from the crime scene.

Following the execution of the search warrant, information was obtained of **Johnson's** whereabouts. He was located at a [REDACTED] relative's residence. **Johnson** was contacted and stated he did not wish to speak with detectives regarding this investigation.

While processing the crime scene, the victim's cell phone was located and recovered. Upon inspection it was revealed several calls were received, just prior to the homicide, from a party later determined to be a witness, [REDACTED]

On 02/22/2018, [REDACTED] responded to Police Headquarters and provided a statement in regard to this investigation. He stated on the night of 10/07/2017 into the morning of 10/08/2017 he was with **William Johnson** and [REDACTED] B/M 02/16/1992. [REDACTED] positively identified the Nissan Altima as the vehicle he was riding in. He stated **Johnson** was the driver, [REDACTED] was the front seat passenger and he was seated in the back, driver side seat. He observed [REDACTED] with a Draco AK-47 pistol in the vehicle. During the processing of the original crime scene, (2) 7.62x39 caliber shell casings were located and recovered. Early in the morning on 10/08/2017 **Johnson** dropped [REDACTED] off at a female friend's house. He stated when they arrived at her apartment complex, [REDACTED] and [REDACTED] got into a verbal argument due to [REDACTED] trying to rush [REDACTED] out of the vehicle, like he had someplace else to go. Upon exiting the vehicle **Johnson** and [REDACTED] left the apartment complex. [REDACTED] was shown photographs of **Johnson** and [REDACTED] and positively identified both photos as the people he referred to in his statement. He was also shown a photograph of the black Nissan Altima, which he confirmed was the vehicle they were in.

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On 01/10/2018 Detectives were notified by the Kansas City Crime Laboratory in regard to an unconfirmed NIBIN hit involving rounds found at the scene of this murder and rounds collected from a test fire of a Glock handgun that was recovered and released to the owner, **William Johnson B/M 07/08/1990**. It was requested the crime lab compare the rounds from the scene to confirm the NIBIN hit. On 03/27/2018 Detectives received a lab report stating it is the opinion of the examiner that microscopic comparisons of the items showed the cartridge case was fired in the Glock firearm.

Printed Name Det. James Price #5480 Signature Det J P #5480

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

Judge

Circuit Court of _____ County, State of Missouri.