

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

POLICE NO. :	KC21038104
PROSECUTOR NO. :	095464882
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
CHRISTOPHER L SPEARS	)	
4323 Linwood Blvd.	)	CASE NO. 2116-CR
Kansas City, MO 64128	)	DIVISION
DOB: 01/01/1988	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 June 13, 2021, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Andrea Dean caused the death of Andrea Dean by shooting her.

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 (571.015-001Y20205213.0)

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 June 13, 2021, in the County of Jackson, State of

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Missouri, the defendant committed the felony of murder in the second degree charged in Count One, 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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.

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/ Jeannette Wolpink

Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street

State vs. Christopher L Spears

11th Floor
Kansas City, MO 64106
(816) 881-1776
jwolpink@jacksongov.org

WITNESSES:

1. Andrea Dean, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED] 12th St, Floor 11, Kansas City, MO 64106
3. [REDACTED] St, Floor 11, Kansas City, MO 64106
4. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
5. DET Daniel W. Frazier, 1125 Locust, Kansas City, MO 64106
6. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106
9. [REDACTED]
64106
10. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
11. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06-13-2021

CRN: KC21038104

I, Detective Hobart Price #5254
(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 06-13-2021, at 4323 E. Linwood Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Christopher L. Spears
(County) (Name of Offender(s))

B/M 01-01-1988 committed one or more criminal offense(s).
(Description of Identity)

Murder
ACA

The facts supporting this belief are as follows:

On 06-13-2021 at 0954 hours, members of the Kansas City Missouri Police Department were dispatched to 4323 E. Linwood Blvd, Kansas City, Jackson County, Missouri on a shooting call.

Upon arrival Officers made contact with 3 juveniles at 4311 E. Linwood Blvd who stated they lived at 4323 E. Linwood. The juveniles stated their mom and dad got into an argument over a phone and then their dad shot their mom in the head and they ran out of the house and to the neighbor's house. They stated their dad's name is Christopher Spears and he was wearing a white tank top.

The Officers then entered 4323 E. Linwood where they found the victim in the southeast bedroom with an apparent gunshot injury to her head. The victim was pronounced deceased at the scene.

When the crime scene was processed, two spent 9mm shell casings were located in the bedroom where the victim was and a live 9mm round was also recovered near the bedroom. A purple Crown Royal bag was also located in the bedroom which contained a baggie with a white powder substance, a baggie with a brown powder substance, and a digital scale.

On 06-13-2021 at approximately 12:59 hours, Christopher L. Spears B/M 01-01-1988, wearing a white tank top, walked into KCFD Fire Station #10 (1505 E. 9th St) and stated he "just killed his baby mama". Spears then pulled a gun (Taurus 9mm) out of his pants pocket and handed it to one of the fire fighters. KCFD personnel contacted the KCPD and officers went to 1505 E. 9th and took Spears into custody. Spears was transported to KCPD Headquarters for questioning and the firearm was recovered as evidence.

After being read his Miranda Rights, Spears stated he and the victim were arguing over him sleeping with another female. Spears states during the argument he had his gun sitting in his lap. Spears stated the victim

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reached for his gun and they had a “tussle” over the gun. Spears stated during the tussle with the victim the gun “went off” and then he got control over the gun and shot the victim in the head.

Printed Name Det. Hobart Price #5254 Signature /s/Det. Hobart Price #5254

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

Judge

Circuit Court of _____ County, State of Missouri.