


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC22083514
PROSECUTOR NO. :	095472612
OCN:	

STATE OF MISSOURI,)	
)	
PLAINTIFF,)	
vs.)	
)	
FRANCISCO J ENRIQUEZ)	
2017 Quincy Ave)	CASE NO. 2216-CR
Kansas City, MO 64127)	DIVISION 1
DOB: 01/07/1971)	
Race/Sex: H/M)	
)	
)	
DEFENDANT.)	

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

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 14, 2022, in the County of Jackson, State of Missouri, the defendant knowingly, or with the purpose of causing serious physical injury to Curtis Henderson, caused the death of Curtis Henderson by shooting him, and defendant is further given notice that, should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Curtis Henderson as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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.)

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 571.015.3, RSMo, in that on or about on or about December 14, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree as charged in Count 1, 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, and

On or about December 17, 2001, in the Circuit Court of Jackson County, Missouri, the defendant was convicted on two counts of the offense of armed criminal action.

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.

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Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205299.)

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 December 14, 2022, at 3611 Jefferson Street, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at an inhabitable structure, 3611 Jefferson Street.

For the first violation of this crime a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony. 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.

Count IV. Armed Criminal Action (571.015-001Y20205299.)

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 571.015.3, RSMo, in that on or about on or about December 14, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon as charged in Count 3, 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, and

On or about December 17, 2001, in the Circuit Court of Jackson County, Missouri, the defendant was convicted on two counts of the offense of armed criminal action.

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

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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.

Count V. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205299.)

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 E felony of unlawful use of a weapon, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 14, 2022, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a handgun, a weapon readily capable of lethal use, in an angry or threatening manner.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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.

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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]
2. DET Jonathan E. Cook, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]
4. [REDACTED]
5. Curtis C Henderson, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. [REDACTED]
7. CST Ann M. Mallot, 2645 Brooklyn, Kansas City, MO 64127
8. CST Lori Nelson (Collado), 1125 Locust, Kansas City, MO 64106
9. CST Pamela Owens, 1125 Locust, Kansas City, MO 64106
10. [REDACTED]
[REDACTED] 64106
11. PO Davonte G Porter, 1125 Locust, Kansas City, MO 64106
12. PO Stephen Sell, 1125 Locust, Kansas City, MO 64106
13. PO Clayton True, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
14. PO Allan E Walker-Perkinson, 1125 Locust, Kansas City, MO 64106
15. [REDACTED],

PROBABLE CAUSE STATEMENT FORM

Date: 12-17-2022

CRN: KC22083514

I, Detective Jonathan Cook #5572
(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 12-14-2022, at 3611 Jefferson Street in
(Date) (Address)

Kansas City, Jackson Missouri Enriquez, Francisco 01-07-1971
(County) (Name of Offender(s))

W/M committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 12-14-2022 at 0110 hours, Officers of the Kansas City Missouri Police Department were dispatched to 3611 Jefferson Street, Kansas City, Jackson County, Missouri on a reported Sound of Shots call. Upon arrival to the address officers located a bleeding male, later determined to be Curtis Henderson, lying on the front porch of the residence. EMS responded to the scene and pronounced Henderson deceased at 0135 hours. Officers located four witnesses inside the residence.

Detectives of the Kansas City Missouri Police Department’s Homicide Unit were notified and responded to the scene. Detectives located surveillance video at a nearby residence, 3[redacted] Jefferson St., which does not capture video footage of the incident but does capture the apparent audio. In viewing the footage, three gunshots can be heard in proximity to 3[redacted] Jefferson St. The video shows the first gunshot to be heard at 0106 hours on 12-14-2022, with the second gunshot approximately 15 seconds after the first, and the third gunshot approximately one minute and 15 seconds after the second gunshot. Screaming voices can be heard as the shots are being fired.

Detectives contact witness [redacted], who stated he is a resident of 3611 Jefferson St. [redacted] was alerted by Henderson that someone was breaking into the Ford Explorer parked in the driveway of the residence [redacted] Henderson, and another witness [redacted] went outside to check on the vehicle. While outside, [redacted] heard Henderson say “It’s just Pancho”, a nickname for Francisco Enriquez [redacted] walked back to the front door of the residence, but realized he was locked out as he attempted to make entry. While knocking on the front door to be let in, [redacted] heard Henderson tell Enriquez that if he broke the window of his car he would call police [redacted] stated he then realized that Enriquez had exited the vehicle and was now on the walkway leading to the residence. Henderson and Enriquez began to “scuffle”. [redacted] then heard a single gunshot followed by seeing Henderson lying on the ground clutching his chest. [redacted] then watched as Enriquez, armed with a gun, pointed the gun at [redacted] and shot at him. [redacted] stated he believed the shot was intended to hit his legs, but instead hit the glass front door of the residence. As [redacted] continued trying to make entry into the house, he heard Enriquez tell [redacted] that he was going to kill him. [redacted] pleaded with Enriquez to leave, which caused Enriquez to run toward the back of the house temporarily. Enriquez returned to the front of

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the house, shouting and flailing his arms. Enriquez fired another shot, but the gun was not pointed toward anyone when the shot was fired. ■ was able to convince Enriquez to leave the scene prior to the arrival of police. Detectives presented ■ with a Department of Revenue photograph of Francisco Enriquez W/M 01-07-1971. JD confirmed the photograph to be of Enriquez, the same man he'd referred to as "Pancho" during the interview.

