

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

Police# 16-082424
Prosecutor# 095436095
1616-CR
OCN# AN014653

COMPLAINT

STATE OF MISSOURI

vs.

**Travon M. Williams
2708 S. Westport Road
Independence, MO 64052
DOB: 07/04/1995; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 October 30, 2016, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Tusigaigon Tu caused the death of Jacobson Laumoli 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.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

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 October 30, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count 1, 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 facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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.

THE STATE OF MISSOURI

vs.

Travon M. Williams

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
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Independence, Missouri 64050
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WITNESSES:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
PO Robert Brady , 223 N. Memorial Drive, Independence, MO 64050
DET Steven Breshears , 223 N. Memorial Drive, Independence, MO 64050
PO Frank Bunney , 223 N. Memorial Drive, Independence, MO 64050
DET Christopher Burris , 223 N. Memorial Drive, Independence, MO 64050
PO Joshua Canterbury , 223 N. Memorial Drive, Independence, MO 64050
[REDACTED]
DET Jason Clancy , 223 N. Memorial Drive, Independence, MO 64050
DET Stephen Cook , 223 N. Memorial Drive, Independence, MO 64050
PO Chad Cox , 223 N. Memorial Drive, Independence, MO 64050
[REDACTED]
[REDACTED]
PO Joseph Farnsworth , 223 N. Memorial Drive, Independence, MO 64050
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
SGT John Howe , 223 N. Memorial Drive, Independence, MO 64050
PO Amanda Huffman , 223 N. Memorial Drive, Independence, MO 64050
[REDACTED]
[REDACTED]
[REDACTED]
DET Emily Knox , 223 N. Memorial Drive, Independence, MO 64050
PO Roger Lane , 223 N. Memorial Drive, Independence, MO 64050
[REDACTED]
[REDACTED]

PROBABLE CAUSE STATEMENT

Date: 11/7/2016

Report #: 2016-82424

I, Brice Minter, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 10/30/2016, at approximately 0155 hours, **TRAVON M. WILLIAMS**, (Race- African American, Sex- Male, DOB- 07/04/1995, Address- 2708 S. Westport Road, Independence, Missouri 64052, SSN- [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

TRAVON M. WILLIAMS and or referred to hereafter as the **DEFENDANT** committed the act of Murder; 2nd Degree and Armed Criminal Action by knowingly causing the death of **JACOBSEN L. LAUMOLI** by shooting him one time in the back with a Springfield XD .40 caliber semi-automatic handgun. The following are the supporting facts to the case:

On 10/30/2016 at approximately 0155 hours, Independence Police Officer(s) responded to the 20000 block E.12th Terrace South, Independence, Jackson County, Missouri regarding a reported aggravated assault/shooting.

Upon arrival, it was determined that the victim identified as Jacobsen L. Laumoli was located lying in the street and had suffered a gunshot wound and was pronounced deceased by an American Medical Response Ambulance paramedic/EMT.

During the course of the investigation, detectives conducted numerous witness interviews as the following information was conveyed:

Two identified residences located at 20100 E. 12th Terrace South and 20105 E. 12th Terrace South were having separate residential parties as numerous friends/families were attending each respective party. The investigation revealed that [REDACTED] was the owner of 20100 E. 12th Terrace South and [REDACTED] was his roommate. Several witnesses from 20100 E. 12th Terrace South advised that they heard some type of verbal disturbance coming from the front porch of the residence (20100 E. 12th Terrace South).

Witnesses advised that they observed either a Samoan or Asian male with no shirt and a ponytail throw a wooden 2x4 at the residence of 20100 E. 12th Terrace South while striking the porch railing and then approach on foot. The unknown male then began to physically assault [REDACTED] by repeatedly striking him in the head while located on the front porch/front yard.

This subject was later identified as [REDACTED], Samoan male. Witnesses observed a second unknown Samoan male also approach the residence of 20100 E. 12th Terrace South. This subject was later identified as Jacobsen **LAUMOLI**, Samoan male. Witnesses then observed an unknown African American male known only as "Trace" fire approximately (2) rounds from the doorway of the residence at 20100 E. 12th Terrace South. After the incident, subjects from the party began to depart from the residence as several were approached by the unknown African

male and or "Trace" as he attempted to hand them the firearm while requesting them to "bury the gun", ditch it, get rid of it or do something with it".

On 10/30/2016, Detective Kurt Wyckoff conducted a witness interview with [REDACTED]. He stated that the mother of his children, [REDACTED] who resides at 20105 E. 12 Terrace South, was hosting a Halloween party at the residence with his sister [REDACTED] and her boyfriend Jacobson Laumoli and or the victim.

