

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

POLICE NO. :	KC21087752
PROSECUTOR NO. :	095467661
OCN:	HS030689

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
WILLIAM F BETTS)	
7334 Arleta Blvd.)	CASE NO. 2116-CR
Kansas City, MO 64132)	DIVISION
DOB: 11/22/1977)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 December 27, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Naaman Williams caused the death of Naaman Williams 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 (571.015-001Y20205213.0)

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 December 27, 2021, in the County of Jackson, State of

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Missouri, the defendant committed the felony of murder in the second degree charged in Count One, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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.

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/ Jeannette Wolpink
Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-1776
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WITNESSES:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED], 415 E 12th St, Floor 11, Kansas City, MO 64106
4. PO Alex M. Saragusa, 1125 Locust, Kansas City, MO 64106
5. DET Ethan R Skinner,
6. Naaman Williams, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 12-28-2021

CRN: KC21087752

I, Detective Ethan Skinner #5677 of the 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 12-27-2021, at 6018 Agnes Avenue in
(Date) (Address)

Kansas City, Jackson Missouri William F. Betts
(County) (Name of Offender(s))

B/M, DOB 11-22-1977 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 12-27-2021 at approximately 1849 hours, officers with the Kansas City Missouri Police Department were dispatched to 6018 Agnes Avenue, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, officers observed a black male lying on the front steps of the residence leading up to an enclosed porch suffering from an apparent gunshot wound. Kansas City Fire Department personnel responded and declared the black male deceased at the scene at approximately 1900 hours.

An investigation of the crime scene revealed the victim lying on the front steps of the residence. The victim had suffered at least one apparent gunshot wound to the head. One (1) spent shell casing with the head stamp "NATO WMA" was located just inside the enclosed porch at the top of the steps. One (1) additional spent shell casing with the same head stamp was located behind the residence. One (1) spent projectile was located on the step just above the victim's position. The inside of the residence was highly cluttered but a cursory walk-through did not reveal any other items of apparent relevance. An external body examination was conducted at the Jackson County ME's Office on 12-28-2021 at which time it was confirmed that the victim had sustained one gunshot wound which entered at the bridge of the nose and exited through the back of the neck. Stippling was observed about the victim's face and eyes. The victim had also sustained what appeared to be a minor abrasion to the forehead consistent with falling on the concrete steps on which he was found by responding police and fire personnel. There were no other noted significant injuries. The victim was positively identified by fingerprints as Naaman E. **Williams**, B/M, 3-3-1975.

While investigators were on-scene, a witness alerted officers that the male who had shot the victim was at the corner of E 60th Street / Agnes Avenue. **William F. Betts III, B/M, 11-22-1977** was taken into custody without incident and was placed under investigative arrest.

Detectives contacted several witnesses at the scene and obtained the following statements:

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Witness 1 stated that he is a resident of 6018 Agnes Avenue. Witness 1 explained that he, **Williams**, and **Betts** have all known one another since high school. Witness 1 stated that Williams and Betts had been engaged in a confrontation on 12-25-2021 over a matter of disrespect. During that confrontation, Williams had “pistol-whipped” Betts and caused Betts to bleed from the nose and the back of the head. Witness 1 had taken the firearm away from Williams and the fight had eventually ceased, at which time Williams left the location. Betts remained at the house for the next couple of days. During that stay, Betts never changed clothes and Betts’ girlfriend had come to the house at some point. After her visit, Witness 1 noticed that Betts was now in possession of a silver handgun, which he had not had before. At the time of this shooting, Witness 1 had been seated in his vehicle in front of the residence. He noted that Williams and others were approaching the house and heading inside when Betts opened the door from inside the house and appeared on the porch. Witness 1 thought nothing of it and looked down, at which time he heard a single sound of a gunshot. Witness 1 looked up and saw Williams falling to the ground where he stood on the steps. Witness 1 got out of his car and chased Betts into and through the house where Betts exited through the back door, still carrying the silver handgun. Witness 1 stopped pursuing Betts and went back to the front of the house. Witness 1 stated that, between the fight two days prior and the shooting incident, he has heard Betts several times comment that he was going to kill Williams.

Witness 2 stated that she saw Betts at the location on 12-26-2021 and noticed that he had a bandage on his nose. Betts told Witness 2 that he had been in a car crash and hit his face on the dash. Outside of Betts’ company, Witness 2 asked another resident what had happened and she was told that Betts had recently been in a fight with Williams. Witness 2 stated that she stayed the night at the location into 12-27-2018 and left the residence at about 0900 hours that morning. Prior to leaving, Witness 2 stated that she saw Betts with a silver handgun and noted that she does not know him to typically carry a handgun. Witness 2 stated that she came back to the residence on 12-27-2021 in the evening and had noticed a white Chevrolet Impala that belongs to Betts’ girlfriend parked out front and assumed that Betts was there, however nobody could seem to find him in the house. Williams arrived at the location and Witness 2 went with Williams and another party to get food from a nearby store. Upon their return to the residence, Witness 2 was close behind Williams as they approached the front porch to enter the house. Witness 2 heard a loud “pop” and began looking around the block thinking that a gunshot had been from somewhere nearby. As she turned back toward the house, she noticed Williams slumped on the steps. Witness 2 made a statement to the effect of, “William, you didn’t have to do this!” but when asked follow-up questions stated that she did not see Betts. During her statement, Witness 2 also stated that “Will shot my cousin” but would, again, claim she had not seen Betts during the incident when asked to clarify.

Witness 3 had not directly witnessed the shooting incident, but also reported having heard Betts making repeated claims that he would kill Williams.

Betts was contacted by detectives at the East Patrol Division detention unit where he was advised of his Miranda Rights and agreed to speak to detectives. Betts stated that he regularly associates with the residents of 6018 Agnes Avenue. Betts claimed to not know Williams. When asked about any recent altercations, Betts claimed he had fought with an unknown party named, “Jake.” Betts had a bandage over his nose at the time of contact and detectives noted that his shirt in his property bag had blood on it, likely consistent with his own injury as described by witnesses from the prior altercation.

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Printed Name Det. Ethan Skinner #5677 Signature /S/ Det. Ethan Skinner #5677

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

Judge

Circuit Court of _____ County, State of Missouri.