


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

<b>POLICE NO. :</b>	22-06563
<b>PROSECUTOR NO. :</b>	095471161
<b>OCN:</b>	pq005907

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MICHAEL E. HAMILTON</b>	)	
<b>1142 SW. Arborfair Dr.</b>	)	<b>CASE NO. 2216-CR</b>
<b>Lees Summit, MO 64082</b>	)	<b>DIVISION</b>
<b>DOB: 04/28/1999</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200999.0)**

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 on or about August 31, 2022, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Robert E. Hamilton by shooting him.

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 (571.015-001Y20205299.0)**

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, 571.015.2, 571.015.3, RSMo, in that on or about on or about August 31, 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.

**State vs. Michael E. Hamilton**

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/ Jeremy J. Baldwin*  
Jeremy J. Baldwin (#62734)  
Assistant Prosecuting Attorney  
321 West Lexington Avenue  
Independence, MO 64050  
(816) 881-4592  
jbalwin@jacksongov.org

**WITNESSES:**

1. [REDACTED]
2. PO William Foutz, 10 NE Tudor, Lee's Summit, MO 64086
3. PO Conner Frame, 10 NE Tudor, Lee's Summit, MO 64086
4. [REDACTED]

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5. [REDACTED]  
6. Robert E. Hamilton, 1142 SW Arborfair Dr., Lees Summit, MO 64082

7. [REDACTED]

8. PO Stephen Owings, 10 NE Tudor, Lee's Summit, MO 64086

9. [REDACTED]

[REDACTED] DET Michael Reese, 10 NE Tudor, Lee's Summit, MO 64086

[REDACTED]

[REDACTED]

[REDACTED]

# STATEMENT OF PROBABLE CAUSE

Date: 9/2/22

Lee's Summit P.D. Case Number: LSPD22-06563 Murder 1st

I, Detective 1311 - Brownell, Ryan, an investigator with the Lee's Summit, Missouri, Department of Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that **08/31/2022**, in the area of **1142 SW Arborfair Dr**, the suspect, **HAMILTON, MICHAEL E (Race: White, Sex: Male, DOB: 4/28/99, and [REDACTED] [REDACTED])** committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 8/31/22, at approximately 2123 hours, Lee's Summit Police Department Officers were dispatched to 1142 SW Arborfair Dr. on a reported death investigation.

Officer Frame arrived on scene and observed the deceased, Robert Hamilton, lying on the kitchen floor, with a pool of blood surrounding him. Robert's wife, Amy, was lying on top of him crying.

Officer Frame contacted [REDACTED] was on scene. She stated she was texting earlier in the evening with Robert about an Ipad she purchased which he was going to pick up for her. The last message she received from Robert was at 1712 hours. At 1838 hours, she attempted to call Robert multiple times, but he did not answer.

[REDACTED] stated [REDACTED], Michael Hamilton, has been living with her father the last couple of weeks and she tried to contact him with negative results. She responded to his residence from Columbia, MO at 2116 hours, and knocked on the door but no one answered which was unusual since Robert's truck was parked outside. Julia told Officer Frame, Amy arrived home from work and noticed the front door was locked, which she thought was strange since it is usually unlocked. Amy used her key to unlock the door and entered her residence where she found Robert unresponsive, laying on the floor in a pool of blood. Julia stated she was unable to locate Michael in the residence. Michael suffers from mental health issues and has always had a hostile relationship with Robert.

Officer Frame then contacted, Amy Hamilton, Robert's wife, who stated she left the residence to go to work and had spoken with Robert, a couple times, throughout the day. At 1806 hours, Robert called her and they had a two-minute conversation. That was their last communication. She returned home at 2115 hours and found Robert lying on the kitchen floor unresponsive.

On 08/31/2022 at 2316 hours, Lee's Summit Police dispatch pinged Michael's cell phone, which responded to the area of Franklin, KS (8678-meter radius). It was pinged again on the same day at 2339 hours, which it showed in the area of Holton, Kansas (2070-meter radius).

The Jackson County Medical Examiner's Office investigated responded and took possession of Robert who had no obvious visible signs of a gunshot wound.

