

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

<b>POLICE NO. :</b>	23-001770
<b>PROSECUTOR NO. :</b>	095474485
<b>OCN:</b>	QZ004385

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>COLLINS I MILIMU</b>	)	
██████████ <b>Manchester Ave.</b>	)	<b>CASE NO. 2316-CR</b>
<b>Grandview, MO 64030</b>	)	<b>DIVISION</b>
<b>DOB: 11/04/1985</b>	)	
<b>Race/Sex: B/M</b>	)	
████████████████████	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Domestic Assault 1st Degree - Serious Physical Injury (565.072-001Y20201302.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.072, RSMo, committed the class A felony of domestic assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about May 14, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Confidential Victim #1 by striking Confidential Victim #1 with a hammer, and Confidential Victim #1 and defendant were family or household members in that Confidential Victim #1 and the defendant were persons who resided together.

**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 May 14, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Domestic Assault in the First Degree - Serious Physical Injury charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Domestic

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Assault in the First Degree - Serious Physical Injury by, with and through, the knowing use, assistance and aid of a dangerous instrument.

**Count III. Domestic Assault 1st Degree - Serious Physical Injury (565.072-001Y20201302.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.072, RSMo, committed the class A felony of domestic assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about May 14, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Confidential Victim #2 by striking Confidential Victim #2 with a hammer, and Confidential Victim #2 and defendant were family or household members in that Confidential Victim #2 and the defendant were persons who resided together.

**Count IV. 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 May 14, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Domestic Assault in the First Degree - Serious Physical Injury charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Domestic Assault in the First Degree - Serious Physical Injury by, with and through, the knowing use, assistance and aid of a dangerous instrument.

**Count V. Domestic Assault 1st Degree - Serious Physical Injury (565.072-001Y20201302.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.072, RSMo, committed the class A felony of domestic assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about May 14, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Confidential Victim #3 by striking Confidential Victim #3 with a hammer, and Confidential Victim #3 and defendant were family or household members in that Confidential Victim #3 and the defendant were persons who resided together.

**Count VI. 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

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(571.015.1) (571.015.2) (571.015.3), RSMo, in that on or about on or about May 14, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Domestic Assault in the First Degree - Serious Physical Injury charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Domestic Assault in the First Degree - Serious Physical Injury by, with and through, the knowing use, assistance and aid of a dangerous instrument.

**Count VII. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20203802.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections (558.011) (558.002 and 558.011), RSMo, in that on or about May 14, 2023, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of Confidential Victim #4, a child less than seventeen years of age, by striking Confidential Victims #1, and #2, with a hammer and Confidential Victim #4 was found by law enforcement in the same room as Confidential Victims #1 and #2.

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/ Shiante McMahan*  
Shiante McMahan (#66613)  
Assistant Prosecuting Attorney  
415 East 12th Street  
Floor 7M  
Kansas City, MO 64106  
(816) 881-3831  
SMcMahan@jacksongov.org

**WITNESSES:**

1. Confidential Victim #3, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. PO Reece Conner, 1200 Main Street, Grandview, MO 64030
3. PO Kaitlyn B. Elias,
4. PO Michael Feira, 1200 Main Street, Grandview, MO 64030

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5. PO Christopher Jennings, 1200 Main, Grandview, MO 64030
6. Stefany Jones, 1200 Main St., Grandview, MO 64030
7. Confidential Victim #4, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
8. Witness #2, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
9. Witness #1, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
10. Confidential Victim #2, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
11. Confidential Victim #1, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
12. PO Joey K. Nussbeck, 1200 Main Street, Grandview, MO 64030
13. PO Thorin Savage, 1200 Main Street, Grandview, MO 64030

**GRANDVIEW STATEMENT OF PROBABLE CAUSE**

**Report Number: 23001770**

**I, Detective Elias, 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 05/14/2023, at approximately 2224 hours, at \_\_\_\_\_, Grandview, Jackson County, Missouri 64030, (Milimu, Collins I) committed one or more criminal offenses.**

On 05/14/2023, at approximately 2224 hours, Grandview police were dispatched to the area of 13000 block of Manchester Avenue, Grandview, Jackson County, Missouri 64030 in regard to an assault. The reporting party advised Victim #3 arrived at his residence with an obvious injury to the left side of his head. The reporting party was unable to understand Victim #3 due to his injuries. The reporting party provided officers with the Victim #3's address - the location of the crime.

Upon arrival, officers observed Milimu exit his residence, a residence he shares with Victims #1, #2, #3, and #4. Milimu fled on foot and, after a brief foot chase, Milimu was detained. Milimu had a deep laceration to his right palm and several lacerations to his index and middle fingers on his right hand.

As officers detained Milimu, they were notified by dispatch they had received an open line 911 call from a subject who was breathing heavily, asking for help, and an ambulance. The address where the phone pinged was Milimu's residence - the address from which he fled.

