

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

<b>POLICE NO. :</b>	22-016738
<b>PROSECUTOR NO. :</b>	095468780
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>CAMOI J. HENDRICKS</b>	)	
<b>9202 Corrington Avenue</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64131</b>	)	<b>DIVISION</b>
<b>DOB: 11/09/1992</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200904.0)**

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 March 14, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Kirk M Whittaker caused the death of Kirk M Whittaker 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 (571.015-001Y20205299.0)**

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 571.015.2, RSMo, in that on or about March 14, 2022, 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 II, 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 firearm, and on or about September 30, 2014, in Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action in case 1416-CR00164-01.

Defendant is punishable by sentence to an extended term of imprisonment under Sections 571.015 and 557.036, RSMo, in that he has been previously convicted of a felony and therefore, it is unlawful for the defendant to possess a firearm pursuant to Section 571.070, RSMo. The previous felony conviction is as follows:  
1. On or about September 30, 2014, defendant was found guilty of the felonies of robbery in the second degree and armed criminal action in the Circuit Court of Jackson County Missouri.

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,

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*/s/ Kelly Collins*  
Kelly Collins (#68006)  
Assistant Prosecuting Attorney  
415 East 12th Street  
7M Floor  
Kansas City, MO 64106  
(816) 881-3555  
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**WITNESSES:**

1. PO Robert A. Ballowe, 1125 Locust, Kansas City, MO 64106
2. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
3. [REDACTED] MO  
64106
4. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
5. [REDACTED]  
64106
6. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
7. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
8. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
9. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106
10. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106  
[REDACTED]  
64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 03/19/2022

CRN: 22-016738

I, Det. Adison Waterman #5789  
(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 03/14/2022, at 8105 E Bannister Road in  
(Date) (Address)

Kansas City, Jackson Missouri Camoi Hendricks  
(County) (Name of Offender(s))

B/M 11-09-1992 committed one or more criminal offense(s).  
(Description of Identity)

***Murder***

***ACA***

***Felon in Possession of a Firearm***

***Tampering with Evidence***

***Delivering, Distributing and Manufacturing a controlled substance***

The facts supporting this belief are as follows:

On 03/14/2022 at 1305 hours Officers of the Kansas City Missouri Police Department were dispatched to 8105 Bannister Rd, Kansas City, Jackson County, Missouri (Phillips 66) on a reported shooting.

Upon arrival Officers observed a black Lexus 4 door parked at the gas pump. Officers observed what appeared to be a bullet hole through the driver’s side rear window. A male was slumped over in the driver’s seat. The victim appeared to have been shot in the left shoulder. The victim was transported to an area hospital where he was pronounced deceased. The victim was identified as Kirk Whittaker, b/m, 01/08/1988

Surveillance video was obtained from the area that depicted the suspect entering the store, holding a cell phone in his hand and using a credit card to purchase gas prior to the shooting. The suspect was observed to be wearing all black clothing with the word “PARANOID” in white across his shorts. The store clerk advised the gas transaction was canceled due to the suspect selecting the wrong grade of gas. Surveillance video further depicts the suspect exiting the store and entering the victim’s vehicle on the passenger side. The suspect is inside the vehicle for several minutes. He then exits the vehicle and walks over to his BMW which was parked just to the west of the victim’s vehicle. The suspect then walks back to the victim’s vehicle and the suspect re-enters the front passenger seat. As he begins to exit the vehicle, he is seen leaning into the vehicle several times. The suspect then leaves the scene westbound on Bannister Rd in the black BMW at a high rate of speed. A short time later, officers arrive on scene and locate the victim in the driver’s seat of the Lexus suffering from gunshot wounds. Two 9mm shells casings were recovered out of the victim’s vehicle.

A witness came forward and stated he was childhood friends with the victim. On 3/14/22, he was on the phone with the victim when the victim stopped at the Phillips 66. He heard the victim walk into the store and buy an item. He heard a male in the background who seemed to be talking to the victim. The witness stated the victim went back to sit in his vehicle and he continued to talk to him for several minutes. During their conversation, he heard an unknown male get

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inside the victim's vehicle and could hear the conversation. He described the two having a conversation about purchasing something "probably illegal." He could hear the unknown male asking the victim if he uses a "cash app?" The victim was heard saying, "No, cash." The witness never heard a disturbance inside the car. He also did not hear any gunshots, but stated he was driving his work truck and it is very loud. The witness stayed on the phone and eventually heard what he believed to be police officers, stating he could hear the police radio and them talking about gunshots. He said "hello" a few times and then believed something bad happened so he hung up.

