

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

FILED  
CIRCUIT COURT  
JACKSON CO., MO.-1  
16 JUN 15 AM 11:03

Police# 16-004764  
Prosecutor# 095432823  
1616-CR 02186 *by*  
OCN# bv006596

**COMPLAINT**

**STATE OF MISSOURI**

vs.

**Robert Lee Haynes  
8424 Russell Rd  
Oak Grove, MO 64075  
DOB: 04/08/1972; Race/Sex: W/M;**

**Defendant.**

**Count I. Murder 2nd Degree (565.021-001Y19840999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 June 11, 2016, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to caused the death of 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 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 June 11, 2016, 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 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.

**Robert Lee Haynes**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,



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Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, Missouri 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

DEP Dustin Atkins , 3310 NE Rennau, Lees Summit, MO 64064

DET Pennv Cole , 3310 NE Rennau Drive, Lees Summit, MO 64064

DEP Cody Cox , 3310 NE Rennau Dr, Lees Summit, MO 64064

DET Terry Edwards , 3310 NE Rennau, Lees Summit, MO 64064

DEP Tyler Naudet , 4001 NE Lakewood Way, Lees Summit, MO 64064-1703

SGT John Payne , 3310 NE Rennau Drive, Lees Summit, MO 64064

# STATEMENT OF PROBABLE CAUSE

JCSD CASE NUMBER 16-04764

DATE 06/15/2016

FILED  
CLERK OF COURT  
JACKSON COUNTY, MO  
BY \_\_\_\_\_  
84

16 JUN 15 AM 11:03

I, Detective Scott Collins, a Detective with the Jackson County, Missouri Sheriff's Office, upon my oath, under penalties of perjury, state as follows:

1) I have probable cause to believe that **Robert Lee Haynes** (w/m, 04/08/1972, Russell Road, Oak Grove, Jackson County, MO 64075) committed one or more criminal offenses.

2) The facts supporting this belief are as follows:

On 06-11-16 at about 2206 hours, Deputy C. Cox was dispatched to 8424 S. Russel Road, Oak Grove Missouri, unincorporated Jackson County, in regard to a person with a gunshot wound to the head.

Upon arrival Deputy Cox was waved down by two parties at the end of the driveway. Deputy Cox located (w/m, 03/14/89) lying facedown on the gravel driveway. appeared to have a gun shot would to back of his head near his left ear. EMS arrived on scene and was transported to Centerpoint hospital. was later pronounced "brain dead" and was removed off of life support on 06-14-2016 and pronounced dead at 2241 hours.

Deputy Naudet secured a Ruger revolver laying approximately five feet to the right of on the gravel driveway. When the firearm, a Ruger .22 revolver serial number 516195, was cleared three spent shell casing were removed from the revolver. The firearm and casings were secured and transported to JACO headquarters.

(w/f, 10/09/95) was on scene upon arrival of Deputies. stated that she was ex-girlfriend. She had been at the residence when arrived and wanted property he accused her of stealing. advised that at some time after his arrival, produced a firearm and shot two rounds into the ground, and then pointed the gun at her. stated she turned around and heard one more shot. She turned back around and observed laying face down.

Robert L. Haynes (w/m, 04/08/72), the resident, was also on scene. He advised that he allowed to stay at the residence. Haynes stated that he observed a car pull up to the end of the driveway and got out. Haynes advised that then walked down the driveway and began yelling at in regards to a Bluetooth speaker. Haynes stated during the argument pulled out a gun and shot two rounds into the ground. The vehicle in the driveway left at which time waved the gun around and then shot himself in the head. Haynes advised that made no threats of killing himself.

On 06-13-2016, I called mother, (w/f, 07/25/59) advised that her son was right handed. On that same day at 0930 hours, Det. Edwards and Sgt. Payne responded to Centerpoint Hospital where they contacted hospital physicians and Dr. Tareau of the Jackson County Medical Examiners office, and he advised that it was "highly unlikely" that would have been able to produce such a self inflicted wound.

On 06/13/2016 at 1415 hours, in a video/audio recorded statement, was contacted at Jackson County Headquarters. advised that Haynes had shot in the head and had killed him on Saturday night the 11<sup>th</sup> of June. had contacted earlier in the day and advised that he needed to go to 8424 S. Russell Road to retrieve his property. drove to the residence at 8424 Russell Road. and engaged in a verbal argument outside of the residence at which time Haynes had been outside as well. Haynes entered the residence and returned with a firearm. stated that he saw a flash of light from the firearm as Haynes shot one round into the air approximately five feet from Haynes then moved the firearm towards head and shot in the head. Haynes then pointed the firearm at who heard another shot and left in fear of his own life.

On 06/14/2016 at approximately 0715 hours, (w/m, 01/26/1989) spoke with me at Jackson County Sheriff's office Headquarters. in a video and audio statement, said he was at Haynes residence working on his truck when called him to see if was there and he told that was there. said showed up with in one vehicle, and and showed up together in a separate vehicle. said he did want to be a part of what was going on, so he went to the barn so he would not see anything. said he heard and having a verbal argument, at which point he looked out from the barn from under the barn door, and then Haynes came out of the house and told them to chill out.

said Haynes went into the house, returned from inside the residence and shot a warning shot, at which point saw the gun and flipped out. said Haynes was putting the gun in the front of his waistband, when pushed Haynes arm and gun went off, shooting in the head. said was standing to the right of Haynes and to the left of said he then exited the barn and saw on the ground and Haynes went and put the gun in the house. said was screaming and the other parties there "scattered".

described the gun as "a 22 old war pistol". advised that he has seen the gun before and it was "Bob's" (Robert Haynes) gun. made the statement that "Bob had no business going and getting it", referring to the gun.

On 06/14/2016 at 1135 hours, I received a phone call from (b/m 08-17-1989) stating he would meet me at the Dennys in Blue Springs to talk about the shooting on 06-11-2016.

I met a the Denny's at 7 highway and I-70, and in a audio recording, White said he followed to Haynes residence, where and started arguing about his property and "an old dude"(Haynes) was standing there with and he walked back into the residence. said then walked into the residence and they exited the residence. said he saw Haynes with a firearm and was within 3' feet when he shot at said tried to knock the gun out of the Haynes hand, but Haynes shot again, hitting in the left side of his head. said Haynes then turned to them and they got in the car and drove away. said he did hear some more shots, but did not know what Haynes was shooting at.

On 06-16-2014 at 1350 hours, (w/f 04-04-2000), spoke with me at the Sheriff Office in a video and audio recording. stated she, and another guy who she did not know, went to Hayne's residence so could talk with about the property she took of his. and started yelling at each other and then Haynes walked out of the residence with a gun that she could see in his hand. said it looked like Haynes pointed the gun at and shot and missed and then shot again and shot in the head. said Haynes turned in their direction and they got in their car and drove away.

On 06-14-2016, Robert L. Haynes (w/m 04-08-1972) was located in the parking lot of Kobe Japanese Steak House at 19800 E Valley View parkway in Independence, MO. Deputies took him into custody without incident, for active Jackson County warrants he had. Haynes was transported to the Sheriff Office; where he was read his Miranda rights and he stated he wanted to talk to his lawyer and did not want to talk.

Det. GLO # 84

Detective Scott Collins  
Jackson County, Missouri Sheriff's Department

The court finds probable cause

Judge

