

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

POLICE NO. :	KC20001088
PROSECUTOR NO. :	095456978
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
ANDERSON D. WHITE	)	
11012 East 75th Street	)	CASE NO. 2016-CR
Kansas City, MO 64138	)	DIVISION
DOB: 09/12/1994	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y19840904.0)

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 January 5, 2020, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, knowingly or with the purpose of causing serious physical injury to Earl Finch III caused the death of Earl Finch III by shooting him.

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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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 5, 2020, in the County of Jackson,

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State of Missouri, the defendant, either acting alone or purposely in concert with another, 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, or another, 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.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Lauren D. Barrett
Lauren D. Barrett (#62062)
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WITNESSES:

1. PO Corey C. Ballew, 1125 Locust, Kansas City, MO 64106
2. Earl Finch III, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
4. PO Drew D. Pittenger, 1125 Locust, Kansas City, MO 64106
5. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01-08-2020

CRN: 20-1088

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 01-05-2020, at 4933 Walrond in
(Date) (Address)

Kansas City, Jackson Missouri Anderson D. White
(County) (Name of Offender(s))

B/M, 09-12-1994 committed one or more criminal offense(s).
(Description of Identity)

Murder, ACA, UUW

The facts supporting this belief are as follows:

On 01-05-2020, at approximately 1221 hours, Kansas City Missouri Police Officers were dispatched to 4933 Walrond, Kansas City, Jackson County, Missouri, in regard to a shooting. Upon arrival officers observed a 41 year old black male laying in the driveway deceased from several apparent gun shots. Officers observed several spent shell casings on the ground near the victim.

Detectives at the scene were able to download and view surveillance video from a neighboring house which revealed two black male suspects, later identified as Anderson D. White, b/m, 09-12-1994 and Darren D. Hamilton, b/m, 09-09-1994 drive north bound past the victim's residence in a dark colored four door sedan. The vehicle appeared to be a Chevy Impala and a large unique dent was observed on the rear passenger bumper. The vehicle was parked facing north on the east side of the street and the White and Hamilton exited the car. White exited from the driver's seat and Hamilton exited the passenger seat and began to walk south on the sidewalk towards the victim's residence. White was dressed in a dark colored hooded shirt/jacket with what appeared to be a red colored logo on the front and writing on the both sleeves and back, dark colored pants and light colored tennis shoes. Hamilton was wearing a dark colored jacket, blue shirt underneath, dark sweatpants and was wearing glasses. White and Hamilton approached the victim and shot him several times. White and Hamilton run back to the car and leave the scene with White driving. 15 shell casings were located at the scene. 11 of the casings were 9mm and 4 of them were .45 caliber.

Detectives were also able to locate video from the area of 51st and Walrond which showed the Impala driving north on Walrond from 51st street. The video provides a clear shot of the passenger and facial features and clothing is visible. A computer check showed White and Hamilton had previously been arrested together and a photo of Hamilton was compared to a screenshot of the video. It was determined Hamilton was the person in the screenshot of the video.

A photo of the vehicle that was taken from the surveillance video from the scene was distributed throughout the police department showing the vehicle and obvious unique damage to the rear bumper. On 01-06-2020, at approximately 1643 hours, officers observed a blue Chevy Impala License# NB0S6X, Mo, with the unique damage to the rear bumper matching the photograph. Officers conducted a car check and took 3 people into

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custody. Investigation revealed the occupants of the vehicle were not involved in the murder. The vehicle was towed to the city tow lot for processing. A computer check of the vehicle license responded to a Anderson White with an address of 11012 E. 75th, Raytown, Jackson County, Missouri.

Detectives responded to 11012 E. 75th and spoke to the parents of White who advised on 01-05-2020 they were at church during the time of the murder but further stated the vehicle hadn't been driven because White was sick. Contact was made with White who stated the vehicle was parked and had not been driven on 01-05-2020. Detectives were able to locate surveillance video from the area of 11012 E. 75th which showed the vehicle being driven east on 75th street on 01-05-2020, at approximately 1228 hours, which is approximately 7 minutes after the initial 911 call after the murder. Detectives were also able to locate a receipt inside the Impala which showed a purchase from a Burger King at 9945 E. 350 Highway, on 01-05-2020, at 1100 hours. A subpoena was served regarding the the account holder for the debit/credit card number used to make the purchase at the Burger King. The credit/debit card used to make the purchase was registered to White and also listed his current address.

On 01-08-2020, at approximately 1200 hours, Hamilton was arrested and transported to Police Headquarters for questioning. Hamilton admitted he was the person in the passenger seat of the vehicle and also stated White was the driver. Hamilton admitted to shooting the victim after White had shot him. Hamilton admitted to possessing a .45 caliber when White picked him up and admitted to shooting the victim with a .45 caliber.

On 01-07-2020, at approximately 1700 hours, White was arrested and transported to Police Headquarters for questioning. White refused to give a statement and invoked his Miranda Rights.

Det. Thomas Hammond #4775
Printed Name _____ 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.