

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

POLICE NO. :	17-072777
PROSECUTOR NO. :	095441121

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
AHMAD R HERRING)	
8301 E 105th Street,)	CASE NO. 1716-CR
Kansas City, MO - 64134)	DIVISION
DOB: 04/24/1990)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
)	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 August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with othres, with the purpose of causing serious physical injury to Robert E. Exford Jr, caused the death of Robert E. Exford 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 571.015.1, RSMo, in that on or about August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, 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

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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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, acting alone or purposefully in concert with others, in violation of 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 August 20, 2017, in the area of 33rd St and Wabash, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, knowingly discharged a firearm from a black Ford Edge, a motor vehicle.

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 (571.015-001Y19755213.0)

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 August 20, 2017, in the County of Jackson, State of Missouri, the defendant acting alone or purposefully in concert with others, committed the felony of unlawful use of weapons charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony

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of unlawful use of weapons 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

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WITNESSES:

DET Leland W. Blank , 1125 Locust, Kansas City, MO - 64106

Robert E. Exford Jr, Prosecuting Atty. Office, Kansas City, MO - 64106

DET Wayne C. Fitzner , 1125 Locust, Kansas City, MO - 64106

PO Justin Kirmse , 1125 Locust, Kansas City, MO - 64106

DET Ray H. Lenoir , 1125 Locust, Kansas City, MO - 64106

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

PROBABLE CAUSE STATEMENT FORM

Date: 8-31-2017

CRN: 17-072777

I, Det. Wayne Fitzner 3685
(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 8-20-2017, at 3238 Wabash in
(Date) (Address)

Kansas City, Jackson Missouri Ahmad R. Herring
(County) (Name of Offender(s))

B/M, 4-24-1990 SSN# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:
On 8-20-2017 at 0045 hours Kansas City Missouri Police Officers were dispatched to 3238 Wabash in regard to a shooting. While en route to the call, dispatch advised there was a black male shot inside of a black Chevrolet Tahoe. Upon arrival the officers found Robert E. Exford, BM, 8-10-1976 deceased inside his vehicle. The Jackson County Medical Examiner stated Exford's death was a homicide due to a gunshot wound.

During the crime scene investigation eighteen 7.62 caliber shell casings were found spread from east to west at the intersection of 33rd and Wabash. A search of the city surveillance cameras in the area found a black Ford Edge Missouri license plate ML1V5F 2019 driving in the area at the time of the homicide. Further footage of the vehicle at 0038 hours, on 8-20-2017 showed it traveling from east to west on 33rd street, as it approached the intersection of 33rd and Wabash the driver who was wearing what appeared to be a white T-Shirt climbed out of the driver's side window and fired numerous times from an apparent rifle in the direction of the victim's vehicle.

The license plate's DOR came back to a black 2017 Ford Edge rented from Budget Rental. A check with Avis/Budget security showed that the vehicle was obtained at the Budget Rental office located at 618 E. 99th street in Kansas City, Missouri. The manager of the Budget Rental Office told me the person who rented the vehicle was [REDACTED] and gave me her contact phone number. I called Ms. [REDACTED] and explained to her that I was investigating a crime and asked who had been driving the Ford Edge on the night of August 20th. She got back to me and told me that [REDACTED] Ahmad Herring had been driving the vehicle and gave me his phone number. I called Herring who told me that he had been driving the car on that evening during that time frame and that he had been accompanied by a person named "D".

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On August 22nd, 2017 at about 1755 hours, the Ford Edge was found at the Budget Rental Office 618 E. 99th Street. During processing of the vehicle a single 7.62 shell casing was found inside the vehicle.

Herring was arrested on an investigative hold on 8-31-2017 and questioned by detectives. After being read his Miranda Rights Herring said he would answer our questions without an attorney being present. After being told we were investigating a shooting he was asked again about that night. He said that around 11:00 PM he had been sitting in front of his biological father's house at 3619 Chestnut smoking K-2 when "D" came by and asked if he had any to sell, he didn't but offered to let him smoke some. Once "D" got into the car they started driving around the area then around 12:45 AM or 1:00 AM "D" wanted to be taken south to 94th and Hillcrest. Once he dropped him off he went home to his mother's house for the night. He said that no one else was driving the car that evening, that he would not let anybody else drive his mother's car. He also said no one else besides "D" and he had been in the car that evening.

Printed Name Det. Wayne Fitzner 3685 Signature /S/ Det. Wayne Fitzner 3685

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

Judge

Circuit Court of _____ County, State of Missouri.