

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

POLICE NO. :	KC20023202
PROSECUTOR NO. :	095458787
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
LAWRENCE PERKINS)	
5515 Lydia Ave)	CASE NO. 2016-CR
Kansas City, MO 64110)	DIVISION
DOB: 04/02/1994)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

**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 4, 2020, in the County of Jackson, State of Missouri, Shea Henry was killed by being shot as a result of the perpetration of the class B felony of Unlawful Use of a Weapon under Section 571.030.1(9), RSMo committed by the defendant on or about April 4, 2020, 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.

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

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571.015.1, RSMo, in that on or about April 4, 2020, 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 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 Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20145299.0)

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 B 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 4, 2020, at 5901 Troost Ave, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a 2007 Volkswagen Passat.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

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

WITNESSES:

1. PO Anthony Helfrich, 1125 Locust Street, Kansas City, MO 64106
2. DET Sean P. Martin, 1125 Locust, Kansas City, MO 64106
3. DET James H. Price, 1125 Locust, Kansas City, MO 64106
4. DET Steffan I. Roetheli, 1125 Locust, Kansas City, MO 64106
5. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
6. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/14/2020

CRN: 20-23202

I, Det. 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 04/04/2020, at 5901 Troost Ave. in
(Date) (Address)

Kansas City, Jackson Missouri Lawrence Perkins
(County) (Name of Offender(s))

b/m 04/02/1994; [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 04/04/2020 at approximately 0107 hours, officers with the Kansas City, Missouri Police Department were dispatched to 5901 Troost Ave, Kansas City, Jackson County, Missouri in regard to a shooting. Upon arrival, officers located the victim sitting in the driver seat of a silver in color 2007 Volkswagen Passat, MO license plate XE6 C9C, VIN: WVWTK73C67E001544. KCFD EMS responded and pronounced the victim deceased. The Jackson County Medical Examiner's Office later ruled the death a homicide.

Responding officers contacted Lawrence Perkins b/m 04/02/1994 and took him into custody at the scene. While taking Perkins into custody, officers located and removed a firearm from Perkins' hooded sweatshirt pocket. Officers preserved the firearm at the crime scene. Upon recovering the firearm, Crime Scene personnel and Detectives noted the firearm to contain no live ammunition, with the slide locked to the rear, indicating it was fired until empty.

Perkins was transported to Police Headquarters and advised of his Miranda Rights. Perkins stated he understood his rights and provided a formal statement regarding this investigation. Perkins stated on 04/04/2020 he was driving home from work and stopped at the convenience store at 5901 Troost Ave. He observed a dark gray Ford Fusion, occupied by a Hispanic or white male driver and a Hispanic female passenger. The Fusion circled around the parking lot and returned to a parking space, as Perkins was parking his vehicle. Perkins went into the store for approximately 2-3 minutes before exiting. As he exited the store, he observed the Fusion leaving the parking lot at a high rate of speed. Perkins then observed the Hispanic female from the Fusion, in the driver seat of his vehicle, the silver Volkswagen, stealing his car. Perkins drew his firearm, ran to his vehicle and attempted to open the door. Before he could open the door, the victim reversed the vehicle, knocking Perkins backward. Perkins then fired, he believed, approximately 6 rounds at the vehicle and victim. His vehicle then continued through the parking lot, before striking a tree and coming to a stop. Perkins entered the vehicle and put it in park, then called 911.

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Detectives contacted the store employee who provided surveillance video of the incident. Camera 11 was reviewed and shows to begin on 04/04/2020 at 0100 hours. At 01:02:46 hours the gray Ford Fusion appears on video and circles the parking lot. At 01:02:58 hours Perkins' vehicle enters the video, passing the Fusion and parking. The Fusion then backs up momentarily, before circling the lot again and parking. At 01:03:31 hours, Perkins exits his vehicle and enters the store. Perkins briefly looks back at the Fusion as it parks. At 01:03:50 hours the victim exits the Fusion passenger seat. As the victim walks to the driver side of Perkins' vehicle, the Fusion drives out of camera view. The victim enters Perkins' vehicle and begins to reverse before stopping suddenly. At 01:04:05 hours, Perkins runs out of the store, toward the driver side of his vehicle. Before he could reach the door, the victim begins reversing, striking Perkins with the front of the vehicle. Perkins is knocked backwards and begins firing his weapon at the vehicle. Both Perkins and the vehicle then leave camera view. The clip ends at 01:09:57 hours.

While investigating the crime scene, Detectives observed 10 spent .45 caliber shell casings. There appeared to be 10 defects in the vehicle.

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

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

Judge

Circuit Court of _____ County, State of Missouri.