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

Police# 16-051525 Prosecutor# 095433522 1616-CR OCN#

## **COMPLAINT**

STATE OF MISSOURI

VS.

Antonio Maurice Miles 7912 E. 51st Terr. Kansas City, MO 64134 DOR: 05/26/1975: Page/S

DOB: 05/26/1975; Race/Sex: B/M;

SS#

Defendant.

#### Count I. Murder 2nd Degree (565.021-001Y19840903.0)

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 July 17, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of James Hines 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 (571.015-001Y19755299.0)**

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 July 17, 2016, 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.

#### THE STATE OF MISSOURI

VS.

#### **Antonio Maurice Miles**

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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,

Trisha Lacey (#55710)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, Missouri 64106
TLacey@jacksongov.org

#### WITNESSES:

PO Ryan J. Arnold , 1125 Locust, Kansas City, MO 64106 DET Jason C. Findley , 1125 Locust, Kansas City, MO 64106 DET Wayne C. Fitzner , 1125 Locust, Kansas City, MO 64106 James L. Hines , Prosecuting Atty. Office, Kansas City, MO 64106 DET Kristofer R. Oldham , 1125 Locust, Kansas City, MO 64106

#### PROBABLE CAUSE STATEMENT FORM

CRN: 16-051525

I, Det. Ray Lenoir of the Kansas City M (Name and identify law enforcement officer knowing that false statements on this for	, or person have	ving information as	probable cause.)		ein are true.
I have probable cause to believe that on	07/17/16 (Da		7620 E. 79	(Address)	in
Kansas City, Jackson (County)	Missouri	Antonio M. Mi	(Name of C	ffender(s))	
B/M, 5/26/1975 SSN (Description of Identity	y)	con	mmitted one o	or more criminal	offense(s).

The facts supporting this belief are as follows:

Date: July 29, 2016

On 07-17-2016, at approximately 0556 hours, officers were dispatched to 7620 E 79th St on a reported Ambulance in route call. Upon arrival, a deceased black male victim was located lying on the side of the road. The victim appeared to have suffered from an apparent gunshot wound to the head. His cell phone was on the ground beside him and he was found to be missing his pants.

Jackson County Medical Examiner ruled the victim's death a homicide. The victim was identified as James L. Hines B/M, 01-07-82. Detectives contacted his girlfriend who advised she had last seen him on the evening of 07/16/2016 when she dropped him off around midnight at an address on Campbell. Detectives then contacted these residents who advised the victim had been at their residence, but had left on foot at approximately 1:00 AM on 7/17/2016.

On 07-19-2016, Detectives were contacted by a witness who advised she had an acquaintance by the name of Antonio Miles who use to work for her at a previously owned business. On 7/17/2016 at approximately 0800 hours, Miles showed up at her current employer in Liberty, Mo. Miles was extremely intoxicated and the witness could smell the odor of Formaldehyde or PCP on his person. Miles was agitated and said to the witness "I did it, I did it, I had to do it." The witness asked, "You had to do what?" Miles replied, "I had to kill him." Miles told the witness that he had killed "James, Erica's Dude.", because he had been "getting on his nerves." Miles told the witness he picked the victim up in his vehicle and the two drove to the area of Swope Park. He told the victim, "Let's get out of the car and smoke a dip." Detectives knew the term "dip" to commonly be used to describe PCP. Miles advised he and the victim got out of the car and Miles shot the victim. The witness stated that Miles pointed his finger just under his chin as if he had shot the victim in the head. Miles advised "That's what I do, I "park people". The witness believed this meant to kill people. Miles told the witness that he had left the victim's phone at the scene, but had taken the victim's pants from him and had tossed them in a carwash off of Troost.

Page 1 of 3

Form 50 P.D. (Rev. 9-2008)

# PROBABLE CAUSE STATEMENT FORM

<b>CRN</b>	16	-05	1	52	5
CIVIN	$-1$ $\cup$	ייטיי	1	~~	J

The witness advised that she was uncomfortable with Miles behavior so she attempted to distract him by asking him to leave and go get her a soda. A short time later, she walked outside of her office to see Miles' beside his vehicle which she identified as a dark colored Chevy Blazer. Miles had paper towels and a cup of an unknown type liquid and was washing what appeared to be a large amount of blood off the passenger headlight area of the vehicle.

Miles told the witness that prior to contacting her, he had gone to her house where he woke the witness's husband and asked for a change of clothes. Miles told the witness he took the clothes he was wearing during the homicide and put them in a trash bag provided by the witness's husband. He stated he threw the clothes in a dumpster behind the witness's prior owned business, Down South Chicken Shack, in Liberty, Mo.

Detectives contacted the witness's husband who stated that Miles came to his residence on 07-17-2016, at approximately 0700 hours and asked for a change of clothes. Miles told to the witness that he had killed someone and he was wet and needed a change of clothes. Detectives know the term "wet" is a term used to describe a person who is high on PCP. The witness recalled Miles was wearing blue Jordon Tennis Shoes and a grey tank top. The witness provided Miles with a white plastic kitchen trash bag. The witness provided Miles with a change of clothing and observed Miles place the clothes he was previously wearing, to include the blue Jordon Tennis Shoes in the trash bag.

Detectives responded to the Down South Chicken Shack, to the dumpster behind the closed business. A white trash bag was located in the dumpster that contained a white towel, grey tank top, a pair of blue jeans shorts and blue Jordon tennis shoes. Apparent blood could be seen on the blue Jordon tennis shoes.

Detectives found that the victim has been connected to Miles in previous unrelated offence reports. Furthermore the victim had several reports where he was associated with Erica Miles who is the sister to Antonio Miles.

Kansas City, Missouri Police Crime Lab completed testing on the clothing found in the dumpster and found the victim to be the source of the blood on the shorts and a CODIS hit was received on Antonio Miles DNA on the interior of the grey tank top.

On 7/29/2016 Detectives contacted Antonio Miles and after advising him of his Miranda Rights, Miles invoked his rights and refused to talk to detectives.

## PROBABLE CAUSE STATEMENT FORM

CRN 16-051525

Printed Name	Ray	H. Leno	ir Sr.	Signature		<u>L</u> .
The Court finds	s probable cau	use and directs	the issuance	of a warrant t	his day of _	•
			Jud	ge		
	Circuit C	ourt of		Cour	nty, State of Missouri	1.