

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

<b>POLICE NO. :</b>	18-000195
<b>PROSECUTOR NO. :</b>	095443330

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>MICHAEL G. AUGUSTINE</b>	)	
<b>8815 Richards Dr.,</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO - 64133</b>	)	<b>DIVISION</b>
<b>DOB: 08/10/1974</b>	)	
<b>Race/Sex: W/M;</b>	)	
<b>SSN: XXX-XX-████</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840999.0)**

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 January 19, 2018, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Clifton D. King by choking him.

The range of 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.

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

**State vs. Michael G. Augustine**

by,

/s/ Brady X. Twenter

Brady X. Twenter (#49380)  
Assistant Prosecuting Attorney  
415 East 12th Street 11th Floor  
Kansas City, MO - 64106  
BTwenter@jacksongov.org

**WITNESSES:**

SGT Chris Shrout, 10000 E. 59th Street, Raytown, MO - 64133  
SGT Jared Rogers, 10000 E. 59th Street, Raytown, MO - 64133  
DET Bradley Schwarz, 10000 E. 59th Street, Raytown, MO - 64133  
DET Nancy Wasko, 10000 E. 59th Street, Raytown, MO - 64133  
PO Thomas Greer, 10000 E. 59th Street, Raytown, MO - 64133  
PO Joseph Holt, 10000 E. 59th Street, Raytown, MO - 64133  
PO Larry Jackson, 10000 E. 59th Street, Raytown, MO - 64133  
PO Erica Weighofer, 10000 E. 59th St., Raytown, MO - 64133  
PO Joe Wise, 10000 E. 59th St., Raytown, MO - 64133  
PO Lonnie Wood, 10000 E. 59th Street, Raytown, MO - 64133

Probable Cause Statement Form

Date: 01-20-2018

Report # 18-0195

I, Detective Greer, 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 1-19-2018, at 9009 Richards Dr. Raytown, Jackson County, MO, 64133, Michael G. Augustine, a white male born 08-10-1974, SSN- [REDACTED] committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 01-19-2018 at 2215 hour, officers were dispatched to 8815 Richards Dr. Raytown, MO 64133 in regard to an intruder in the home. The calling party was identified as Michael Augustine. Officers responded to the residence and found that there was no one there. Augustine advised dispatch that he had the intruder pinned down in the front yard of his residence in a choke hold.

Officers searched the area and found Augustine in the front yard of 9009 Richards Dr. Raytown, MO 64133. Augustine was found on top of a black male, later identified as Clifton King who is the resident of 9009 Richards Dr. Raytown, MO 64133. As P.O. Joe Wise checked for a pulse of King he found that he did not have one. Augustine spontaneously uttered "That's right. I fucked him up!" EMS was notified and responded to the scene. Officers performed life-saving measures until EMS arrived where King was transported to Research Medical Center.

Officer Lonnie Wood was contacted at the scene by [REDACTED], a neighbor of King [REDACTED] asked if King was alright. Smith stated he did not know his neighbor's name but described him as a large black male. P.O. Wood asked [REDACTED] if the black male lying in the front yard of 9009 Richards Dr. looked like his neighbor. [REDACTED] advised it did.

Officers at the scene believed Augustine was intoxicated. He had the strong odor of an alcoholic beverage and slurred incoherent speech. Augustine was taken into custody and transported to Raytown Police Headquarters.

After King was transported by EMS to the Research Medical Center, he was pronounced dead at 2339 hours.

Augustine invoked his right to counsel and would not give a statement. Augustine's listed address in DOR is 8815 Richards Dr. Raytown, MO 64133.

Name Detective T. Greer Signature: /s/ Thomas Greer