

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

<b>POLICE NO. :</b>	KC21063485
<b>PROSECUTOR NO. :</b>	095466352
<b>OCN:</b>	HS028822

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>PAUL E JOHNSON</b>	)	
<b>335 Lawn Ave.</b>	)	<b>CASE NO. 2116-CR</b>
<b>Kansas City, MO 64124</b>	)	<b>DIVISION</b>
<b>DOB: 01/14/1965</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted  
Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-  
003Y20200999.0)**

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 September 20, 2021, in the County of Jackson, State of Missouri, Annamarie Becchina was killed by being shot as a result of the perpetration of the class D felony of assault in the second degree under Section 565.052, RSMo, and as a result of the perpetration of the class E felony of exhibiting under Section 571.030, RSMo, committed by the defendant on or about September 20, 2021, 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.

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.

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**Count II. Armed Criminal Action (571.015-001Y20205213.0)**

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 September 20, 2021, 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. Assault - 2nd Degree (565.052-001Y20201399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 20, 2021, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED] by poking him with a firearm and the firearm discharging.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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.

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**Count IV. Armed Criminal Action (571.015-001Y20205213.0)**

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 September 20, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the second degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class E felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 20, 2021, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a Harrington & Richardson Model 176 10 gauge shotgun, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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

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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.

**Count VI. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about September 20, 2021, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Harrington & Richardson Model 176 10 gauge shotgun, a firearm, and on September 27, 2006, the defendant was convicted of the felony of possession of a controlled substance in the Circuit Court of Jackson County, Missouri.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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 statement(s) of facts filed contemporaneously herewith, 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/ Paul M. Conklin III  
Paul M. Conklin III (#66958)  
Assistant Prosecuting Attorney  
415 E. 12th Street  
11th Floor  
Kansas City, MO 64106  
(816) 881-3824  
PTConklin@jacksongov.org

**WITNESSES:**

1. [REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED] . Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Scott M. Emery, 1125 Locust, Kansas City, MO 64106

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4. DET Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106

5. PO J. Hand, 1125 Locust, Kansas City, MO 64106

6. [REDACTED]

[REDACTED]

[REDACTED]

64106

8. DET Scott P. Mullen, 1125 Locust, Kansas City, MO 64106

9. DET Hobart D. Price, 1125 Locust, Kansas City, MO 64106

10. [REDACTED]

64106

11. DET Bradley N. Thomas, 1125 Locust, Kansas City, MO 64106

12. DET Daniel G Thomas, 1125 Locust, Kansas City, MO 64106

13. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 09/21/2021

CRN: 21-063485

I, Detective Brad Thomas #3971, 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 09/20/2021, at 335 Lawn Ave in  
(Date) (Address)

Kansas City, Jackson Missouri Johnson, Paul E  
(County) (Name of Offender(s))

W/M, 01/14/1965, 5'10/150, Bn/Gn committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 09/21/2021 at 10:47 p.m., officers of the Kansas City, Missouri Police Department were dispatched to 329 Lawn in regard to a shooting. Upon arrival it was determined the shooting had occurred at 335 Lawn Ave., Kansas City, Jackson County, Missouri. Victim 1, Annamarie Becchina (AB) was pronounced deceased and a murder investigation was initiated.

Upon arrival officers located a male victim [REDACTED] in the front yard with a gunshot wound to the shoulder. The officers attention was directed to the rear of the address where they were told the suspect, **Paul Johnson** was located. Officers observed the female victim (AB) laying on the ground and **Johnson** trying to perform life saving measures. AB appeared to be suffering from a gunshot wound to the chest and had no signs of life. **Johnson** told officers the gun was in the garage and the shooting had been an accident. Officers arrested **Johnson**.

Officers conducted a protective sweep of the interior of the garage and living area within the garage structure. Officers discovered a firearm in the living area of the structure. Officers identified 4 witnesses at the scene and detained them for further questioning by detectives.

[REDACTED] was briefly questioned at the hospital by detectives. [REDACTED] stated **Paul Johnson** shot him.

Witness 1 ([REDACTED]) stated to detectives she went to the address with [REDACTED] and AB on the way to a casino. [REDACTED] said there was an argument between the victim's and the suspect, whom she did not know. The suspect (**Johnson**) fired a single shot which struck both victims. She described the suspect as being an older white Male wearing a black t-shirt.

Witness 2 [REDACTED] stated the suspect, **Paul Johnson** was assisting her in picking up some items. They went to 335 Lawn and sometime afterward AB and [REDACTED] showed up. **Johnson** and [REDACTED] got in an argument about some

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item(s) that were missing. During the argument [redacted] pushed **Johnson** [redacted] then started to leave and the dogs that were in the yard started to fight [redacted] was trying to stop the fight when [redacted] saw **Johnson** walk up to [redacted] with a shotgun and shoot [redacted].

Witness 3 [redacted] stated to detectives she resides at 335 Lawn Ave. She was outside and had a clear view of what occurred. [redacted] said there was an argument between [redacted] and **Johnson** about some bags. During the argument [redacted] and **Johnson** were in and out of the garage a couple times. [redacted] said **Johnson** resides inside the garage behind 335 Lawn Ave. [redacted] started yelling at **Johnson** when they were outside the garage and wanting **Johnson** to come fight him. [redacted] heard a gunshot but did not see who fired the shot. Afterwards she observed [redacted] run to the front yard saying he was shot and AB laying on the ground outside the garage bleeding. [redacted] said **Johnson** tried performing life saving measures on AB until police arrived.

Witness 4 [redacted] stated to detectives she did not know anyone involved and was simply walking past 335 Lawn Ave when she heard yelling. [redacted] said as she got closer the arguing got louder. [redacted] started recording events with her cell phone. When she was next to 335 Lawn she heard 2 loud gunshots. After the gunshots she saw a white male who she did not know run to the front of the address. [redacted] could tell he was injured. Two white females came to the front of the address and were trying to help the white male. [redacted] said she called 911. [redacted] said she heard the two white females say the person with the gun was behind the address.

**Johnson** was arrested and transported to Police Headquarters for questioning. **Johnson** was advised of his rights via the Miranda Warning and Waiver card. **Johnson** said he and [redacted] were arguing during which Johnson procured a firearm (shotgun) from the garage. **Johnson** said he was "poking" at [redacted] with the shotgun and it went off unexpectedly. [redacted] was struck by gunfire and so was AB. **Johnson** said he is a convicted felon and has ingested methamphetamine every day for the last four years.

A search warrant was obtained for the premises. A search of the interior of the garage was done and a Harrington & Richardson Model 176 10 gauge magnum single shot shotgun was recovered. A spent hull was observed in the chamber of the weapon. On the driveway just outside the garage 5 small metallic BB type objects were recovered. In close proximity and amongst AB's clothing 3 baggies containing a rock like substance were located.

**Johnson** was found guilty of Receiving Stolen Property (C Felony, 04CR20498701), Possession of a Controlled Substance (C felony, 0516CR0642101) on September 27, 2006, and is labeled as a Persistent Offender for DWI.

Printed Name Det Brad Thomas Signature /s/ Det Brad Thomas 3971

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

\_\_\_\_\_

**PROBABLE CAUSE STATEMENT FORM**

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Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.