

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

<b>POLICE NO. :</b>	KC22066345
<b>PROSECUTOR NO. :</b>	095471562
<b>OCN:</b>	HS036257

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>MICHAEL L YOUNG</b>	)	
<b>1467 N. 5th Street</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, KS 66101</b>	)	<b>DIVISION</b>
<b>DOB: 10/24/1995</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200901.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 September 30, 2022, in the County of Jackson, State of Missouri, the Defendant knowingly, with the purpose of causing serious physical injury to Antwon Jones, caused the death of Antwon Jones by shooting him.

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 (571.015-001Y20205299.0)**

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, RSMo, in that on or about September 30, 2022, in the County of Jackson,

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State of Missouri, the Defendant committed the felony of Murder in the Second Degree, charged in Count 1, 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.

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/ Luke H. Alsobrook*  
Luke H. Alsobrook (#66442)  
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**WITNESSES:**

1. DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106
2. SGT Pedro J. Caraballo, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]
4. [REDACTED]
5. CPT Ronald R Legg, 1125 Locust, Kansas City, MO 64106
6. SGT Caleb M. Lenz, 1125 Locust, Kansas City, MO 64106
7. [REDACTED]
8. [REDACTED]
9. SGT Le Grande S. McGregor, 1125 Locust, Kansas City, MO 64106
10. PO Patrick T. Moss, 1125 Locust, Kansas City, MO 64106
11. DET Derek M. Sanders, 1125 Locust, Kansas City, MO 64106
12. CPT Kari D. Thompson, 1125 Locust St., Kansas City, MO 64106
13. PO Mathew A. Vaccaro, 1125 Locust, Kansas City, MO 64106
14. DET Nathan S. VanVickle, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 09-30-2022

CRN: KC22066345

I, Detective Derek Sanders #5742, 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 09-30-2022, at 2715 Benton Boulevard #1S in  
(Date) (Address)

Kansas City, Jackson County Missouri Michael L. Young  
(County) (Name of Offender(s))

DOB 10-24-1995 / [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 09-30-2022 at 0945 hours, officers of the Kansas City Missouri Police Department were dispatched to 2715 Benton Boulevard [REDACTED] Kansas City, Jackson County, Missouri, on a reported shooting.

Upon their arrival, a male victim, identified as Antwon Jones by his girlfriend on scene, was located in the bathtub of the apartment, suffering from apparent gunshot wounds to his sternum. Officers performed CPR on the victim until KCFD/EMS arrived and transported the victim to Truman Medical Center (TMC), 2301 Holmes. Upon arrival to TMC the victim was pronounced deceased.

Responding officers stated a shell casing was located on the victim and two more were observed in the area of the victim.

The [REDACTED], [REDACTED] stated the following-she and the victim were in the bedroom of the apartment planning their day, when the suspect's [REDACTED] called the victim into the living room. [REDACTED] stated she stayed in the bedroom, however could hear the victim utter, "What's up Cuzzo." She heard the victim's cousin (MICHAEL YOUNG B/M 10-24-1995) voice but could not make out what he was saying. [REDACTED] stated the victim uttered, "You gon put that on me like that," followed by three gunshots.

[REDACTED] stated she fell to the floor, grabbed her firearm and exited the bedroom. She stated as she did so, she observed YOUNG running out of the apartment. [REDACTED] stated the victim called for her. She found the victim in the bathroom suffering from gunshot wounds. She tried to help the victim who was uttering, "He shot me. He shot me."

[REDACTED] further stated YOUNG was wearing a sleeveless grey hooded jacket, a black t-shirt under it with grey or black sweatpants. She also stated the victim and YOUNG got into a physical altercation on or about 09-20-2022, however it was never determined what provoked the altercation. [REDACTED] has known YOUNG for quite some time and provided a photograph of YOUNG to detectives.

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█ stated the following-she was in the living room when her son, **YOUNG** knocked on the window. She called the victim into the living room to let **YOUNG** inside of the apartment. She stated the victim and **YOUNG** had a brief conversation in the living room before they walked to the back of the apartment. █ stated she then heard gunshots. She did not see her son leave the apartment.

On 9/30/2022 at 2233hrs, officers with the Kansas City, Missouri Police Department responded to a call for service at 2713 Benton Blvd, Apt #1S in regard to a Suspicious Party. Upon arrival, officers contacted **YOUNG** in the front yard of the apartment building. **YOUNG** was taken into custody at that time and transported to KCPD Headquarters.

Detectives responded to the crime scene at 2715 Benton Blvd, Apt #1S. Upon arrival, detectives entered the apartment and observed it to be dirty and unkempt. A 9mm tan handgun, belonging to the Victim's girlfriend █ was sitting on the table by the TV in the living room. A handgun magazine was observed lying adjacent to the firearm. There was one bullet in the chamber and the magazine was loaded full.

As detectives made their way through the apartment, they located apparent blood pooled on the floor in the hallway just outside of the restroom and east bedroom. Medical intervention equipment was observed on the floor as well. Blood was observed on the bottom portion of the restroom door. Two spent 9mm shell casings were located on the floor of the restroom adjacent to the toilet. An additional spent 9mm shell casing was located inside the bowl of the toilet in the water. While on scene, officers advised detectives a spent shell casing was located resting on the arm of the Victim when they arrived. The officers recovered the shell casing in an attempt to preserve evidence.

Detectives located a handgun magazine in the east bedroom. It was inside a purse sitting on the bed. The base of the magazine was a tan color and appeared to match the color of the handgun recovered from the living room.

Detectives contacted **YOUNG** at headquarters where he provided the following statement: **YOUNG** was driven to 2715 Benton Blvd by a friend of his named █ **YOUNG** entered the apartment building and knocked on the door to #1S, which is his mother's (█) apartment. The Victim opened the door and **YOUNG** was surprised to see him. **YOUNG** commented that his mother, █ was sitting on the couch in the front room. **YOUNG** and the Victim walked back towards the back of the apartment when **YOUNG** asked the Victim to leave the apartment. The Victim told **YOUNG** he wasn't going to leave unless **YOUNG** "put him out." At that time, **YOUNG** walked towards the Victim, and the Victim put his hand into his hoodie pocket. **YOUNG** clarified he never saw a gun on the Victim, only that he believed he saw a "clip" of a gun sticking out of the Victim's pocket. **YOUNG** also knows the Victim to carry guns regularly. When the Victim put his hand in his hoodie pocket, **YOUNG** pulled out his gun. The Victim said, "Oh, you got a gun?" and started "reaching," so **YOUNG** shot the Victim. After the shooting, Evans-Williams asked, "What's going on? What's going on?" and walked back to **YOUNG**. He further stated he didn't say anything to Evans-Williams and he left the apartment. He got into "Christy's" vehicle and left the area with her. After some time, **YOUNG** told "Christy" to drop him off because he wanted to walk. **YOUNG** was unsure of where he was when he started walking, but he threw the gun into a wooded area.

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After a while of speaking with detectives, **YOUNG** eventually stated he always brings a gun over to his mother's [REDACTED] apartment because he knows the Victim is over there often.

The case detective is requesting an arrest warrant in lieu of a summons for the listed offender as the circumstances of the crime was violent in nature. "**YOUNG** has had prior contacts with law enforcement Officers. In light of the recent incident and his recent conduct, the case detective believes the offender is a danger to the public.

Printed Name Det. Derek Sanders #5742 Signature /s/ Det. Derek Sanders #5742

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

\_\_\_\_\_  
Judge

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