

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

<b>POLICE NO. :</b>	KC22058870
<b>PROSECUTOR NO. :</b>	095471146
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MELANIE BIGGINS</b>	)	
<b>1702 Gillespie Pl.</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64106</b>	)	<b>DIVISION</b>
<b>DOB: 03/02/1982</b>	)	
<b>Race/Sex: B/F</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 1st Degree (565.020-001Y20200901.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 565.020, RSMo, in that on or about on or about August 31, 2022, in the County of Jackson, State of Missouri, the defendant, after deliberation, knowingly caused the death of Etienne L McEwan by shooting him.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

**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 on or about August 31, 2022, in the County of Jackson, State of Missouri,

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the defendant committed the felony of armed criminal action charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of armed criminal action 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.

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, FL 7M  
Kansas City, MO 64106  
(816) 881-1776  
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**State vs. Melanie Biggins**

**WITNESSES:**

1. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106
2. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106
3. DET Kenneth M. Lightner, 2640 Prospect Ave., Kansas City, MO 64127

4. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

64106

7. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106
8. PO Vincent Rocha, 1125 Locust, Kansas City, MO 64106
9. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106
10. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106
11. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 08-31-2022

CRN: KC22058870

I, Detective Kenneth Lightner #5758  
(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 08-31-2022, at 1702 Gillespie Place in  
(Date) (Address)

Kansas City, Jackson Missouri Melanie M. Biggins  
(County) (Name of Offender(s))

B/F 03-02-1982 committed one or more criminal offense(s).  
(Description of Identity)

***Murder***  
***ACA***

The facts supporting this belief are as follows:

On 08-31-2022 at approximately at 0100 hours, Officers with the Kansas City Missouri Police Department were dispatched to **1702 Gillespie Place, Kansas City, Jackson County, Missouri**, on a reported shooting. Upon arrival, officers observed [REDACTED] (Age [REDACTED]) and [REDACTED] (Age [REDACTED]) standing outside of the address waving for officers. As officers entered the residence, they heard and followed **BIGGINS** voice coming from an upstairs bedroom. When officers arrived in the bedroom, they observed **BIGGINS** performing CPR on the victim laying on the bed in a pool of blood. EMS arrived on scene shortly after and declared the victim deceased.

**BIGGINS** told officers on scene that the victim was her husband. She woke up to the sound of a gunshot and noticed her husband was shot but did not see who did it. She then went downstairs and saw the front door was open.

While processing the crime scene, it was quickly determined that it was not a suicide. A pillow was located on the floor at the foot of the bed with apparent blood and a hole through it. Crime scene personnel were able to locate a projectile in the stuffing of the pillow. A blanket was also located on the floor with a hole through it and apparent gunpowder burns around the hole. In the closet of the bedroom, an empty black handgun case for a Charter Arms .38 Special was located on the top shelf. In the next door room, a purple/black Charter Arms .38 Special, was located underneath a bunk bed. The firearm had one spent shell casing still inside of the cylinder in the top position. All of the rounds inside of the firearm were PMC .38 Special's. There was no signs of forced entry to any of the main doors to the home.

On 08-31-2022, Detectives with the 1010 Homicide Squad responded out to 3101 Broadway Blvd, to conduct forensic interviews of [REDACTED] and [REDACTED].

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█████ stated the following: She was awake and lying in bed when she heard a gunshot. Shortly after, she heard the sound of footsteps going downstairs so she opened her bedroom door and walked out to the hallway. █████ then came out of her room and they both observed a light come on downstairs. █████ and █████ immediately walked down the stairs and noticed **BIGGINS** sitting on the couch. **BIGGINS** appeared as if she was scared. █████ then walked back upstairs while █████ and **BIGGINS** followed closely behind her. As she approached her parent's room, she turned the hallway light on and began calling the victim's name but there was no response. She entered her parents' bedroom and observed the victim lying on the bed so she turned on the lamp next to the bed. █████ immediately noticed that the victim was bleeding, so she ran back into her room to call the police. █████ handed the phone to **BIGGINS** and the call takers told her to begin CPR. While **BIGGINS** was doing CPR, she could hear the victim gurgling blood. █████ and █████ both went downstairs until police arrived.

█████ stated the following: She woke up just before she heard a gunshot go off. When the gunshot went off, her ears began ringing and her vision became blurry. She was scared to leave her bedroom until she heard █████ open up her bedroom so she came out into the hallway as well. While out in the hallway with █████, they observed a light come on downstairs. █████ and █████ both immediately walked down the stairs and noticed **BIGGINS** sitting on the couch. **BIGGINS** appeared as if she "had seen a ghost". Shortly after sitting with **BIGGINS**, █████ walked back up the stairs. **BIGGINS** and █████ closely followed █████ up to their parent's room. As █████ approached her parent's room, she turned the hallway light on and began calling the victim's name but there was no response. █████ entered the bedroom and observed the victim lying on the bed so she turned on the lamp next to the bed. █████ immediately noticed that the victim was bleeding, so she ran back into her room to call the police. █████ handed the phone to **BIGGINS** and the call takers told her to begin CPR. █████ and █████ both went downstairs until police arrived. While downstairs, █████ noticed that the deadbolt to the front door was unlocked but the handle was locked. █████ said that was weird because both locks are always locked.

On 08-31-2022, Detectives with the 1010 Homicide Squad conducted an interview of **BIGGINS** at 1125 Locust Street. **BIGGINS** stated the following: She was in bed sleeping with her husband, the victim. While sleeping on the right side of the bed, her husband was sleeping on the left side of the bed on his right side. She woke up to a loud gunshot. She immediately sat up, felt blood on her arm, crawled over the victim, and turned the lamp on. When she turned the lamp on, she observed █████ and █████ standing in the doorway of their bedroom with nothing in their hands. She rolled the victim onto his back and observed a gunshot wound under his chin near his neck. █████ immediately called police and handed her the phone. The call taker told her to begin CPR, so she conducted CPR until police arrived. **BIGGINS** said that she stayed in the bedroom the entire time until police arrived. **BIGGINS** said the only firearm in the residence would be the victim's rifle that was in the closet. **BIGGINS** then denied owning a firearm and denied knowing that there was gun box for a revolver handgun in her closet. After confronting **BIGGINS** about her buying the found .38 revolver, she admitted that she did buy the gun in July, 2022. When asked about her firearm being located under a bed in a separate room, she was unable to explain. When asked about her relationship with the victim, she said they were legally married for 9 years. Due to financial problems, she has been in an intimate relationship with another man for a year and a half. **BIGGINS** has also wanted to get a divorce from the victim but due to their financial struggles, that is currently not an option.

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Detectives located the Firearms Transaction Record showing BIGGINS bought the .38 Revolver from Shop N' Pawn, 12807 E. 40 Hwy, Independence, Missouri, on 07-19-2022.

The Jackson County Medical Examiner's Officer sent the Preliminary Anatomic Diagnosis which ruled the death a homicide and a gunshot entrance wound to the back of the head.

**BIGGINS** appears to have no prior criminal history.

Printed Name Detective Kenneth Lightner #5758 Signature /s/ Detective Kenneth Lightner #5758

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.