[REDACTED] stated that he did not want to drive home due to his intoxication level, so at approximately 0100 hours he began to walk home. He stated that he was wearing a "Lava Lava", a Samoan skirt for men. He advised that as he walking down the street, he observed (4) Caucasian males and (1) African American male on the porch near the front door of a residence later identified as (20100 E. 12th Terrace South). He stated that one of the subjects' stated "What kind of costume are you wearing fag". [REDACTED] stated that the other males joined in and were laughing at him as he heard another subject state "Look at his Fag".

[REDACTED] stated that he walked towards the subjects and picked up a board that was on the street and stated "What do you guys want to do?" as he approached the house. [REDACTED] stated that all (5) subjects were outside as he was prepared to fight all of them by himself. He stated that he walked up the hill towards the front door and threw the board at the house, striking the house.

[REDACTED] stated that the subject that initially was yelling at him was then standing next to him as he punched the subject, knocking him to the ground. He further indicated that (2) other Caucasian males then came down the hill and he fought with them. [REDACTED] stated that as they were coming towards him, he observed a Caucasian male and an African American male enter into the residence.

[REDACTED] stated he was fighting the (2) subjects when he was grabbed from behind by Jacobson Laumoli as he heard one gunshot. He stated that as Laumoli pulled him from behind he twisted his knee and fell to the ground as he heard (2) more gunshots and then observed Laumoli on the ground, apparently shot. [REDACTED] further indicated that he observed an African American male holding a handgun and assumed he was the person that shot Laumoli.

On 10/30/2016, Detective Minter conducted a witness interview with [REDACTED] as he indicated the following information: He advised that he was hosting a gathering at his residence (located at 20100 E. 12th Terrace South) with a group of approximately (15-20) close friends from William Chrisman High School. He further advised that he observed his roommate and or [REDACTED] standing on the front porch. [REDACTED] observed (2) unknown Samoan males walking while one was carrying several wooden 2x4 boards. [REDACTED] heard some type of unknown verbiage exchanged between [REDACTED] and the Samoan male carrying the boards and assumed that they were words that provoked him because the unknown Samoan male began entering onto the property of 20100 E. 12th Terrace South.

[REDACTED] further indicated that he was fearful for his safety as he proceeded to his bedroom and retrieved his Springfield XD .40 caliber handgun. He then walked back to the living room area of his residence and as he turned the corner, he observed the unknown Samoan male assaulting [REDACTED] while being struck numerous times on the side of his face. [REDACTED]

indicated that several people were standing in front of the door as he requested that they open the door in order for him to assist [REDACTED]. It should be noted that that main door was open as the storm door was closed.

[REDACTED] advised that as he made it about halfway towards the front door, he observed [REDACTED] being struck several more times by the unknown Samoan male as the storm door slammed shut. [REDACTED] further advised that he was fearful that the Samoan male was going to push [REDACTED] over the porch railing. At this time, an unknown African American male or referred to as "Trace", who had accompanied [REDACTED] to the residence, stated to [REDACTED] to give him the gun as he grabbed the item. "Trace" then reached through the storm door as the center glass was missing and fired (2) rounds. After the incident, "Trace" then turned to [REDACTED] and attempted to hand him the handgun and stated to "ditch it, get rid of it or do something with it" as [REDACTED] refused to take the weapon from him. He further stated that he never observed "Trace" after the incident and did not know what door he had exited from or what he had done with the handgun.

It was further established during the course of the interview that [REDACTED] has known [REDACTED] for approximately (10) years and they attended William Chrisman High School. [REDACTED] further described "Trace" as being approximately 5'10"-6'01", 180-200 lbs., mid 20's, short black hair while wearing a white t-shirt with unknown pants. [REDACTED] could not provide any physical description pertaining to the unknown Samoan who had assaulted [REDACTED] other than he was possibly wearing a gray or white t-shirt.

On 10/30/2016, Detective KD Jarnagin conducted a witness interview with [REDACTED]. During the course of the interview, he stated that he was invited to a party by [REDACTED] and [REDACTED] while located at 20100 E. 12th Terrace South. Prior to arriving to the party, [REDACTED] arrived to a BP convenience store during the late evening hours on 10/29/2016 and ran into a neighborhood friend known only to him as "Trace."

[REDACTED] then invited "Trace" to the party as they later arrived during the early morning hours on 10/30/2016. Upon arrival, [REDACTED] eventually observed [REDACTED] go out the front door of the residence and heard others from the party advising there was a Samoan male walking down the road with several wooden 2x4 boards while wearing a skirt and no shirt. [REDACTED] stated [REDACTED] contacted the Samoan male and asked him if he was alright as the male dropped all but one 2x4 and approached the residence. [REDACTED] observed the Samoan male throw the 2x4 towards the house striking the metal hand railing as he approached [REDACTED] and began striking him with his fist.

