


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

POLICE NO. :	18-066667
PROSECUTOR NO. :	095447817
OCN:	HS004465

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
DAVID W. WORLLEDGE)	
11330 E. Truman Rd.)	CASE NO. 1816-CR
Independence, MO 64050)	DIVISION
DOB: 05/29/1987)	
Race/Sex: W/M)	
)	
	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 August 29, 2018, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Christopher M. Cropp caused the death of Christopher M. Cropp 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 August 29, 2018, 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 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.

Count III. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about August 29, 2018, in the County of Jackson, State of Missouri, the defendant knowingly possessed a a firearm, and on April 1, 2015 was convicted of Tampering in the First Degree (Jackson County case 1416-CR03633), and on July 23, 2014 was convicted of Tampering in the First Degree (Jackson County case 1416-CR01487), and on July 23, 2013 was convicted of Tampering in the First Degree and Resisting or Interfering with a Lawful Stop or Detention (Jackson County case 1316-CR0776), and on July 23, 2014 was convicted of Forgery (Jackson County case 1316-CR02656); and all convictions are felonies under the laws of this State

The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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/ Jennifer S Tatum
Jennifer S Tatum (#70789)
Assistant Prosecuting Attorney
415 E. 12th Street
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Kansas City, MO 64106
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jtatum@jacksongov.org

WITNESSES:

1. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
2. Christopher M. Cropp, 7041 Askew Ave., Kansas City, MO 64132
3. DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127
4. [REDACTED]
64106
5. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
6. [REDACTED]
7. DET Mark A. Slater, 1125 Locust, Kansas City, MO 64106
8. DET Christopher S. Smith,
9. PO Christopher M. Smith, 1125 Locust, Kansas City, MO 64106
10. [REDACTED]
64106
11. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 9/5/2018

CRN: 18-66667

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 8/29/2018, at 7041 Askew Av in
(Date) (Address)

Kansas City, Jackson County Missouri David William Worlledge
(County) (Name of Offender(s))

w/m 5/29/87 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 8/29/18 at approximately 1259 hours, members of the Kansas City Missouri Police Department were dispatched to a single family home of 7041 Askew Av, Kansas City, Jackson County, Missouri, 64132 on a reported shooting. Upon arrival officers discovered a w/m victim, later identified as a resident at that location, Christopher Cropp, w/m, 10/1/81, suffering from apparent gunshot wounds. Cropp was transported from the scene by EMS but pronounced deceased at an area hospital. The Jackson County Medical Examiner's Office ruled the cause of death as multiple gunshot wounds and the manner of death homicide. The victim was shot three times. No shell casings were found at the scene. A pool of blood and bloody clothing were found in the grass just south of the driveway on the front lawn.

A Witness of the shooting stated the residence of 7041 Askew Av has four male residents who rent bedrooms within the residence. The witness stated an individual whom he recognized and identified, had lived with the victim briefly in a bedroom of the residence, but this individual had not been around in a few weeks. This person will be referred to as [REDACTED] throughout the rest of this document. [REDACTED] arrived in the driveway of the residence just before the shooting with two unknown white males. The Witness recognized the vehicle as a Chevrolet Trailblazer SUV and stated it belonged to [REDACTED]. The Witness described the driver of [REDACTED]'s vehicle as a w/m, [REDACTED] was in the front right seat, and another unknown w/m was in the rear seat as they pulled into the driveway. The victim was seated on the front porch of the residence smoking a cigarette upon their arrival. [REDACTED] exited the vehicle and became involved in a verbal dispute with the victim on the front lawn of the premises. The Witness stated the victim was unarmed. The unknown w/m rear seat passenger of the SUV presented a firearm while seated in the rear seat as the victim was standing in his yard. The victim stated something similar to, "What are you going to do shoot me?" At which time the rear seated male fired the gun from inside the vehicle at the victim striking him causing him to fall to the ground. The victim was able to get up and reached inside the suspect vehicle through the front passenger window and removed the ignition key. The same rear seated unknown male fired additional shots from inside the vehicle at the victim as he reached in to remove the ignition key. The victim then fell to the ground on the front lawn of the residence near the driveway's edge. The Witness stated the unknown male who had been driving the SUV approached the victim lying on the ground and took the keys from the victim's hand and re-entered the driver's seat of the SUV. The unknown w/m driver, [REDACTED], and the rear seated male shooter, fled the area in the SUV.

