

COPY

IN THE ASSOCIATE CIRCUIT COURT OF CASS COUNTY, MISSOURI  
SEVENTEENTH JUDICIAL CIRCUIT

STATE OF MISSOURI )  
 )  
 Plaintiff, )  
 )  
 vs. ) Case No.  
 ) PA File No. 037058097  
 MICHAEL S ADAMS JR ) OCN  
 )  
 Defendant. )

FELONY COMPLAINT

STATE OF MISSOURI )  
 ) ss.  
 COUNTY OF CASS )

The Prosecuting Attorney of the County of Cass, State of Missouri, upon information and belief, charges that the defendant, in violation of:

**Count: 1 MURDER 2ND DEGREE 1003102.0**

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 July 14th, 2009, in the County of Cass, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Amber Hartwig, caused the death of Amber Hartwig by shooting her.

**Count: 2 ARMED CRIMINAL ACTION 3101099.0**

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 July 14th, 2009, in the county of Cass, 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 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.

IN THE CIRCUIT COURT OF CASS COUNTY, MISSOURI  
SEVENTEENTH JUDICIAL CIRCUIT

STATE OF MISSOURI	)
	)
Plaintiff,	)
	) Case No.
v.	) OCN:
	)
	)
MICHEAL STEVEN ADAMS JR	)
	)
Defendant.	)

**PROBABLE CAUSE STATEMENT**

STATE OF MISSOURI	)
	) ss.
COUNTY OF CASS	)

I, Lance Crull, 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 07/14/2009, at 411 Robie dr., Belton, Cass County, Missouri, Micheal S. Adams Jr. w/m 07/13/1972, committed one or more criminal offenses.

2. The facts supporting this belief are as follows: On the above date at the above location the defendant shot the victim in the head using a 45 caliber hand gun killing her. The defendant and the victim have lived together for several years and have two children in common ages 18 and 10. The defendant and the victim have been arguing for an extended time. The defendant and victim as well as their two children had gone to the Hy-Vee grocery store to buy candy for the children. On the return trip home the defendant attempted to jump from the car and was restrained by the Eighteen year old daughter witness Alicia Adams dob 03/10/1991. The victim then told the kids to pack some clothes as she was leaving the defendant for the night and taking them with her. The victim asked witness Alicia Adams to call a friend to arrange for a place to stay. Upon arriving at the house the kids exited the vehicle first and went inside of the residence followed by the victim and defendant. Witness Alicia Adams advised that she and her brother were in there rooms when she heard two gun shots. She advised that she went into the kitchen and saw the victim laying on the floor and the defendant sitting on the floor smoking a cigarette. She advised that she grabbed the phone and called 911 telling the dispatcher that my dad shot my mom and she was told to get her brother and get out of the house. Upon arrival of officers they observed the victim to be deceased and the defendant to be breathing, an ambulance was called and the defendant was transported to the hospital. While en-route to the hospital the defendant kept saying that he was shot and that Amber is not dead and he wanted to die. The defendant suffered a superficial wound to the chest and was hospitalized for observation. The defendant was contacted by Sgt. Crull at the hospital and he claimed to not remember anything about what happened. The defendant was not able to answer questions about where he lived or the names of his children. No further questions were asked. Sgt

Crull contacted the Medical examiner office to determine if the victim's wounds could be self inflicted. Dr. Knight advised that the wounds were caused from a distance greater than three feet. Dr. Knight's preliminary ruling is that of a homicide. It was also determined that both the victim and defendant are right handed.

Lance Crull  
Print name

Lance Crull  
Signature

7-15-08  
Date