


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

POLICE NO. :	20-001873
PROSECUTOR NO. :	095459769
OCN:	CW006555

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MICHAEL RICHARDSON)	
9702 Wornall Rd.)	CASE NO. 2016-CR
Kansas City, MO 64134)	DIVISION
DOB: 12/22/2001)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. 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, 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 June 30, 2020, at 6255 Blue Ridge Blvd, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons.

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. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

State vs. Michael Richardson

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 June 30, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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 Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about June 30, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 9 mm Smith and Wesson handgun, a firearm, and on January 27, 2020, the defendant was convicted of the felony of Unlawful Use of a Weapon in the County of Jackson, State of Missouri.

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.

State vs. Michael Richardson

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

WITNESSES:

1. PO Robert Fox, 10000 E. 59th St., Raytown, MO 64133
2. [REDACTED]
MO 64106
3. PO Evan Hartenstein, 10000 E. 59th Street, Raytown, MO 64133
4. PO Joseph Holt, 10000 E. 59th Street, Raytown, MO 64133
5. PO Erica Hopper, 10000 E. 59th St., Raytown, MO 64133
6. PO Larry Jackson, 10000 E. 59th Street, Raytown, MO 64133
7. DET Brandon Jeffery, 10000 E. 59th Street, Kansas City, MO 64133
8. PO Brian Porch, 10000 E. 59th Street, Raytown, MO 64133
9. PO Trevor Shroyer, 10000 E. 59th St., Raytown, MO 64133
10. [REDACTED]
64106
11. PO Samantha Stoner, 1000 59th Street, Kansas City, MO 64133
12. PO Clint Wallace, 10000 E. 59th St., Raytown, MO 64133
13. [REDACTED]
64106
14. PO Joe Wise, 10000 E. 59th St., Raytown, MO 64133

Probable Cause Statement Form

Date: 7/1/2020

Report: 20-1873

I, Brandon Jeffery, 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 6/30/2020 at 6255 Blue Ridge Boulevard, Raytown, Missouri 64133, Michael F. Richardson, a black male born 12/22/2001, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 6/30/2020 at 2031 hours, Raytown Patrol Officers were dispatched to Discount Smokes and Convenience Store located at 6255 Blue Ridge Boulevard, Raytown, Missouri 64133 regarding shots fired. Upon arrival, Raytown Officers located a deceased 15 year old juvenile male, D.F. in the parking lot of the business. A second shooting victim, [REDACTED], was located at the Raytown Plaza Laundromat (6121 Blue Ridge Boulevard, Raytown, Missouri 64133) with an apparent gunshot wound to his left arm.

During the initial investigation, it was determined through surveillance video several subjects of interest were located inside a vacant structure labeled "6243" for the address numerics. Entry was made into the structure where seven (7) subjects were located inside. Upon review of video surveillance from Discount Smokes and Convenience Store, it was determined three (3) of the subjects located inside the vacant space appeared to have tampered with evidence on the scene prior to Raytown Police arrival. As a result, [REDACTED] [REDACTED] Michael F. Richardson and Sean J. Hill Jr. were arrested and placed on a 24-hour investigative hold.

On 7/1/2020 at 0956 hours, a recorded-interview was conducted with Michael F. Richardson. Michael F. Richardson was read his Miranda Rights, which he advised he understood and willingly waived to speak with me. During the interview, Michael F. Richardson admitted to being a felon in possession of a firearm, which was observed on video surveillance. Michael F. Richardson identified himself by circling and initialing still images of him in possession of a firearm, which was captured on surveillance video obtained from the Discount Smokes and Convenience Store. Michael F. Richardson also admitted that he discharged the firearm that he had in his possession, which he described to be a 9mm Smith and Wesson handgun with a chrome slide and black frame, at two (2) unidentified black males running northbound through the parking lot of Raytown Plaza. He advised he believed the two (2) unidentified males were involved in shooting [REDACTED]. Michael F. Richardson stated he gave the gun to "[REDACTED]", whom he described as a black male wearing a white top and blue shorts. He also advised Sean J. Hill Jr. along with [REDACTED] were also shooting at the two (2) unidentified black males in the parking lot after D.F. was shot. Furthermore, Michael F. Richardson stated he believed Sean J. Hill Jr. also had a handgun while [REDACTED]" had a "rifle".

A search warrant was obtained for the vacant business, referred to as the "studio" (6243 Blue Ridge Boulevard). Two (2) Glock 23, .40 caliber handguns, live ammunition and a Mini-Draco AK-47-style firearm were recovered during the search warrant.