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On 8/30/18 I requested information from a Special Agent with the Missouri Department of Revenue Compliance and Investigation Bureau about any vehicles registered to [REDACTED] as there was no current information in DOR. A 2003 Chevrolet Trailblazer was confirmed to have been purchased by [REDACTED] in July of 2018 from a KC area dealership, and subsequently registered on 8/28/18 from an area DMV. The dealership was contacted and advised the 2003 Chevrolet Trailblazer VIN 1GNET16S136204715 was equipped with a GPS device installed by the dealership. The most recent GPS ping location was on 8/30/18 at approximately 1238 hours which provided the GPS location as 8511 E. 21 St., Kansas City, Missouri.

On 8/30/18 the 2003 Chevrolet Trailblazer VIN 1GNET16S136204715 was subsequently located apparently abandoned without keys on a city street at that location and observed to have MO license plate of PT2A0C, a plate consistent with having been issued to [REDACTED] on 8/28/18 at the time of registration. The 2003 Chevrolet Trailblazer was towed directly to the Vehicle Processing Facility at the city tow lot, 7760 E Front St., Kansas City, Missouri, 64120, pending a search warrant.

On 8/31/18 [REDACTED] was located and interviewed after being read the Miranda Waiver form. [REDACTED] confirmed being present at the time of the shooting at the victim's residence and confirmed the recent registration of the 2003 Chevrolet Trailblazer on 8/28/18 used in the offense. [REDACTED] stated the purpose of going to the victim's residence was to pick up some personal belongings, but the victim refused to allow [REDACTED] to collect the items. [REDACTED] stated there was a brief argument with the victim after exiting the vehicle. [REDACTED] stated the rear passenger shot the victim as he stood outside the vehicle and again when the victim reached into the vehicle to take the key out of the ignition. [REDACTED] stated after the victim fell to the ground after being shot as he leaned inside the vehicle, the male driver kicked the victim as he laid on the ground and removed the keys from his hand, then re-entered the driver's seat of the Chevrolet Trailblazer and all three of them left the area in the SUV. [REDACTED] was then dropped off in a non-specific location after they drove northbound through different neighborhoods from the scene trying to stay inconspicuous. [REDACTED] stated other personal belongings remained in the vehicle when she was dropped off, which included but not limited to [REDACTED]'s cell phone, bag and its contents, and Identification card. [REDACTED] stated all three of them; [REDACTED], the driver, and the shooter used drugs as recent as the night before the shooting. [REDACTED] identified the male driver and the rear seated passenger, each from a six person photo line-up. The shooter was identified as David William Worledge, w/m, 5/29/87 AKA Will Jones.

On 9/4/18 investigators arrested the w/m driver on a 24 hour Investigative HOLD. He was read the Miranda Waiver form and agreed to speak with detectives. The driver stated he drove to the residence on Askew at the direction of [REDACTED] as he had not been there before. He referenced the victim by name as Chris. The driver identified a single color photo of the victim, and identified Worledge from a six person photo line-up as being the shooter. He stated [REDACTED] was in the front right passenger and Worledge was seated in the rear seat of [REDACTED] Chevrolet Trailblazer. He stated Worledge was armed with a 9MM handgun in the vehicle as they drove to the residence on Askew. [REDACTED] wanted to retrieve personal belongings because the victim had threatened to sell them, pawn them, or throw them away. The driver pulled into the driveway and observed the victim seated outside the front door with another male. The victim left the porch and walked towards to the lawn/driveway as [REDACTED] exited the vehicle. [REDACTED] asked the victim for the personal belongings but the victim refused, and then noticed he and Worledge were in the vehicle, and continued to walk briskly towards the vehicle. The driver stated he did not see anything in the victim's hands. Worledge raised his gun up towards the victim as he was seated in the rear

