

IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSOURI  
ASSOCIATE JUDGE DIVISION  
45<sup>th</sup> JUDICIAL CIRCUIT

STATE OF MISSOURI, )  
Plaintiff, )  
 )  
vs. ) Case No.  
 )  
 )  
DAVIONNE MCROBERTS, ) Case No.  
Defendant. ) OCN:  
 )

**FELONY COMPLAINT**

Comes now, the Assistant Prosecuting Attorney of the County of Lincoln, State of Missouri, being duly sworn upon my oath and upon information and belief, and states that there is probable cause to believe that on or about March 20, 2023, the accused committed the following crime(s):

**COUNT I**  
**MURDER 1ST DEGREE**

The defendant, **DAVIONNE MCROBERTS**, 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 March 20, 2023, in the County of Lincoln, State of Missouri, the defendant after deliberation, knowingly caused the death of D.M. by shooting him with a firearm.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under section 565.033.

Missouri Charge Code: 565.020-001Y202009990

**COUNT II**  
**ARMED CRIMINAL ACTION**

The defendant, **DAVIONNE MCROBERTS**, in violation of Section 571.015, RSMo, committed the felony of Armed Criminal Action, punishable upon conviction under Section

571.015, RSMo, in that on or about March 20, 2023, in the county of Lincoln, State of Missouri, the defendant committed the felony of Murder in the First degree as alleged in Count 1; 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 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. 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.

Missouri Charge Code: 571.015-001Y202052990

**COUNT III**  
**MURDER 1ST DEGREE**

The defendant, **DAVIONNE MCROBERTS**, 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 March 20, 2023, in the County of Lincoln, State of Missouri, the defendant after deliberation, knowingly caused the death of K.M. by shooting her multiple times.

The offense of murder in the first degree is a class A felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under section 565.033.

Missouri Charge Code: 565.020-001Y202009990

**COUNT IV**  
**ARMED CRIMINAL ACTION**

The defendant, **DAVIONNE MCROBERTS**, in violation of Section 571.015, RSMo, committed the felony of Armed Criminal Action, punishable upon conviction under Section 571.015, RSMo, in that on or about March 20, 2023, in the county of Lincoln, State of Missouri,

the defendant committed the felony of Murder in the First degree as alleged in Count 3; 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 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.

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.

Missouri Charge Code: 571.015-001Y202052990

The facts that form the basis for this information and belief are contained in the attached statement of facts concerning this matter, which statement is made apart hereof and are submitted herewith as a basis upon which this Court may find the existence of probable cause for the issuance of the warrant.

WHEREFORE, the Assistant Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

DATED: March 24, 2023

/s/ Tamma E. Keim

---

Tamma E. Keim, Bar #62646  
Assistant Prosecuting Attorney  
P. O. Box 319  
Troy, MO 63379  
(636) 528-8571