


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>POLICE NO. :</b>	18-025016
<b>PROSECUTOR NO. :</b>	095444988
<b>OCN:</b>	an017394

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>CURTIS V. LEE</b>	)	
<b>813 Wheeling</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64125</b>	)	<b>DIVISION</b>
<b>DOB: 04/30/1978</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Murder 1st Degree (565.020-001Y19840902.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about April 12, 2018, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Charles Burton by stabbing him..

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years 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 April 12, 2018, in the County of Jackson, State of

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Missouri, the defendant committed the felony of Murder in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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. 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,

*/s/ Hallie L. Williams*  
Hallie L. Williams (#66333)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-4488  
hwilliams@jacksongov.org

**WITNESSES:**

1. PO Dallas Burnette, 223 N. Memorial Drive, Independence, MO 64050

■ [REDACTED]  
■ [REDACTED]  
■ [REDACTED]

5. DET Brian Draveling, 223 N. Memorial Drive, Independence, MO 64050


■ [REDACTED]  
■ [REDACTED]

8. PO Brian Hanrahan, 223 N. Memorial Drive, Independence, MO 64050

9. PO Roger Lane, 223 N. Memorial Drive, Independence, MO 64050

■ [REDACTED]  
■ [REDACTED]

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12. PO Darren McIntosh, 223 N. Memorial Drive, Independence, MO 64050
  13. DET Scott Mckee, 223 N. Memorial Drive, Independence, MO 64050
  14. PO Douglas Miller, 223 N. Memorial Drive, Independence, MO 64050
  15. CST Jason Myers, 223 N. Memorial Drive, Independence, MO 64050
  16. CST Jacqueline Pace, 223 N. Memorial Drive, Independence, MO 64050
  17. CST Kyla Walje, 223 N. Memorial Drive, Independence, MO 64050
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## PROBABLE CAUSE STATEMENT

Date: 4/12/2018

Report #: 2018-25016

I, Christopher Burris, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 4/12/2018, at approximately 0243 hours, Curtis V. Lee, (Race- Black, Sex- Male, DOB- 04/30/1978, Address-813 Wheeling Avenue, Kansas City, Missouri 64125, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 4/12/18 at 0243 hours, Officers of the Independence Police Department were dispatched to 3555 S. Lynn Court, Apartment A, Independence, Jackson County, Missouri 64055. Dispatch received a 911 emergency call to the above address in reference to what was classified in the dispatch computer system as a "Nature Unknown."

Upon the arrival of police officers, they contacted a subject at the front door of the residence that had blood all over his hands. Officers entered the residence and located two black males deceased inside the house, with one male in each bedroom. Both deceased male subjects were found lying on the floor. The black male the officers met at the door was detained and identified as Curtis Lee. Officers secured the residence and waited for the arrival of detectives. According to responding officers it appeared the victims might have been moved and / or repositioned.

Officer Dallas Burnette reported that after detaining Lee, he placed him in his patrol vehicle. While in the back of Officer Burnette's patrol vehicle, Mr. Lee made numerous spontaneous utterances, including that the two persons in his apartment were his father and his uncle, that "she did it", and that he had spent time in jail previously for killing his other uncle out of self defense.

Patrol officers began to canvas the apartment building. At 3555 S Lynn Court, Apartment B, officers contacted [REDACTED] and the renter of the apartment, [REDACTED]. [REDACTED] initially stated he and his "girlfriend" [REDACTED] had been asleep and didn't know anything about what had occurred in the upstairs Apartment #A. However, after [REDACTED] was hesitant to properly spell her name, officers were able to get [REDACTED] to state [REDACTED] Clyde Burtin, was the renter of Apartment #A and he resided in that apartment with his brother, [REDACTED]. [REDACTED] also stated Charles' son [REDACTED] had been staying in the apartment since at least last night (Tuesday 04/10/18). [REDACTED] remained evasive until eventually stating [REDACTED] and she had been awakened by Lee calling [REDACTED]' cell phone to speak with [REDACTED]. [REDACTED] advised Lee was asking if either she or Williams had seen his girlfriend and they stated they had not. [REDACTED] added that Lee told her then that he had messed up bad, but that was all he said before hanging up. [REDACTED] was advised her father and uncle were deceased inside the apartment. [REDACTED] began to grieve wildly, repeatedly shouting, "That nigger killed them!" [REDACTED] continued this rant, using the name Lee several times when she stated "Curtis killed them! How could he kill his own father?"

Lee was subsequently transported to the Detention Unit at the Independence Police Department, where he was held on an outstanding arrest warrant and placed on an investigative hold in reference to this case.

A search warrant for the residence was applied for and obtained via the Jackson County 16<sup>th</sup> Judicial Circuit Court. Upon executing said search warrant on the residence, investigators found both males in the residence.

They were identified as Clyde and Charles Burtin (brothers). Clyde was found on the floor in his bedroom and Charles on the floor in his bedroom. Both victims appeared to have stab wounds to the upper torso's of their bodies. A large knife which had apparent dried blood on the blade was located in the living room. Neither victim had any apparent defensive wound. There was apparent blood staining (some dried / some still drying) found around the pillows and headboard end of the mattress in both rooms.

Lee was questioned in reference to this case. Questioning took place after Lee was read his Miranda rights. Lee advised that prior to the police being called his father and uncles were arguing. Lee admitted that he had smoked PCP with his uncle. Lee advised he was in the living room, when he observed his father come in. Lee advised his father retrieved a knife belonging to him (Lee), the same one recovered from the scene with apparent blood on it. Lee advised his father stabbed his uncle in his uncle's bedroom. Lee advised he went into his uncle's room, where he pulled the knife out of his uncle. Lee advised his father asked him to come into his room. Lee advised he went to his father's bedroom and his father placed the knife on the bed. Lee advised the lights were out and he and his father smoked a cigarette. Lee advised his father stated "it's going to be you or me." Lee advised he grabbed the knife and stabbed his father. Lee was asked why after he grabbed the knife, he did not just leave. Lee advised he did not think of that.

Detective Christopher Burris # 1401

/S/ Christopher Burris

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Print Name

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Signature