On 03/17/2022 a witness called Detectives and reported the suspect came back to the store on 03/17/2022. He stated the suspect was asking questions about the store's surveillance cameras and if they gave the footage to the police. Detectives reviewed surveillance video on 03/17/2022 at 8105 Bannister and observed the suspect driving a white Hyundai Sonata with Missouri Temp Tag 05UWXY. A search of the license plate revealed the registered owner to be [REDACTED]. A search of [REDACTED] revealed her husband to be Camoi Hendricks, b/m, 11/09/1992. Police reports were discovered with Camoi Hendricks where he was listed driving a black BMW 325i with a Missouri temporary tag of 05WW1L. A check of the temporary tag responded to Camoi Hendricks. The black BMW registered to Camoi Hendricks matches the description of the suspect vehicle seen in security footage leaving the scene after the murder.

Upon viewing pictures of Camoi Hendricks he appeared similar in appearance to the suspect seen in the surveillance video at 8105 Bannister Rd. A witness advised the suspect had a tattoo of a tear drop and a cross next to his eyes. A picture of Camoi Hendricks showed he had a tattoo of a cross and a tear drop next to his eyes. The witness was shown a photo lineup which included Camoi Hendricks and 5 unrelated fillers who were all similar in appearance. The witness identified Camoi Hendricks in the photo lineup as the person he saw at 8105 Bannister Rd at the time of the murder.

Detectives determined the white Hyundai Sonata, Missouri temporary tag 05UWX7 was purchased at Instant Auto located at 2151 NE Independence, Lee's Summit, Missouri by [REDACTED]. On 3/18/22, detective's contacted employee's at Instant Auto who provided "Reference" paperwork filled out by Darmaishea Hendricks indicating Camoi's phone number was 346-455-3903. Employees also provided detectives with log in information to the GPS tracking sytem on the vehicle. GPS coordinates show the White Hyundai Sonata parked multiple times at the address of 9202 Corrington Avenue, Kansas City, Jackson County, Missouri. A search of utilities at 9202 Corrington Avenue revealed Darmaishea Jones activated water services to that address on 03/04/ [REDACTED] is the wife of Camoi Hendricks.

On 03/19/2022 members of the Kansas City Missouri Police department Career Criminal Unit were conducting surveillance on 9202 Corrington Avenue where Camoi Hendricks was believed to be living with his wife. Members of the Career Criminal Unit observed a black male wearing grey exit the residence and begin walking southbound on Corrington Avenue where he was taken into custody. Camoi Hendricks was transported to Police Headquarters and placed in interview room #2 on the 7<sup>th</sup> floor.

While on-scene, members of the Career Criminal Unit observed a white Hyundai Sonata parked in the driveway in the rear of the residence. Detectives obtained a search warrant for the residence and were able to locate a black BMW 328i in the garage. A search warrant was obtained for the black BMW and the the black BMW was towed to the city tow lot for processing.

On 03/19/2022, detectives contacted Camoi Hendricks who stated the following after waiving his Miranda rights: He arrived at 8105 E Bannister Road on 03/14/2022 around 1245 hours. While he was at the aforementioned address, the victim "hollard" at him and said "Hey smoke". He stated he turned around and saw the victim was talking to him and he told the victim he would be back out in a minute. Hendricks then met the victim at his vehicle that was parked at the pumps. Hendricks entered the vehicle and stated he showed the victim a small amount of marijuana he had in his pocket. The victim told him he was looking for two "zips" which weighed 28 grams a piece. Hendricks stated he told the victim

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he had to run to his car and get the marijuana and when he came back to to the victims car he had a bag containing 5 “zips” a scale and some baggies. Hendricks stated as he began to weigh out the marijuana, the victim pulled a gun. When the victim pulled the gun, Hendricks stated he slapped the gun that was in the victims hand causing it to discharge. When the gun discharged, Hendricks stated he was grazed on the top of his left hand and showed detectives the graze wound. Hendricks stated a fight over the gun ensued and the gun went of a second time. After the gun went off a second time, the victim slumped over. Hendricks gathered the marijuana, the scale and the baggies and his backpack he had brought to the vehicle. Hendricks stated he saw the gun laying in the seat and left the gun in the vehicle. After lying for several hours, Hendricks eventually stated he took the gun from the scene when he left. Hendricks was never able to fully describe how the victim sustained his injuries. It should be noted that the evidence in this case does not support Hendricks statement.

A warrant is requested for Camoi Hendricks, and a bond is requested to be associated with that warrant due to the following factors: the likelihood of more violence if Camoi Hendricks is released, and the severity of the offense, which resulted in the victim’s death. Camoi Hendricks has been previously convicted of 2<sup>nd</sup> Degree Robbery with a seven year confinement and resisting arrest with injury with a 4 year confinement.

Printed Name Det. Adison Waterman #5789 Signature /S/ Det. Adison Waterman #5789

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

\_\_\_\_\_  
Judge

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