

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

Police# 17-027301
Prosecutor# 095439008
1716-CR01720
OCN# C0054739

AMENDED COMPLAINT

STATE OF MISSOURI

vs.

**John L. Williamson
810 N. Montgall
Kansas City, MO 64120
DOB: 10/30/1986; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. 565.020 - Violation Of Order Of Protection For Adult - 1st Offense (455.085-002Y20095016.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 455.010 and 455.085, RSMo, committed the **Class A Misdemeanor of Violation of Order of Protection**, punishable upon conviction under Sections 455.085, 558.002 and 558.011 in that on or about April 16, 2017, the defendant, having knowledge of an order of the Circuit Court of Jackson County that prohibited the defendant from possessing firearms, knowingly violated the terms and conditions of the order by being in possession of a firearm.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count II. Murder 2nd Degree (565.021-001Y19840902.0)

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 on or about April 16, 2017, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Robert A. Witmer, caused the death of Robert A. Witmer 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 III. Armed Criminal Action (571.015-001Y19755213.0)

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 April 16, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count Two, 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 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 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.

THE STATE OF MISSOURI

vs.

John L. Williamson

/s/Jordan R. Bergus

Jordan R. Bergus (#64729)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Floor
Kansas City, Missouri 64106
(816) 881-3319
jbergus@jacksongov.org

WITNESSES:

DET Selvir Abidovic, 1125 Locust, Kansas City, MO 64106
PO Nathan Anderson, 1125 Locust, Kansas City, MO 64106
PO Daniel J. Bartlett, 2640 Prospect Ave., Kansas City, MO 64106
DET Joe A. Nelson, 1125 Locust, Kansas City, MO 64106
DET Kimberlee Jo Rice, 1125 Locust, Kansas City, MO 64106
DET Philip A. Sipple, 1125 Locust, Kansas City, MO 64106
DET Daniel G. Thomas, 1125 Locust, Kansas City, MO 64106

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██████████ Wohlleber, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 4/17/2017

CRN: 17-27301

I, Det. Selvir Abidovic #5569 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 4/16/2017, at 2605 Nicholson Ave in
(Date) (Address)

Kansas City, Jackson Missouri John L Williamson
(County) (Name of Offender(s))

W/M 10/30/1986 SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 4/16/2017 at approximately 1642 hours, officers of the Kansas City Missouri Police Department were dispatched to **2605 Nicholson Ave, Jackson County, Kansas City, Missouri** on a reported shooting.

The officers located the victim, suffering from a gunshot wound to the abdomen, lying on the sidewalk in front of 2607 Nicholson Ave. The victim told officers that "**John Lynn Williamson**" shot him. The victim pointed to the south and stated that **Williamson** lives in "In an RV down the alley".

Officers responded down the alley from the scene when they discovered a white in color shed in the backyard of 734 N. Prospect Ave. As officers were going around the shed, they observed a window with a piece of wood leaning against it. As the officers attempted to move the wood blocking the window, they heard an unknown male's voice ask, "who is it?" Officers identified themselves and **Williamson** (later identified as John L. **Williamson W/M 10-30-1986**) identified himself. Officers began to give verbal commands to **Williamson** to put his hands in the air and exit the shed. **Williamson** advised he would put his hands up but he would not exit the shed. Officers could not observe **Williamson** so they moved a blanket and they saw **Williamson** sitting in a chair with hands in the air. Another officer moved to the front door of the shed and it was unlocked. As the officer opened the door, he observed a handgun on the chair where **Williamson** was sitting.

Detectives received a Search Warrant and it was served upon the shed. **Williamson** was taken into custody at 1916hrs.

A Taurus .357 Magnum revolver was recovered from the seat cushion where **Williamson** was sitting. The .357 serial # was DS230247 and it was loaded with 6 rounds, 2 which were spent.

It was determined **Williamson** had a Full Order of Protection filed against him on March 1, 2017. As one of the conditions of the Full Order of Protection, **Williamson** is not allowed to be in possession or the presence of a firearm. Additionally, **Williamson** had notice of the Full Order of Protection. Accordingly, Federal law states **Williamson** is not allowed to possess a firearm.

PROBABLE CAUSE STATEMENT FORM

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A Witness was contacted and stated the Victim and **Williamson** were involved in a physical altercation and the witness had broken up the fight multiple times at which time the Victim picked up a rock and said "I'm going to bash your fuckin' head in" and **Williamson** said "I'm takin' your balls off and shoots the Victim.

Williamson was read the Miranda Waiver and he requested a lawyer.

Printed Name Det. Abidovic #5569

Signature

 #5569

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

Judge

Circuit Court of _____ County, State of Missouri.