


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

<b>POLICE NO. :</b>	23-003417
<b>PROSECUTOR NO. :</b>	095474545
<b>OCN:</b>	PQ007309

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ANTONIO HARRIS</b>	)	
<b>5200 Jackson Ave.</b>	)	<b>CASE NO. 2316-CR</b>
<b>Kansas City, MO 64130</b>	)	<b>DIVISION</b>
<b>DOB: 02/25/1998</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B Felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about May 17, 2023, at 120 NE Chipman Road, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at another person or persons, John and/or Jane Doe.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

**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

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.

**State vs. Antonio Harris**

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  
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**WITNESSES:**

1. DET Chad Albin, 10 NE Tudor, Lee's Summit, MO 64086
2. DET Scott Doumitt, 10 NE Tudor, Lee's Summit, MO 64086
3. PO William Foutz, 10 NE Tudor, Lee's Summit, MO 64086
4. DET Michael Reese, 10 NE Tudor, Lee's Summit, MO 64086
5. PO Ryan Small, 10 NE Tudor, Lee's Summit, MO 64086

# STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 23-3417

Date: May 18, 2023

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

1. I have probable cause to believe that on 05/17/23, at 120 NW Chipmand Road, Lee's Summit, Jackson County Missouri, Harris, Antonio, committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 05/17/23, at 2234 hours, Officers with the Lee's Summit Police Department received several calls regarding shots being fired at Lea Mckeighan Park located at 120 NE Chipman Road, Lee's Summit, MO 64086. Upon officer's arrival they noticed several people running through the park and multiple vehicles leaving the area at a high rate of speed. Officers began conducting their investigation and noticed a large amount of spent firearm shell casings scattered throughout the property to include multiple 9 mm casings, 10 mm casings, .40 caliber casings, .45 caliber casings, 7.62 X 39 caliber casings and 5.7 X 28 caliber casings, as well as several spots of blood in various locations of the parking lot.

Officer Miller spoke to W1 who stated a black male with long dreads next to a red Corvette was holding a firearm. She did not see him fire shots, as she ducked while there were several other people also shooting in the area.

Det. Treacy conducted an interview of W2 who was at the park when the incident occurred. W2 stated several people began shooting and he ducked below his vehicle, which was also parked next to the red Corvette. W2 advised the driver of the Corvette, a black male with long dreads was observed handing another male a firearm prior to assisting an injured male into the passenger seat of his Corvette and leaving the area.

Officer Breedlove and Officer Tiedemann responded to St. Luke's East Hospital as it was reported a victim from the shooting was in the emergency room. Officer Tiedemann arrived at the hospital and located a red Corvette (license 3EA615 MO) parked in front of the emergency room that matched the involved Corvette. Officer Tiedemann responded to the opened top Corvette and observed a bullet hole in the driver side door as well as blood on the passenger side floor of the vehicle. The operator of the Corvette standing near his vehicle was identified as Antonio Harris. Harris stated he had just drove his friend to the hospital after he was shot and did not see anything related to the shooting incident.

Video of the incident from security cameras at the park was obtained and reviewed. The video showed Harris with several others hanging around his Corvette. During this time, a group of three males walking through the park across the parking lot from Harris' location appeared to getting confronted by an unknown male following them. After being followed a short distance by the unknown male, one of the three males he was following was observed quickly turning around while in possession of a handgun and discharging the handgun striking the unknown male. The unknown male who was shot fell to the ground, got right back-up and ran to the west away from the three males while the three males immediately ran to the east even further from Harris' location. Harris is then seen laying on the ground next to his Corvette once the gun fire begins. Harris pulls a rifle style firearm consistent with an S/K rifle that uses 7.62 X 39 caliber ammunition from his person as he is laying down between vehicles. At this point, Harris is then observed assisting the injured male up and then over to the passenger side of his vehicle with no visible immediate threats toward them observed. The injured male then hands back Harris the S/K style rifle who then walks back to the other side of his vehicle and passes the rifle off to another unknown male. Harris is then

observed removing a handgun from his person and firing multiple gunshots toward the east through the parking lot while there are still many people present and trying to exit the park with no immediate threat toward him observed. After firing multiple shots with handgun, Harris then passes off the handgun to another male who runs to a different area of the parking lot. Harris enters the driver's seat of the Corvette and observed to quickly exit the parking lot with the injured subject. This incident occurred in Lee's Summit, Jackson County, MO.

Detective Ryan Small #1704  
**Print Name (Detective)**

/S/ Detective Ryan Small #1704  
**Signature (Detective)**

May 18, 2023  
**DATE**