

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

POLICE NO. :	16-085962
PROSECUTOR NO. :	095438497

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
WILLIAM M. ENLOE)	
6907 Bekkefibtaube Ave.,)	CASE NO. 1716-CR
Kansas City, MO - 64134)	DIVISION
DOB: 09/28/1996)	
Race/Sex: B/M;)	
SSN: ██████████)	
)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

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 on or about November 15, 2016, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, knowingly or with the purpose of causing serious physical injury to Antonio M. Williams Jr., caused the death of Antonio M. Williams Jr. 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 (571.015-001Y19755213.0)

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 **571.015**, RSMo, in that on or about November 15, 2016, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, committed the

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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 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. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y19841304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the class A felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about November 15, 2016, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, knowingly caused serious physical injury to [REDACTED] by shooting [REDACTED]

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 IV. 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,

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committed the felony of armed criminal action, punishable upon conviction under Section **571.015**, RSMo, in that on or about November 15, 2016, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, committed the felony of assault in the first degree charged in Count 2, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first 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.

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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St. Floor 7M
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WITNESSES:

PO Brandon J. Bray , 5301 E. 27th St., Kansas City, MO - 64128

DET Scott M. Emery , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

DET Scott P. Mullen , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

DET Hobart D. Price , 1125 Locust, Kansas City, MO - 64106

DET Brent R. Taney , 1125 Locust, Kansas City, MO - 64106

DET Daniel G. Thomas , 1125 Locust, Kansas City, MO - 64106

Antonio M. Williams Jr., Prosecuting Atty. Office, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03/16/2017

CRN: 16085962

I, Detective Danny Thomas #4933
(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 11/15/2016, at 5501 E. Bannister Road in
(Date) (Address)

Kansas City, Jackson Missouri William M. Enloe
(County) (Name of Offender(s))

black male, 09/28/1996 committed one or more criminal offense(s).
(Description of Identity)

Murder / ACA (2) / Aggravated Assault

The facts supporting this belief are as follows:

On 11/15/2016 at approximately 0053 hours, Officers of the Kansas City, Missouri Police Department were dispatched to Bannister Road and Drury Avenue in regard to an outside disturbance with a weapon. While enroute the dispatcher provided an update to the call, stating a party was shot at 5400 E. 96th Place, Shadow Creek Apartments, just south of Bannister Road and Drury Avenue.

Upon arrival contact was made with a victim (victim #1) who had been shot. Victim #1 advised the shooting occurred at the Phillips 66 located at 5501 E. Bannister Road. He further advised he and his friend (deceased victim #2) were riding in a maroon Mercedes Benz when the shooting occurred. Officers located the vehicle in the area, with victim #2 in the driver seat. The vehicle appeared to have been involved in an accident and victim #2 appeared to have been shot. Victim #1 and victim #2 were both transported to an area hospital for treatment. Victim #2's death was ruled a homicide.

Victim #1 was formally interviewed and stated he and victim #2 were meeting some guys at the gas station to exchange a key which was left in his vehicle earlier in the day and to buy some marijuana. He stated when they arrived at the gas station, he observed two people, one wearing a red sweat shirt, walking out of the gas station toward their car. He stated he observed victim #2 hand over the key to one of the individuals. He stated victim #2 had a gun in his lap. He then heard one of the suspects say, "You bitch ass nigga, come up off it" and he reached for the gun. Victim #2 pulled the gun out of the suspect's reach and the suspect(s) began shooting at them. An "Uzi" style firearm was found between the front passenger's seat and the console of the victim's vehicle. No shell casings were recovered from inside the victim's vehicle.

During the course of the investigation surveillance video was obtained from the business at 5501 E. Bannister. The video depicts an individual wearing a red hooded sweatshirt enter the store and attempt to purchase some items. He leaves the store without the items, which remained on the counter. After leaving the store he becomes involved in the shooting. The items on the counter were subsequently processed for evidence. One of the items had a fingerprint of value which showed to be that of William Enloe.

PROBABLE CAUSE STATEMENT FORM

CRN 16085962

During the course of the investigation, records of text messages between Enloe and Victim #2 reveal a discussion of trading a "G22" firearm for an "Uzi" firearm. Enloe made a request by text to make the trade prior to the shooting and the victim declined to make the transaction.

On 03/15/2017 Enloe was arrested and transported to Police Headquarters for questioning. During questioning Enloe stated he was at the store with some friends. He stated he entered the store and attempted to buy some items, however he left his money in the car. He exited the store and observed his friend talking to somebody in a car. He stated he saw his friend back up, followed by some gunshots. Enloe stated he started shooting a .22 caliber semi-automatic handgun in the air. Enloe stated he has been on the run since this occurred.

It should be noted there were no .22 caliber shell casings recovered at the scene.

Printed Name Detective Danny Thomas #4933 Signature /s/Detective Danny Thomas #4933

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

Judge

Circuit Court of _____ County, State of Missouri.