Michael F. Richardson has the following criminal history:

- Tampering with Motor Vehicle/1st (2019), 1916CR0363901, 4 DOC (x5)
- Receiving Stolen Property (2019) , 1916CR0363901, 4 DOC

- Burglary/2nd (2019), 1916CR0363901, 4 DOC (x2)
- Stealing a Vehicle, 1916CR0363901, 4 DOC
- Stealing a Firearm (2019), 1916CR0363901, 4 DOC
- Unlawful Use of a Weapon (2019), 1916CR04110, 4 DOC
- Unlawful Use of a Weapon – Subs. 10, (2019), 1916CR0411001, 4 DOC (x2)

Name: Det. B. Jeffery #1837

Signature: /s/ Det. B. Jeffery #1837

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POLICE NO. :	20-001873
PROSECUTOR NO. :	095459770
OCN:	CW006554

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
SEAN J. HILL JR.)	
6325 E. 127th Street)	CASE NO. 2016-CR
Grandview, MO 64030)	DIVISION
DOB: 10/30/1998)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

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State vs. Sean J. Hill Jr.

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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 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.

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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

State vs. Sean J. Hill Jr.

AESchenkelberg@jacksongov.org

WITNESSES:

1. [REDACTED] E 12th St, Floor 11, Kansas City,
MO 64106
2. PO Evan Hartenstein, 10000 E. 59th Street, Raytown, MO 64133
3. PO Joseph Holt, 10000 E. 59th Street, Raytown, MO 64133
4. PO Erica Hopper, 10000 E. 59th St., Raytown, MO 64133
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The facts supporting this belief are as follows:

On 6/30/2020 at 2031 hours, Raytown Patrol Officers were dispatched to Discount Smokes and Convenience Store located at 6255 Blue Ridge Boulevard, Raytown, Missouri 64133 regarding shots fired. Upon arrival, Raytown Officers located a deceased 15 year old juvenile male, [REDACTED], in the parking lot of the business. A second shooting victim, [REDACTED], was located at the Raytown Plaza Laundromat (6121 Blue Ridge Boulevard, Raytown, Missouri 64133) with an apparent gunshot wound to his left arm.

During the initial investigation, it was determined through surveillance video several subjects of interest were located inside a vacant structure labeled "6243" for the address numerics. Entry was made into the structure where seven (7) subjects were located inside. Upon review of video surveillance from Discount Smokes and Convenience Store, it was determined three (3) of the subjects located inside the vacant space appeared to have tampered with evidence on the scene prior to Raytown Police arrival. As a result, [REDACTED], [REDACTED], Michael F. Richardson and Sean J. Hill Jr. were arrested and placed on a 24-hour investigative hold.

On 7/1/2020 at 0900 hours, a recorded-interview was conducted with Sean J. Hill Jr. Sean J. Hill Jr. was read his Miranda Rights, which he advised he understood and willingly waived to speak with Detectives. During the interview, Sean J. Hill Jr. never admitted to being in possession of a firearm and requested an attorney when the conversation was directed to the activity that occurred outside the studio storefront after [REDACTED] was shot, indicating gunfire. Prior to requesting an attorney, Sean J. Hill Jr. stated "we wasn't doing anything wrong, they was shooting at us" and then asked "don't ya'll shoot at motherfuckers when they shoot at yall? Ain't that how it's supposed to go?" The interview ended as a result of him requesting his attorney.

On 7/1/2020 at 0956 hours, a recorded-interview was conducted with Michael F. Richardson. Michael F. Richardson was read his Miranda Rights, which he advised he understood and willingly waived to speak with me. During the interview, Michael F. Richardson admitted to being a felon in possession of a firearm, which was observed on video surveillance. Michael F. Richardson identified himself by circling and initialing still images of him in possession of a firearm, which was captured on surveillance video obtained from the Discount Smokes and Convenience Store. Michael F. Richardson also admitted that he discharged the firearm that he had in his possession, which he described to be a 9mm Smith and Wesson handgun with a chrome slide and black frame, at two (2) unidentified black males running northbound through the parking lot of Raytown Plaza. He advised he believed the two (2) unidentified males were involved in shooting [REDACTED]. Michael F. Richardson stated he gave the gun to "[REDACTED]", whom he described as a black male wearing a white top and blue shorts. He also advised Sean J. Hill Jr. along with [REDACTED] were also shooting at the two (2) unidentified black males in the parking lot after [REDACTED] was shot. Furthermore, Michael F. Richardson stated he believed Sean J. Hill Jr. also had a handgun while [REDACTED] had a "rifle".

A search warrant was obtained for the vacant business, referred to as the “studio” (6243 Blue Ridge Boulevard). Two (2) Glock 23, .40 caliber handguns, live ammunition and a Mini-Draco AK-47-style firearm were recovered during the search warrant.

Sean J. Hill Jr. has the following criminal history:

- Receiving Stolen Property (2017), 1716CR01115, 4 Year Probation
- Possession of Controlled Substance (2017), 1816CR0087701, 4 Year Probation
-