

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

POLICE NO. :	KC23054696
PROSECUTOR NO. :	095476503
OCN:	HU014563

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
ANTHONY T. ADAMS)	
██████████)	CASE NO. 2316-CR
Kansas City, MO 64132)	DIVISION
DOB: ██████████)	
Race/Sex: B/M)	
S.S.N.: XXX-XX-██████)	
	DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the class C felony of involuntary manslaughter in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 13, 2023, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of ██████████ by shooting him.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

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 13, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of involuntary manslaughter in the first degree charged in Count

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One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of involuntary manslaughter in the first 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/ Jeannette Wolpink, #54970
Assistant Prosecuting Attorney
415 E. 12th ST, Kansas City, MO

WITNESSES:

The State's witnesses as of 10/31/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORMDate: 08/14/2023CRN: KC23054696I, Det. [REDACTED] Kansas City Missouri Police Department 1010 Homicide Squad

(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 08/13/2023, at [REDACTED] in
(Date) (Address)Kansas City, Jackson Missouri Anthony Adams
(County) (Name of Offender(s))[REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08/13/2023 at 1750 hours, officers of the Kansas City Missouri Police Department were dispatched to [REDACTED], Kansas City, Jackson County Missouri in regard to a reported shooting. Upon arrival, officers entered the residence and observed suspect #1 standing in the front room. Suspect #1 spontaneously uttered "It was an accident, it was an accident." Suspect #1 was placed in custody and transported to Police Headquarters.

On 08/13/2023, members of the Kansas City Missouri Police Department's 1010 Homicide Squad responded to [REDACTED] where officers were on scene of a homicide. While on scene, detectives were notified that witness #1 may have witnessed the incident. Detectives transported witness #1 to Police Headquarters to obtain a statement.

Detectives observed [REDACTED] to be a single-story single-family residence. Detectives obtained a search warrant for the residence. Upon entering the residence, detectives observed the decedent sitting on the couch in the front living room just inside the door. Detectives observed the decedent to have his right pant leg cut and a tourniquet placed on his upper right thigh. Below the tourniquet, detectives observed an apparent defect in the decedent's inner right thigh. Detectives observed a black and silver semi-automatic handgun laying on the living room coffee table. Next to the handgun, detectives observed a silver and black pistol magazine that contained 9 live .40 PPU S&W rounds. A spent bullet was located under the TV stand that was on the NW corner of the living room. A spent .40 PPU S&W shell casing was located in front of the TV stand in the NW corner of the living room.

On 08/13/2023, Detectives contacted witness #1 in interview room #3 on the 7th floor of Police Headquarters where witness #1 stated the following: He arrived to [REDACTED] on 08/13/2023 and the suspect and the victim were already there. They were hanging out and the suspect was sitting in a chair just outside the kitchen and the victim was sitting on the couch holding a slice of pizza. He stood up, walked between the suspect and victim and went to walk out of the house. As he approached the front door, he heard a loud bang.

PROBABLE CAUSE STATEMENT FORM

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When he heard the loud bang, he continued to walk out the front door. After walking out the front door, the suspect walked outside and told him to call 911. He could not call 911 because he did not have his phone. During the interview, witness #1 stated the incident was "bull shit" because it was over the victim going to the "ice box" and having a slice of pizza.

On 08/13/2023, Detectives contacted the suspect in interview room #1 on the 7th floor of Police Headquarters where suspect #1 stated the following the incident was an accident. After stating the incident was an accident, suspect #1 requested an attorney and the interview was terminated.

Detectives reviewed responding officers body camera footage which revealed the following: Officers entered the house and contacted the suspect. They placed the suspect into custody and escorted him out of the house. While officers were gathering the suspects information, the suspect made several spontaneous utterances where he says the incident was an accident and that the victim was drunk and he had told the victim to calm down. The suspect apologizes on numerous occasions and continually states the incident was an accident. Detectives reviewed the 911 air tapes of the initial call where suspect #1 calls 911 for help. While reviewing the 911 air tapes, suspect #1 admits on multiple occasions that he shot the victim.

A functionality test of the firearm recovered from the coffee table was conducted by the Kansas City Regional Crime Lab which revealed the firearm functioned properly. On 09/27/2023, detectives received a crime lab report from the Regional Crime lab that revealed the following information: a swab of the trigger area of the firearm that was recovered from the coffee table revealed suspect #1 was a known contributor along with 1 unknown and that the extent of support very strongly supports that scenario. During the DNA testing, victim #1 and witness #1 were excluded as potential contributors.

Printed Name Det. [REDACTED] Signature /S/ Det. [REDACTED]

The Court finds probable cause and directs the issuance of a warrant this 31st day of October, 2023.

SIGNED BY JUDGE

This is a redacted public document. The original unredacted document bears the Judge's signature.

Judge

Circuit Court of Jackson County, State of Missouri.