

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

POLICE NO. :	17-063867
PROSECUTOR NO. :	095440806

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
ERIC H WOMACK)	
,)	CASE NO. 1716-CR
, -)	DIVISION
DOB: 12/13/1986)	
Race/Sex: W/M;)	
SSN: XXXXX)	
)	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 July 21, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Anthony Clark by shooting him.

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 571.015.1, RSMo, in that on or about July 21, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, 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

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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/ Christopher Accurso
Christopher Accurso (#66899)
Assistant Prosecuting Attorney
415 E. 12th St. 11th Floor
Kansas City, MO - 64106
CAccurso@jacksongov.org

WITNESSES:

[REDACTED]

PO David Barbour, 1125 Locust, Kansas City, MO - 64106

DET Alane Booth, 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

[REDACTED]

DET Donna Drake, 5301 E. 27th Street, Kansas City, MO - 64127

DET Kristofer Oldham, 1125 Locust, Kansas City, MO - 64106

DET Darin Penrod, 1125 Locust, Kansas City, MO - 64106

[REDACTED]

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[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 08-13-2017

CRN: 17-63867



I, Detective Donna Drake #5573, Kansas City Missouri Police Department, Homicide Unit
(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 07-21-2017, at 5700 Independence Ave in
(Date) (Address)

Kansas City, Jackson Missouri Eric H. Womack
(County) (Name of Offender(s))

W/M, DOB: 12-13-1986, SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 07-21-2017 at approximately 1826 hours, members of the Kansas City Missouri Police Department were dispatched to the area of Independence Ave. and Lawndale Ave in regard to sounds of gunshots. Upon arrival, officers discovered a white male inside a vehicle with apparent gunshot wounds within a bay of the car wash located at 5700 Independence Ave. The Victim was pronounced deceased at the scene. The death is being investigated as a homicide.

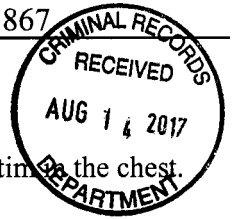
Detectives conducted an area canvas and determined a local business may have had surveillance cameras on the exterior of the building that would have captured details related to the homicide. Detectives obtained a consent to search and collected the video with the assistance of the KCPD Forensic Laboratory. The video collected was reviewed by detectives which revealed a vehicle similar to the victim's vehicle driven by what appeared to be a white female driver. The vehicle was observed entering a car wash stall located to the west of the business and was never observed leaving the location.

On 07-25-2017 detectives were contacted by law enforcement officials from the Spring Hill Kansas Police Department. Detectives were informed by Spring Hill Police that an individual had contacted them with information in regard to the homicide of the victim. The individual was subsequently contacted and interviewed by detectives. The aforementioned individual supplied the identity of the female driver who was believed to be with the victim at the time of the homicide. Additionally, the individual provided the name of the individual believed to have shot and killed the victim as Eric Womack w/m, 12-13-1986.

On 07-26-2017 detectives were once again contacted by the Spring Hill Kansas Police Department in regard to the homicide of the victim. Spring Hill Officers stated they had been contacted by a witness who wanted to provide information to law enforcement about the homicide of the victim. On 07-27-2017 detectives contacted and interviewed the witness at the Spring Hill Police Department. The aforementioned witness stated that on 07-23-2017 he heard Eric Womack w/m 12-13-1986 confess to killing the victim. The aforementioned individual stated that Womack said that he, the female driver whom he also identified to detectives along with the victim were in Kansas City, Missouri to buy "dope". The aforementioned witness

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stated Womack said the victim was "grabbing on" the female driver and Womack shot the victim in the chest. This individual was shown a picture of Womack whom he identified.

On 08-09-2017 detectives were contacted by law enforcement officials from Osawatomie, Kansas Police Department, who stated an individual had contacted them with information in regard to the homicide investigation. This individual was subsequently interviewed by detectives. The aforementioned individual stated Eric Womack confessed to killing a man at a car wash in Kansas City, Missouri and produced a news article covering the homicide at 5700 Independence Ave. Womack told the individual that he and a female had planned to rob the victim. Womack told the individual that he shot the victim in the chest because he had grabbed the female. Womack stated he had "left the scene dirty" by leaving spent shell casings at the scene. Womack told the aforementioned individual the police were going to be after him. This individual was shown a picture of Womack whom he identified.

On 08/12/2017, detectives made contact with the individual identified in previous interviews as having been with the victim at the time of his homicide. The witness told detectives that she spent the majority of the day with the victim the day of the homicide. The witness stated that she, Womack and the victim were headed to Kansas City to purchase narcotics. The witness stated that prior to their arrival to Kansas City, Womack told her he planned to rob the victim. The witness stated that she, Womack and the victim were together in the victim's vehicle at the car wash located at 5700 Independence Ave. The witness stated Womack shot the victim during an argument over the drug transaction. The witness stated she observed Womack produce a black in color handgun and shoot the victim. The witness stated she heard two gun shots. The witness stated that she and Womack fled the area on foot. The witness stated she observed Womack disassemble the handgun and discard the weapon while they were fleeing the area, however, she was unable to provide an exact location. The witness positively identified a single photograph of Womack as the individual she observed shoot and kill the victim.

On 08-12-2017 at 1710 hours, Womack was arrested in connection with the homicide of the victim. Womack was transported to police headquarters and escorted to the 7th floor and placed in interview room #4. Womack was advised of his Miranda Rights which he invoked and the interview was terminated. Womack was transported to the Jackson County Correctional Facility without incident.

Printed Name Det. Donna Drake #5573 Signature Det. Donna Drake #5573

The Court finds probable cause and directs the issuance of a warrant this 13 day of AUGUST, 2017

JACK GORNE
Judge JACK GORNE

Circuit Court of JACKSON County, State of Missouri.