[REDACTED] further indicated that as the Samoan male was assaulting [REDACTED], he (Samoan male) was able to hold the front door shut so that others from the party could not exit. He further stated that he never made it outside but observed a silver unknown make/model vehicle arrive as another Samoan male wearing a black hat exited from the vehicle as both Samoan males began assaulting [REDACTED]. [REDACTED] further indicated that eventually both Samoan males disengaged as [REDACTED] retreated back inside the residence. He further stated that the Samoan male wearing the black hat was shot but eluded that he did not observe the person who had shot him but confirmed that the shots came from the front room of the residence (20100 E. 12th Terrace South). [REDACTED] further described "Trace" as a dark skinned African American male, approximately (22) years of age with short hair while wearing a white shirt and white shorts.

On 10/30/2016, Detective Minter received a "Provisional Anatomic Diagnosis" from the Jackson County Medical Examiner's Office pertaining to the victim; Jacobsen Laumoli. The report was completed by Chief Medical Examiner Diane Peterson, M.D. as it concluded that the victim suffered one gunshot wound that entered into the left lateral mid thoracic aspect of the back and exited through the right upper portion of the chest. The cause of death was determined to be "injury to the heart and lungs due to a gunshot wound of the back" and the manner was ruled as a "homicide".

On 10/31/2016, Detective Robert Brady and Crime Scene Investigator K. Walje arrived to the BP convenience store located at 3500 S. Prospect Ave, Kansas City, Missouri and obtained video surveillance footage prior to the reported incident. Still images were captured from the video surveillance depicting an African American male believed to be the suspect in the Independence homicide. These images were emailed to Detective Justin English, who is assigned to the Independence Police Department (IPD) Career Criminal Unit (CCU). In turn, Detective English was asked to share the images with other members of the CCU Task Force in order to attempt to identify the suspect.

On 11-01-16, the still images captured from the BP surveillance video were provided to two witnesses. Both witnesses identified the male depicted as being the same subject they had seen at the party at 20100 E. 12th Terrace South. One of the witnesses had left prior to the shooting, but the other witness, Timothy Humphries, had witnessed the shooting and identified the subject depicted in the picture as being the suspect shooter.

On 11-01-16, Detective English relayed information to Detective Sgt. Howe that he had received information from KCPD Detective Brad Bailey, who indicated that he believed the suspect to be Travon Williams, B/M, DOB 07-04-1995 and or the **DEFENDANT**. In an email, Detective Bailey outlined that he had come across a party armed call from August 2016 (KCPD 2016-62614), where Williams was listed as the suspect. In the email Detective Bailey stated, "Looking at a booking photo of Williams, I believe he is the suspect in the video surveillance."

Detective Sgt. Howe conducted a computer inquiry on the **DEFENDANT** through the IPD computer system and located a booking photo dated from 10-22-2015. Upon visualization of the mugshot, Detective Sgt. Howe immediately recognized the mugshot to be the same subject as the **DEFENDANT** while depicted from the BP convenience store video surveillance footage.

Between 11/01/2016-11/02/2016, Independence Police detectives contacted numerous witnesses who attended the party located at 20100 E. 12th Terrace South as they were separately provided with a photo array of a possible suspect. Several witnesses were able to identify the **DEFENDANT** as being at the residential party while accompanied by [REDACTED] and or being the suspect who had fired the weapon from the residence.

On 11/01/2016, Detective Minter issued a Person of Interest Order issued for Travon M. Williams, B/M, DOB 07/04/1995 based on corroborating witness interviews and presented photo arrays during the course of the investigation. The PIO was issued by the Criminal Investigations Unit Administrative Specialist and entered into the REJIS computer system.

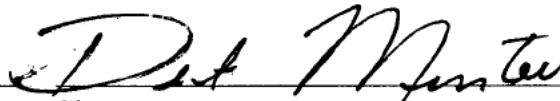
On 11/07/2016, the **DEFENDANT** was arrested by officers with the Kansas City, Missouri Police department while located in the area of 27th Street and Prospect based on the Person of Interest Order issued for homicide.

On 11/07/2016, Detective(s) Brice Minter and Doug Miller conducted a recorded interview with the **DEFENDANT** after reading him the Miranda Warning of Rights as he agreed to provide a statement without the presence of an attorney. During the course of the interview, he was asked if he was aware of the circumstances as to why he was currently in custody as he acknowledged that he was. He was asked why he didn't turn himself into the police as he indicated that he has to work to make money just like the police need to work to make their money. He was further advised that the reason why detectives wanted to speak to him was regarding a shooting that occurred on E. 12th Terrace South during a party.

The **DEFENDANT** advised that he did not attend a party as Detective Minter advised him that his friend, [REDACTED] was questioned and advised that he had transported him to the party. The **DEFENDANT** further stated that he did not attend the party and that anyone could say that he was there. As the interviewed continued, the **DEFENDANT** requested the presence of an attorney as the interview was terminated.

Detective Brice Minter

Print Name


Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge