


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

<b>POLICE NO. :</b>	19-024839
<b>PROSECUTOR NO. :</b>	095453039
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>TRACY FRENCH</b>	)	
<b>9552 Charlotte</b>	)	<b>CASE NO. 1916-CR</b>
<b>Kansas City, MO 64131</b>	)	<b>DIVISION</b>
<b>DOB: 11/03/1993</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted  
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-  
003Y19840999.0)**

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 April 5, 2019, in the County of Jackson, State of Missouri, Deontae Campbell was killed by being shot as a result of the perpetration of the class A felony of Unlawful Use of a Weapon under Section 571.030, RSMo committed by the defendant on or about April 5, 2019, in the County of Jackson, State of Missouri.

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.

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### **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 April 5, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree as charged in Count I, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of 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.

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 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 5, 2019, at 63rd and Paseo, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a blue Volkswagen, and as a result of the above described conduct, Deontae Campbell 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 IV. 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 April 5, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon, as charged in

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Count III, all allegations of which are incorporated here 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.

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/ P. Benjamin Cox*  
P. Benjamin Cox (#60757)  
Assistant Prosecuting Attorney  
415 E. 12th St., Fl 7M  
Kansas City, MO 64106  
(816) 881-3975  
BCox@jacksongov.org

**WITNESSES:**

1. [REDACTED]. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED] 12th St, Floor 11, Kansas City, MO 64106
3. [REDACTED] 415 E 12th St, Floor 11, Kansas City, MO 64106
4. PO Laura K. Easley, 1125 Locust, Kansas City, MO 64106
5. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
6. Tracy French, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. PO Jeremy W. Gragg, 1125 Locust, Kansas City, MO 64132
8. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106

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9. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 06-01-2019

CRN: 19-24839

I, Det. Thomas Hammond #4775  
(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 04-05-2019, at 63<sup>rd</sup> and Paseo in  
(Date) (Address)

Kansas City, Jackson Missouri Tracy D. French  
(County) (Name of Offender(s))

B/M, 11-03-1993 committed one or more criminal offense(s).  
(Description of Identity)

Murder, Unlawful Use of a Weapon, Assault (Agg), Resist Arrest

The facts supporting this belief are as follows:

On 04-05-2019, at 1908 hours, Kansas City Missouri Police Officers were dispatched to the intersection of 63<sup>rd</sup> Street and Paseo, Kansas City, Jackson County, Missouri, in regard to an armed disturbance. Upon arrival officers observed a blue Volkswagen crashed into a business located at 1316 E. 63<sup>rd</sup> Street. Officers observed the driver, a 17 year old male, suffering from a gunshot wound to his head and the passenger, a 17 year old male, suffering from injuries from the crash. The driver was transported to a local hospital where he later died from his injuries.

The passenger, stated he and the driver, had just left the Landing Mall and turned east on Meyer from the south Landing Mall parking lot near the Wendy's. stated he observed a black male, later identified as Tracy D. French, B/M, 11-03-1993, standing in the street who began shooting at their car. stated swerved in an attempt to avoid being shot but sustained a gunshot to the head and lost control of the vehicle. stated he attempted to control the vehicle but was unable to stop it and the vehicle struck a building.

Detectives and Crime Scene Technicians responded and processed the scene. A black Samsung cellphone and several spent shell casings were recovered. The cellphone was located in the street near the area French ran after the shooting. Surveillance video from businesses in the area was also recovered and viewed. A red two door sedan was observed exiting the north side Landing Mall parking lot and turn east on 63<sup>rd</sup> Street. No vehicle exited behind the red car and it was not being chased or followed by any other vehicle. The vehicle appears to accelerate quicker than the traffic around it and turn south on Paseo and stopped at the intersection to turn east onto Meyer. French gets out of the driver side of the vehicle and walks to the east where he raises his hand as if he has a gun and is pointing it at someone but due to the distance of the camera you cannot clearly see the gun. The red car drives away and French runs east from the scene and the Volkswagen is observed driving northbound through the Landing Mall parking lot at a high rate of speed where it crashes into 1316 E. 63<sup>rd</sup> Street. is observed climbing/falling out of the front passenger window.

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On 05-08-2019, French’s mother, Tracy French, responded to Police Headquarters and provided a formal statement regarding the murder. Tracy stated she overheard French talking to his girlfriend, [REDACTED], who had asked French, “why you do dat, they didn’t have no gun?” Tracy stated [REDACTED] had let French out of the car and French did the shooting. Tracy also stated French drove a red Chevy Cobalt.

On 05-30-2019 I was advised French’s DNA was located on the black Samsung cellphone recovered from the scene. A stop order was issued for French’s arrest and a contact and advise was issued for Birdsong. On 05-31-2019 both French and [REDACTED] were arrested and transported to Police Headquarters for questioning. After French had been told he was under arrest he attempted to flee on foot but was apprehended. French had attempted to enter his Red Chevy Cobalt twice while running from officers. Officers located keys to the vehicle in French’s pocket.

[REDACTED] stated [REDACTED] is her child’s father and he had taken her phone from her in Grandview. [REDACTED] stated she was supposed to meet [REDACTED] at the Landing Mall to give her cellphone back. [REDACTED] stated when she got there [REDACTED] started running towards her and Campbell was yelling at him telling him “no, Kareem.” [REDACTED] stated she started running and Campbell grabbed Kareem and she was able to get into the car and leave. [REDACTED] stated French was driving and there were two other females in the car with them. [REDACTED] g stated French was driving fast and was “acting crazy.” [REDACTED] stated French got out of the car and was walking in the street. [REDACTED] drove off and as she was driving away she heard several shots immediately as she was leaving. [REDACTED] stated she knows French has carried a black pistol in the past. [REDACTED] stated she had French’s car for a couple of weeks after the murder and had left it at a Sonic.

After waiving his Miranda Rights French originally stated he did not know anything about the murder and stated he was at him mother’s house during the time the murder happened. French later admitted to shooting at [REDACTED] and Campbell while they were in their vehicle. French stated [REDACTED] had just robbed him and [REDACTED] and was driving towards them hanging out the passenger window with a gun. French stated [REDACTED] and Campbell had been chasing him, [REDACTED] and other occupants of his car. French admitted to owning a Red Chevy Cobalt. No gun was found at the scene, nor was one found on Abernathy’s person.

Printed Name Det. Thomas Hammond #4775 Signature /s/ Det. Thomas Hammond #4775

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.