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seat. The victim then stated, "What you gonna do, shoot me bitch?" and continued walking towards the passenger side of the vehicle. Worlledge fired his weapon from inside the vehicle through the front right passenger window which was down. The rear passenger windows were up. The driver believed the victim was struck somewhere near the abdomen and then fell to the ground and moaned. The victim was able to get up and then reached into the vehicle through the front right passenger window and grabbed the ignition keys while the driver and Worlledge were still in the vehicle. Worlledge fired two more times within the vehicle. The driver believed the victim was struck again because he then fell to the ground on the lawn on his side. Worlledge was trying to exit the rear passenger door, but [REDACTED] slammed it shut as Worlledge still had the gun up. The driver stated he was concerned Worlledge may shoot [REDACTED] or the victim and witness because of Worlledge having attempted to exit the vehicle after the victim was on the ground. Worlledge then yelled for the driver to get the keys, so he exited the front driver's door and went to the victim on the ground, used his foot to shift the victim's body to access the keys the victim had clutched near his chest. The driver believed the victim was still alive. The driver pulled them out of the victim's hand, then re-entered the vehicle. The driver left the scene with [REDACTED] in the front passenger seat and Worlledge in the rear seat. The driver stated Worlledge directed [REDACTED] to remove the cell phone battery from [REDACTED]'s cell phone after they left and told the driver to drive the back streets as much as possible to an address on Morrell Av in Kansas City, MO, where the driver and Worlledge resided with Worlledge's girlfriend.

After arriving to the Morrell Av address, the driver stated Worlledge directed him to clean the vehicle out with cleaner and to remove the shell casings from the vehicle and wipe down the blood on the front passenger door. The driver stated he complied and removed three shell casings from the vehicle and then handed them to Worlledge. At Worlledge's direction, the driver also removed [REDACTED]'s property from the vehicle and handed the items to Worlledge. Later that evening on 8/29/18, Worlledge provided the driver with a blonde wig, sunglasses, and a bandana to wear as a disguise to put on after he dropped [REDACTED] off at an area residence in Kansas City, MO, prior to dumping the Trailblazer in an area he described as E. 21st St, off of 23rd St. and I-435. The driver removed the keys from the Trailblazer and then walked to a friend's house and got a ride back to the Morrell Av address and handed the Chevrolet Trailblazer keys to Worlledge.

On the evening of 9/4/18 Worlledge was taken into custody as he exited the Morrell Av address. Worlledge was read the Miranda Waiver form and agreed to speak with detectives. Worlledge denied having any knowledge of a homicide, and denied knowing [REDACTED], the driver, or recognizing the victim. Worlledge also denied residing at the Morrell Av address.

On the evening of 9/4/18 a search warrant was executed on the Morrell Av address and some of the items recovered included but were not limited to a 9MM handgun and 9 MM and .40 caliber ammunition located in a bedroom associated with Worlledge. A crystal rock substance in a plastic bag was also found within the same bedroom. Personal items associated with [REDACTED] were located within a common area of the residence.

On 9/5/18 a Search Warrant was executed on the Chevrolet Trailblazer and the vehicle appeared to apparently have been wiped down as there were apparent streak marks on the windows. No shell casings were located inside the vehicle.

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On or about August 29, 2018, in the County of Jackson, State of Missouri, Worlledge knowingly possessed a firearm, and on April 1, 2015 was convicted of Tampering in the First Degree (Jackson County case 1416-CR03633), and on July 23, 2014 was convicted of Tampering in the First Degree (Jackson County case 1416-CR01487), and on July 23, 2013 was convicted of Tampering in the First Degree and Resisting or Interfering with a Lawful Stop or Detention (Jackson County case 1316-CR0776), and on July 23, 2014 was convicted of Forgery (Jackson County case 1316-CR02656); and all convictions are felonies under the laws of this State of Missouri.

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

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

Judge

Circuit Court of _____ County, State of Missouri.