IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	19-038936
PROSECUTOR NO. :	095456356
OCN:	

STATE OF MISSOURI,   )
                                         PLAINTIFF,   )
vs.   )
)
RICHARD D SAETTONE II   )
109 N Glenwood   ) **CASE NO. 1916-CR**
Independence, MO 64052   ) **DIVISION**
DOB: 11/03/1980   )
Race/Sex: W/M   )
███████████████   )
                                         DEFENDANT.   )

AMENDED COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 September 27, 2019, in the County of Jackson, State of Missouri, Robert Shinneman was killed by being shot as a result of the perpetration of the class D felony of Burglary in the Second Degree under Section 569.170, RSMo committed by the defendant on or about September 27, 2019, in the County of Jackson, State of Missouri.

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. Burglary - 2nd Degree (569.170-001Y20172202.0)

State vs. Richard D Saettone III

        The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 27, 2019, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with another knowingly entered unlawfully in a building, located at 1220 S Scott Ave., Apt A, and possessed by ██████████, for the purpose of committing stealing therein.

        The range of punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars ($10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

        The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:
1. PO Kirsten Baker, 223 N. Memorial Drive, Independence, MO 64050
2. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
3. ██
4. Robert D. Shinneman, 211 W. Franklin St., Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 12/4/2019   Report #: 2019-73496

I, Christopher Burris, 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 9/22/2019, at approximately 0200 hours, Richard D. Saettone II, (Race- White, Sex- Male, DOB- 11/03/1980, Address-LKA 109 N. Glenwood Avenue, ███████████████ committed one or more criminal offenses in Jackson County, Missouri.

2.   The facts supporting this belief are as follows:

On 09/22/2019 at approximately 0200 hours, Richard D. Saettone participated in a drug related robbery at 1221 South Scott Avenue, Apartment A, Independence, Jackson County, Missouri 64050. During said robbery, a class A felony in the state of Missouri, Robert D. Shinneman, was fatally shot by the resident of the address.

Independence Police Officers responded to 1221 South Scott Avenue, Apartment A, Independence, Jackson County, Missouri 64050, in reference to a shooting. At 0300 hours, Independence Police dispatch received a 9-1-1 call from male who identified himself as ████████████, giving the aforementioned address and advised he shot at someone who kicked in his front door. ████████ advised he was not sure if person he shot at was hit or not, but the person was on the ground. ████████ advised incident occurred about 45 minutes prior to him calling. ████████ advised he left the scene because he was scared. ████████ advised he still had his gun with him and he would come to police headquarters later on 09/22/2019. ████████ told dispatchers that the person he shot pointed a gun at him. ████████ would not give his location and just kept telling dispatchers he would turn himself in tomorrow.

Upon the arrival of officers, they observed the front door to Apartment A to be damaged and unsecured. Officers entered the apartment and while clearing it, found a deceased male laying on the floor, later identified as Shinneman. Shinneman had on a ski mask and there was a firearm next to the his body. Officers reported that it appeared the male had been shot in the head. The scene was then cordoned off and held for investigators. A search warrant was applied for an obtained through the 16th Judicial Circuit of Jackson County, Missouri to search the scene for evidence and recover the deceased's body. The apartment door, the only door to the apartment had metal brackets on the inside, which appeared to be additional security measures to place a 2 x 4 between to fortify the door. Shinneman was wearing a dark balaclava mask, gloves on both hands and a Glock 36 .45 caliber firearm was recovered from near the deceased's feet.

On 09/27/2019, Detective Burris interviewed ████████ at Police Headquarters with his attorney Preston Cain, after being advised of his Miranda rights. ████████ told me that he was watching television and heard rattling to his windows, leading him to believe something or someone was going to come through it. ████████ told me that he grabbed a firearm and went to look at the window. ████████ told me that he pulled the drape back and announced "I've got a gun." ████████ said that he then heard "get down, get down" over his shoulder behind him. ████████ advised as he turned he observed a subject wearing a masking, holding what he thought to be a sub machine gun in the subject's right hand. ████████ advised he fired one shot. ████████ later told me that he was standing at the end of his bed, when he fired. ████████ said that the subject hit the ground. ████████ told me that he did not know if there was anyone with the subject. ████████ advised he gathered a few things from the apartment, got out of the apartment and called police.

On 10/04/2019, Detective Burris interviewed a confidential source "███." ███" identified Saettone as being involved in this case. ███" gave intimate details of the scene and circumstances, things that were not released publically, that were provided to the "███" by Saettone. "███" provided information that the apartment was the

source of drug trafficking and Shinneman and Saettone were going to rob the apartment. A stop order was issued for Saettone.

On 12/02/2019, Detective Burris interviewed Saettone after his arrest on a stop order he issued in reference to this case. After being advised of his Miranda rights, Saettone was interviewed. Saettone ultimately confessed to his involvement in the robbery and that the reason they were going to the apartment was a robbery for methamphetamine and cash. Saettone advised he knew since Shinneman was killed he was an "accessory" to murder. Saettone advised he was the lookout to make sure police did not show up. Saettone reported that Shinneman breached the door. Saettone stated that it took Shinneman too long to breach the door. Saettone indicated that it gave ▅▅▅▅ advance notice and if it didn't take so long, ▅▅▅▅would have been the one who likely ended up dead.

Detective Christopher Burris # 1401   /S/ Christopher Burris

_____   _____
Print Name   Signature