


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

POLICE NO. :	KC22023877
PROSECUTOR NO. :	095469457
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
LIONEL L BOLTON)	
)	CASE NO. 2216-CR
)	DIVISION
DOB: 08/30/1998)	
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 April 12, 2022, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Alfred Brown caused the death of Alfred Brown by shooting him, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Alfred Brown as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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.

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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 April 12, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count I, 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 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 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.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

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 A felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about April 12, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person, namely Alfred Brown and, and as a result of the above described conduct, Alfred Brown suffered injury or death.

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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 IV. 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 April 12, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, 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 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 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.

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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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/ Jamie K. Hunt
Jamie K. Hunt (#50401)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
jhunt@jacksongov.org

WITNESSES:

1. [REDACTED] E 12th St, Floor 11, Kansas City, MO
64106
2. DET Zakary K. Glidewell, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]
64106
4. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 4/29/2022

CRN: KC22023877

I, Sgt. Mark Slater #5206, of the Kansas City, Missouri Police Department
(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 4/12/2022, at 3901 Indiana Ave in
(Date) (Address)

Kansas City, Jackson Missouri LIONEL BOLTON
(County) (Name of Offender(s))

B/M 08/30/1998 [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 4/12/2022, officers of the Kansas City, Missouri Police Department were dispatched to the area of E 39th St/Indiana Ave, Kansas City, Jackson County, Missouri in regard to a Shooting. Upon their arrival, officers located a tan Dodge Nitro in the parking lot of the Family Dollar with a black male Victim inside, suffering from apparent gunshot wounds. The Victim was transported to an area hospital where he was later pronounced deceased.

The crime scene was located in the parking lot of the Family Dollar at 3901 Indiana Ave along the sidewalk in front of the business. The Victim’s vehicle was a tan Dodge Nitro (069NFU/KS), which was parked along the sidewalk facing east. The driver’s side door was ajar and the window had been busted out. Glass was laying, scattered, on the ground below. The left rear passenger window was also broken out. A white towel was observed laying amidst the glass on the ground as well. Moving to the inside of the vehicle, a cell phone sat on the driver’s seat, two \$20 bills were laying on the driver’s floorboard and a second cell phone was resting on the center console, connected to a white cable. Apparent blood was observed on the center console, driver’s seat and had pooled beneath the driver’s seat on the floorboard.

On the passenger side of the vehicle, there were two spent shell casings (WIN .45 Auto) lying on the ground just off the sidewalk.

There was a blue Ford E-150 van (996NNB/KS) was parked just to the north of the Victim’s vehicle in the parking lot. The E-150 van had an apparent bullet hole in the exterior just below the right rear window.

Detectives spoke with a witness, [REDACTED], who stated the following: [REDACTED] and was outside smoking a cigarette when he observed the Suspect enter the business. [REDACTED] continued to smoke his cigarette while talking to a female [REDACTED] then stated he looked up, heard the sounds of gunshots and saw the Suspect getting out of the victim’s vehicle. The Suspect then entered a dark colored Chevrolet HHR and fled the

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area. LD described the Suspect as a black male, about 6'2", skinny, wearing a yellow long-sleeved shirt and an afro.

Another witness [REDACTED], told detectives she observed the Suspect approach her at the registers, just prior to the homicide, at which time he asked her if she was able to give money back. She told him no and the Suspect then went to the ATM in the corner of the store to withdraw money. He then brought forty dollars in cash (two twenty dollar bills) to her at the registers and gave it to her. GM asked the Suspect what he wanted her to do with the money. The Suspect just looked at her before taking the money back and exiting the store.

Detectives reviewed city cameras and observed a blue vehicle, that looked similar to a Chevy HHR, turning south on Cleveland Ave from E 39th St after the homicide. The driver of the vehicle was observed wearing a bright yellow shirt on the city cameras.

Upon reviewing the surveillance footage received from the Family Dollar, detectives observed the Suspect, a black male with an afro-style haircut, wearing a bright yellow shirt with dark pants, enter the store at 2020hrs. He walks around the store before making his way to the corner where the ATM is located at 2021:05hrs. The Suspect then walks away from the ATM at 2021:56hrs. He then leaves the store at 2022:38hrs.

On 4/15/2022, I acquired a subpoena from Jackson County Court Division 6 for the records from the ATM located inside the Family Dollar. I served the subpoena, via email, to Cardtronics Inc.

On 4/19/2022, I received the records from Cardtronics Inc via email. The ATM records were retained in the case file as evidence.

Upon reviewing the ATM records, I obtained the credit card number that the Suspect used to withdraw cash from the ATM. I then contacted a detective with the Financial Investigations Section, who conducted a credit card BIN number search, which yielded the number was a debit card belonging to PNC Financial Services Group.

It should also be noted that the time of the withdrawal transaction at the ATM is for 4/12/2022 at 2021:39hrs, which is roughly the time the Suspect was at the ATM.

On 4/18/2022, I responded to the City Tow Lot to meet Crime Scene Investigation in regard the tan Dodge Nitro. Crime Scene processed the Victim's two cell phones inside the vehicle and then released them to my custody.

After reviewing the cell phones, detectives discovered the Victim texted an 816-647-4368 phone number on 4/12/2022 at 2005hrs with a message of 'FAMILY DOLLAR'.

A computer check of the 816-647-4368 phone number revealed it to respond back to a "Lionel Bolton" party.

On 4/22/2022, I responded to the City Tow Lot to meet Crime Scene Investigation to process the interior of the Victim's vehicle (Dodge Nitro). During the processing, I observed apparent blood on and below the driver's

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seat. I also observed blood spatter on the ceiling of the vehicle, as well as on the driver’s and left rear passenger door. A footprint was observed on the bottom of the door frame of the front passenger door. One spent shell casing (WIN .45 Auto) was located on the floorboard between the front passenger seat and the bottom of the door frame.

On 4/27/2022, detectives received information back from PNC Financial stating the name associated to the debit card account was a “Lionel Bolton.”

A computer check of the name “Lionel Bolton” responded back with LIONEL BOLTON B/M 8/30/1998. This information was passed along to undercover detectives of the Kansas City, Missouri Police Department. These detectives located the blue Chevy HHR bearing a Missouri temp tag of 05BXNU, parked in the parking lot of Shawnee Gardens Apartments (6013 King St, Shawnee, KS, 66203). BOLTON listed an address of 11211 W 60th St, which is located in the Shawnee Gardens Apartments, as an address in a KCPD incident report from 10/27/2020.

Lionel Bolton’s DOR information lists his height as 6’2” and weight 150 lbs. The suspect depicted in the surveillance video and witness descriptions of the suspect are consistent with the listed height and weight of Lionel Bolton per the DOR information.

Career Criminal preliminary analysis showed that the target suspect’s phone number was in the area of the homicide at the time of the homicide occurring. The subscriber information for that phone number lists LIONEL BOLTON as the owner / operator.

Printed Name Sgt. Mark Slater, #5206 Signature /s/ Sgt. Mark Slater, #5206

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

Judge

Circuit Court of _____ County, State of Missouri.