

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

<b>POLICE NO. :</b>	19-3770
<b>PROSECUTOR NO. :</b>	095452564
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ROBERT R GRAHAM</b>	)	
<b>107 Nw Chipman Road</b>	)	<b>CASE NO. 1916-CR</b>
<b>Lees Summit, MO 64063</b>	)	<b>DIVISION</b>
<b>DOB: 09/30/1981</b>	)	
<b>Race/Sex: W/M</b>	)	
<b>[REDACTED]</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Assault 1st Degree Or Attempt (565.050-002Y19791304.0)**

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 B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about May 7, 2019, in the County of Jackson, State of Missouri, the defendant shot at the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

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 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 II. Armed Criminal Action (571.015-001Y19755212.0)**

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 May 7, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree by, with, and through, the knowing use, assistance and aid of a deadly weapon.

**State vs. Robert R Graham**

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 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/ Alison Schenkelberg*  
Alison Schenkelberg (#69325)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3582  
AESchenkelberg@jacksongov.org

**WITNESSES:**

1. [REDACTED]
2. [REDACTED]
3. DET Kevin Dibben, 10 NE Tudor, Lee's Summit, MO 64086
4. PO Casca Hunter, 10 NE Tudor, Lee's Summit, MO 64086
5. DET Aaron Ide, 10 NE Tudor, Lee's Summit, MO 64086
6. [REDACTED]
7. [REDACTED]
8. PO Stephen Owings, 10 NE Tudor, Lee's Summit, MO 64086
9. DET Michael Reese, 10 NE Tudor, Lee's Summit, MO 64086
10. [REDACTED]
11. [REDACTED]
12. PO Hunter Watson, 10 NE Tudor, Lee's Summit, MO 64086

# STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 1-19-3770

Date: May 8, 2019

I, Detective Kevin Dibben, a Detective with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 05/07/2019, at 107 NW Chipman Rd, Lee's Summit, Jackson County Missouri, Robert R. Graham, W/M, 09/30/1981, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 5/7/19, Officers with the Lee's Summit Police Department were dispatched to Lee's Summit Medical Center (2100 SE Blue Parkway) on a male with a gunshot wound to the foot. Dispatch advised the shooting occurred at a residence on the corner of Chipman Rd. and Olive St. The victim with the gunshot wound was identified as [REDACTED]. Officers arrived on scene and contacted [REDACTED], who told them the person who shot him was Robert Graham, a coworker of his. [REDACTED] was transported to Research Medical Center for advanced treatment.

Detective Treacy responded to Research Medical Center and contacted [REDACTED] in emergency room #3. [REDACTED] was laying in the hospital bed with bandages around his foot and blood dripping onto a pad. [REDACTED] said he was picked up at his residence in Lee's Summit by a second co-worker named [REDACTED]. He said [REDACTED] drove him to Robert's residence. [REDACTED] said he exited [REDACTED]'s vehicle by himself and knocked on the rear door to the residence. Robert did not answer, so [REDACTED] approached a window on the house and knocked there. After knocking on the window, [REDACTED] heard movement inside the residence, so he went back to the rear door. Robert opened the rear door and told [REDACTED] to come inside because he wanted to speak with him. [REDACTED] entered the residence and walked to the bedroom and heard Robert say "I heard you're talking a lot of shit to mother fuckers online." [REDACTED] took a seat on a subwoofer speaker box in the bedroom in the bedroom.

Robert left the room and re-entered approximately one minute later, pointing what appeared to be a "410 sawed off shotgun" at [REDACTED]. Robert was pointing the gun at "face level," so [REDACTED] reached up to move the barrel of the gun down. Robert then pointed the gun at [REDACTED]'s foot, pushed it close to his foot, then shot him in the foot. Robert put another round in the shotgun and said "I'll shoot you again, if you don't get out of my house and quit talking shit." [REDACTED] then ran out of the residence and attempted to enter [REDACTED]'s vehicle. [REDACTED], who was still inside his vehicle, backed up and left the area, leaving [REDACTED]. [REDACTED] walked southbound on Olive Street until he was picked up by an uninvolved older white female, who transported him to the hospital.

Officers were later able use Missouri Department of Revenue records identify Robert's residence as 107 NW Chipman Rd, Lee's Summit, Jackson County, Missouri. That residence sits on the corner of Chipman Rd. and Olive St.

Lee's Summit Police Department Detectives later served a valid Jackson County search warrant at 107 NW Chipman Rd. They located:

- A disassembled 410 shotgun. The barrel portion of the shotgun measured 7" from the face of the receiver to the end of the barrel. The receiver portion measured 9.5", including the grip. When assembled, the firearm measured 13".
- One spent Federal 410 shotgun shell

- Three live 410 shotgun shells

Robert was arrested as a Person of Interest for the case. Detective Reese conducting a recorded, Mirandized interview of Robert. Robert said he remembered [REDACTED] coming to his house earlier in the morning. He said the two went to Robert's bedroom and talked. When asked about the shooting, Robert declined to make further comments without an attorney present.

These events occurred in the city of Lee's Summit, Jackson County, Missouri.

Det. Kevin Dibben #0712  
**Print Name (Detective)**

/s/ Det. K. Dibben #0712  
**Signature (Detective)**