

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

POLICE NO. :	17-031032
PROSECUTOR NO. :	095441200

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
ANTON L. HUNTER)	
10505 E. 42nd St.,)	CASE NO. 1716-CR
Kansas City, MO - 64133)	DIVISION
DOB: 07/21/1998)	
Race/Sex: B/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

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 on or about April 30, 2017, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Isabell Addison caused the death of Isabell Addison by shooting her.

OR IN THE ALTERNATIVE

Count I. Murder 2nd Degree (565.021-003Y19840999.0)

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 April 30, 2017, in the County of Jackson, State of Missouri, Isabell Addison was killed by being shot as a result of the perpetration of the **Class A Felony of Unlawful Use of A Weapon** under Section 571.030, RSMo committed by the defendant on or about April 30, 2017, in the County of Jackson, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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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 (571.015-001Y19755213.0)

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 30, 2017, 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 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.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20145213.0)

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 571.030.1(9), RSMo, committed the **Class A Felony of Unlawful Use of a Weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about April 30, 2017, at Blue Parkway and Cleveland Ave., in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a black Hyundai Sonata, a motor vehicle, and, as a result of the above described conduct, Isabell Addison suffered injury or death.

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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 IV. 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 30, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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 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.

Count V. Failure To Report A Shooting - 1st Offense (577.068-002Y20174812.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.068, RSMo, committed the **Class A Misdemeanor of Failure to Report a Shooting**, punishable upon conviction under Sections 577.068, 558.011 and 560.016, RSMo, in that on or about April 30, 2017, in the County of Jackson, State of Missouri, the defendant while in possession of a firearm discharged such firearm causing the death of Isabell Addison and that thereafter, the defendant, knowing that he had caused injury to or the death of Isabell Addison, left the area where the firearm was discharged without giving his name and address to a law enforcement officer or to the nearest police station.

PROBABLE CAUSE STATEMENT FORM

Date: 05-05-2017

CRN: 17-031032

I, Det. Daniel W. Frazier #5180, 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 04-30-2017, at Blue Pkwy and Cleveland Av in
(Date) (Address)

Kansas City, Jackson Missouri Anton Hunter
(County) (Name of Offender(s))

B/M 07-21-1998 SSN [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 04/30/17 at approximately 2119 hrs, officers from the Kansas City Missouri Police Dept. were dispatched to Swope Parkway and Benton Blvd., Kansas City, Jackson County, Missouri, to investigate a reported Injury Vehicular accident. Prior to their arrival, the call was upgraded to a shooting. Upon arrival officers contacted Kansas City Fire Department personnel who had already arrived and advised that the shooting scene was located just east of the intersection. They also advised that the victim was deceased from apparent gunshot wounds and still at the scene. The Jackson County Medical Examiner's Office ruled the death a homicide.

A witness was contacted at the scene and advised they were with the victim when they were shot. The witness advised that the victim was driving the vehicle they were riding in. When they stopped for the red traffic signal at the intersection of Blue Pkwy and Cleveland Av. the suspect vehicle pulled up beside them and the shooter began to shoot into the driver side of their vehicle. The witness advised that the shooter fired from the front passenger side of the suspect vehicle. The witness observed the suspect vehicle driving away going westbound on Blue Pkwy/Swope Pkwy and Cleveland Av from the scene at a high rate of speed. Shortly afterwards, the witness observed the suspect vehicle collide with another vehicle at the intersection of Swope Pkwy and Benton Blvd.

Another witness was contacted at the scene and advised that he was involved in an accident with a vehicle at Swope Pkwy. and Benton Blvd. He described the vehicle that collided with his as a black car and he observed a black female driver and a black male passenger exit the black car and run away going north on Benton Blvd. toward Brush Creek. The black female driver returned to the scene of the crash and told him that she was sorry for running into him. She was taken into custody by officers who responded to the scene. She was identified as [REDACTED], bf, 02/20/98. Her vehicle is a black Hyundai Sonata bearing Kansas license 089HMMW.

[REDACTED] was transported to Police Headquarters for questioning. After waving her Miranda Rights she admitted she had been driving her vehicle westbound on Swope Parkway and stopped at the light at Swope Parkway and Cleveland. Her boyfriend **Anton Hunter B/M 7/21/98** whom she had been dating for one year was in the front passenger seat of the vehicle. While sitting at the stop light she heard multiple gunshots. She looked over and saw Hunter shooting out of the vehicle towards the vehicle stopped next to them. She immediately drove off westbound fearing whoever Hunter was shooting at would shoot back. [REDACTED] ran the red light at Benton striking another vehicle that had the right-a-way. Hunter ran from the scene northbound along Benton Blvd. While [REDACTED] stayed until police arrived. [REDACTED] explained to

PROBABLE CAUSE STATEMENT FORM

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Detectives that prior to the shooting Hunter and she had a small verbal argument regarding French fries they had just purchased. [REDACTED] could not explain why the shooting occurred. [REDACTED] knew Hunter to carry a firearm and advised he would put it under the seat he was sitting in when he traveled in vehicles.

Investigation at the scene revealed four spent shell casings in the westbound lanes of Blue Pkwy and Cleveland Av. Detectives also observed broken glass in the roadway. The victim's driver's side window was shattered out and numerous apparent bullet holes were observed in the door. A search of [REDACTED] Black Hyundai revealed five additional spent shell casings inside of the vehicle. The caliber matched the spent casings from the scene. Detectives also noted that the front passenger window was broken out. Additionally a temporary license of Hunters was located in the glove box of the car.

A search for Hunter has been met with negative results. Hunter's phone has been shut off since the homicide.

Printed Name Det. Daniel W. Frazier #5180 Signature /S/ Det. Daniel W. Frazier #5180

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

Judge

Circuit Court of _____ County, State of Missouri.