Detectives contacted witness ■ who stated she is a resident of 3611 Jefferson St., girlfriend of Henderson and cousin of Enriquez. ■ stated Enriquez's girlfriend had recently been kicked out of the residence by Henderson, who is the girl's father. Shortly before the shooting, ■ and Enriquez had been yelling at each other from their bedrooms. As the arguing continued, Enriquez walked into the hallway, pointed at her and said "and you bitch, I'm going to fuck you up". ■ tried to calm Enriquez, but Enriquez began blaming her for his girlfriend being kicked out. When Henderson heard Enriquez threaten ■ Henderson told Enriquez he had to leave the house. Enriquez left, but tried to re-enter and was locked out due to the front door locking automatically when closed. Minutes later, she and Henderson observed through their security cameras someone breaking into their Ford Explorer parked in the driveway. ■ and Henderson told ■ what was happening and the three of them went outside. Henderson approached the vehicle as she stood nearby and ■ stood on the front porch. Henderson communicated that it was Enriquez inside the vehicle. Relieved, she and Henderson started back toward the house. As they walked away, Enriquez exited the vehicle and confronted Henderson by the front steps leading to the porch. Enriquez told Henderson, "pussy, I'll fuck you up", to which Henderson replied "let's do this then". Enriquez then produced a silver handgun and shot Henderson, causing him to stumble and fall near the front door of the residence. Enriquez then fired a shot at ■ leading to a "tussle" between Enriquez and ■. ■ tried to enter the house but could not as the front door was locked. ■ and Enriquez continued fighting, causing her to be pinned behind the front porch door. While ■ and Enriquez were fighting, she heard Enriquez say "Where's my cousin, I'm killing that bitch". ■ saw Enriquez produce a second gun, black in color, and threaten to shoot police if they responded to the location. Upon hearing police sirens, Enriquez jumped from the porch and ran east. Detectives presented ■ with a Department of Revenue photograph of Francisco Enriquez W/M 01-07-1971. ■ confirmed the photograph to be of the same Francisco Enriquez she'd been referring to during the interview.

Detectives contacted the homeowner, ■, who stated he lives at the 3611 Jefferson St. with ■, his step-son Henderson, and ■, Henderson's ■. ■ stated he fell asleep watching television inside his 1st floor bedroom on 12-14-2022 at approximately 0100 hours. Approximately 15 minutes later, he was awakened by the sound of barking dogs. As he went to see what the dogs were barking at, he overheard ■ arguing with someone at the front door, following by loud knocking and glass shattering. ■ did not immediately go the front door, as he was trying to keep his dogs inside, but when he did go to the front he observed EMS performing CPR on a person on the ground he would later discover was Henderson.

Detectives contacted the calling party ■, who stated that on 12-14-2022 at approximately 0100 hours, he heard two men fighting down the street, pointing toward 3611 Jefferson St. EL stated he heard one of the men yell "please don't kill me". ■ went inside his house and called police. While inside, ■ stated he believes he heard a gunshot.

Detectives contacted ■ who described herself as a friend of ■ and was allowed to stay at the residence the past couple of days. ■ stated she was asleep in an upstairs bedroom of the house when she heard the sound of two men arguing followed by two gunshots. ■ remained in the bedroom until she was escorted out by police.

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At 3611 Jefferson St., detectives located three spent casings head stamped with S&B 6.35 at the scene, with one being near the walkway leading to the front porch where Henderson was found, and two on the front porch near Henderson. An exterior surveillance camera was observed affixed to the front of the residence which appeared to be directed toward to front porch and front yard. In a bedroom of the residence, the DVR system connected to the exterior camera was located. The camera was determined to capture footage of the homicide, which showed, in conjunction with the statements provided by witnesses, [REDACTED], and Henderson all exiting 3611 Jefferson St. Henderson approaches an SUV parked in the driveway of the residence. Enriquez exits the vehicle and walks toward the front porch, where Henderson is. Henderson kicks Enriquez in the stomach area as Enriquez approaches him. Henderson puts his fists up in a "boxing" stance. Enriquez produces a handgun and shoots Henderson, causing Henderson to clutch his chest and fall. Enriquez fires a second shot toward the house or general direction where Henderson falls. Although the exact location where Henderson falls is obscured from camera view, Enriquez kicks and uses his handgun to strike in an area reasonable for Henderson to have fallen. Enriquez and [REDACTED] wrestle on the front porch, and eventually Enriquez leaves before the arrival of police.

During the course of this investigation, detectives obtained a Trap and Trace warrant for the cell phone number associated to Enriquez. The Kansas City Police Department's Career Criminal Unit has attempted to locate Enriquez using the data obtained with the warrant, however, those attempts have been unsuccessful as of this date.

Printed Name Det. Jonathan Cook #5572 Signature /s/ Det. Jonathan Cook #5572

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

Judge

Circuit Court of _____ County, State of Missouri.