On 9/1/2022 at approximately 0745 hours, the Medical Examiner's Office contacted the Lee's Summit Police Department and notified them they had located a bullet (unknown caliber) in Robert's head. Detectives responded to the Jackson County Medical Examiner's Office for the autopsy. Detectives learned there was a single medium caliber bullet, possibly a .380 or 9mm, gunshot wound to the back of the skull. At the entry point there was stippling and soot around the wound, which the medical examiner explained indicated the shot was from approximately 2-4 inches away. The bullet lodged into the skull behind the right eye and there was no exit wound.

An area canvass with the neighbors revealed Ring video footage of Michael's blue Chevrolet Silverado truck leaving the residence at 1865 hour with the driver wearing a high-visual shirt. Obtained LPR alerts for the license plate registered to Michael and his truck showed multiple alerts to include one on 09/01/2022 at 0310 hours in the area of Eastbound US 36 Hwy, Wathena, KS and another on 09/01/2022 at 0815 hours in the area of 12th and Paseo, Kansas City, MO. Lee's Summit Police initial ping of Michael's cell phone on 08/31/2022 responded to the area of Holton, KS with a follow-up ping on 0901/2022 showing Michael's cell phone traveling Eastbound on I-70 toward Boonville, MO in Cooper County. Previous information was obtained that Michael's mother, Deanna Williams, lived in Columbia, Missouri and he was possibly heading there. The cell phone ping was 50 miles west of Columbia, Missouri.

Lee's Summit dispatch disseminated a BOLO (be on the lookout) for Michael's blue 2002 Chevrolet Silverado (MO 1HDG70) and issued a Person of Interest for Michael.

Missouri State Highway Patrol Troop F and Cooper County Sheriff's Department located the vehicle and a stop was conducted. Michael was taken into custody. Located with Michael was a .380 handgun, on his hip loaded with 6 round. In the center console was a loaded 9mm handgun which was loaded with 13 lives rounds and one spent shell casing in the chamber which did not eject. The 9mm had no serial numbers or markings on the gun. Each handgun appeared to have blood on them. Detective Owings responded to Cooper County to take custody of Michael. Once in custody, he stated Michael did not have any cuts or wounds on his hands or arms which caused the blood to be on either handgun.

Detectives conducted a search warrant on 09/01/2022 at approximately 1150 hours, at 1142 SW Arborfair Dr and located (2) separate notes. One was located on the stairwell going into the basement. It read "I cleaned this" Then below that it read "He was abusive" Then below that was "No!" with a drawn frown face. A second note was located on a black notebook which appeared to be a list of things to do. The note was located in the bedroom, where Michael resides (mail with his name was located in the bedroom). On the bottom of the note it read, "I didn't want this!!!" With a drawn frown face next to the writing.

Detectives recovered Michael's clothes and transported them to the Lee's Summit Police Department. The clothing was photographed and one of the items recovered was a long sleeve yellow shirt. Michael's jeans and boots were also recovered and they had what appeared to be blood on them. Both items later were tested with Hemastix, which came back with a positive presumptive presence for blood.

Michael's vehicle was towed from the scene by Nash Towing to the Cooper County, Missouri Sheriff's Department holding facility. Detective Reese obtained a search warrant through the 18th Circuit Court, Cooper County, Missouri to recover the vehicle, which was towed to the Lee's Summit Police Department 4-bay garage and secured.

Detective Easley conducted an area canvass and located a Ring doorbell video. In the video from the resident at 1181 SW Arborfair Dr (3 buildings to the west of victim's residence) on 08/31/2022 at approximately 1856 hours, it shows the suspect vehicle driving westbound with the driver wearing a neon lime green or yellow shirt.

The recovered 9mm and .380 handguns, along with the recovered spent bullet from the Medical Examiners Officer were transported to the Kansas City Police Department crime lab for firearm and ballistic analysis.

The Kansas City Police Department crime lab concluded that the spent bullet recovered from the victim was fired from the 9mm handgun.



09/02/22

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Signature of Detective 1311 - Brownell, Ryan

Date