Officers forced entry into the residence and discovered Victims #1, #2, and #4. Victims #1 and #2 had apparent critical/life-threatening injuries. Two witnesses, Witness #1 and #2, were located unharmed inside the residence. As officers rendered aid to Victim #1, he told them Milimu hit him.

All four victims were transported to the hospital for emergency medical treatment. Milimu was also transported to the hospital where he subsequently received treatment for his wounds.

A large amount of blood was present in the home - on the stairway from the entry way on to the main level of the house, kitchen, hallway, and bathroom. Examination of the kitchen; which was covered in blood on the floors, cabinets, and walls; revealed a baseball bat and knife. Both objects were saturated in blood. A small hammer with a claw was located in the dining room adjacent to the kitchen. The hammer was covered in apparent blood. The door to the basement bedroom (bedroom belonging to Victim #3) appeared to be heavily damaged. Obvious tool markings consistent with the claw of a hammer were seen on the outside of the door. Also on the fragments of door pieces were small droplets of blood.

Investigators conducted a custodial interview of Milimu. After being read his Miranda Rights, Milimu admitted that, after drinking half of a beer by himself, and thinking about how he was disrespected by Victims #1, #2, and #3 several times over the course of the last few weeks, Milimu became enraged/overwhelmed. Milimu recalled seeing Victim #1 and #2 asleep on the couch and as he looked at them he wasn't "feeling good". Milimu took out the trash and when he returned he saw there was a "hammer there". Milimu continued to drink and then got overwhelmed. Milimu then grabbed the hammer and admitted to striking Victims #1, #2, and #3 with the hammer - each one time in the head. Milimu advised Victims #1 and #2 were on the couch and Victim #3 emerged from the basement. Milimu said as he hit the victims with the hammer, he mentioned how he was going to do them like they did him. Milimu said he retaliated against Victim #1. Milimu also said he needed "my sense of revenge". After he hit all 3

(ATTACH ADDITIONAL SHEET(S) IF NEEDED)

victims with the hammer, he and Victim #1 fought. Milimu advised the fight moved from the living room and into the kitchen. Milimu couldn't recall whether he had the hammer in his hand. Milimu denied knowledge of a knife. When asked what part of the hammer Milimu used, he advised that he "started out with the flat part."

Throughout the interview, Milimu spoke about how he believed Victims #1, #2, and #3 were conspiring against him. Milimu believed Victims #1, #2, and #3, in the past, had struck him on the head with a hammer and baseball bat but said that it was related to his seizures. Milimu advised he does have a history of seizures. Milimu confirmed that he was not provoked or attacked first in the incident and that all he knew was he hit Victim #1 with a hammer and they "went at it".

Milimu denied knowledge of the damage to the door in the basement. Milimu pointed to a small flesh color mark on the back of his head which he indicated was a new wound from 3 days ago. The wound did not appear to be consistent with a fresh wound. Furthermore, Detective Elias was informed by Detective Savage that Milimu's CT scan returned with normal results.

Victims #1, #2, #3, and #4 are associated to Milimu as "domestic victims".

Victim #1 is receiving care at a local ICU for injuries to the left side of his head. Victim #1 is in and out of consciousness and the attending physician believed the injuries were caused by the claw side of a hammer. Victim #1 advised that Milimu hit him causing his injuries.

Victim #2 is receiving care at a local ICU for injuries to the right side of her head. Victim #2 is presently on a ventilator and will require a steel plate on the right side of her head. Victim #2 is not conscious. The attending physician believed, most likely, Victim #2 will be paralyzed in some capacity on her left side.

Victim #3 is receiving care at a local hospital for a traumatic brain injury and depressed left skull fracture. These injuries necessitated emergency neurosurgery. After completion of the surgery, Victim #3's speech progressed and he was able to provide a statement. Victim #3 reported he was downstairs in his room playing video games when he heard noises upstairs. Once upstairs, he saw a large amount of blood and he returned to the basement then shut and locked his door. Milimu broke down the door and hit Victim #3 in the head with the hammer in Victim #3's room in the basement. Victim #3 believed the hammer was stuck in his head. Victim #3 ran upstairs and Milimu struck him several more times with a baseball bat. Victim #1 then fought with Milimu and Victim #3 ran to the neighbor's residence but was unable to communicate properly at that time. Prior to leaving the residence, Victim #3 saw Milimu strike Victim #2 with an unknown weapon.

Victim #4 was treated at a local hospital for a large, left side, frontal scalp hematoma. Victim #4 was treated and released. Victim #4 is a juvenile less than seventeen years of age.

Kaitlyn Elias

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DETECTIVE

/s/ Kaitlyn Elias

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THE COURT FINDS PROBABLE CAUSE.

JUDGE

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DATE

(ATTACH ADDITIONAL SHEET(S) IF NEEDED)