


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

<b>POLICE NO. :</b>	18-061614
<b>PROSECUTOR NO. :</b>	095447343
<b>OCN:</b>	HS004046

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>SAMUEL J. DELOZIER</b>	)	
<b>9431 NW 68th Street</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, MO 64152</b>	)	<b>DIVISION</b>
<b>DOB: 09/18/1995</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	<b>DEFENDANT.</b>	)

**COMPLAINT**

**Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840909.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the **class C felony of involuntary manslaughter in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 11, 2018, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Thomas Colatrella by disregarding a stop sign and striking a vehicle occupied by Thomas Colatrella while driving at a high rate of speed.

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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 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.

**State vs. Samuel J. Delozier**

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/ Erin Hunt*  
Erin Hunt (#59061)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3388  
ehunt@jacksongov.org

**WITNESSES:**

1. DET Gary L. Burgess, 1125 Locust, Kansas City, MO 64106
2. Thomas Colatrella, 484 E. Main Street, Kingston, MO 64650
3. PO Karl T. Janning, 1125 Locust, Kansas City, MO 64106
4. PO John P. Mahoney, 1200 E. Linwood, Kansas City, MO 64106
5. PO Mathew Vaccaro, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08/12/2018

CRN: 18-061614

I, **Det. Gary Burgess #4441**

(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 08/11/2018, at Smart Avenue and Monroe Avenue in

Kansas City, Jackson Missouri, Samuel I Delozier W/M, (09/18/1995)  
(County) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

**Involuntary Manslaughter/Resist Arrest/Tampering**

The facts supporting this belief are as follows:

On 08/11/2018 at approximately 2123 hours, Kansas City Missouri Police Officers Mahoney and Vaccaro were on patrol in the area of Independence Avenue and Hardesty Avenue, Kansas City, Jackson County, Missouri when they observed a gray Toyota Tacoma. After receiving information in roll call earlier that day, the officers recognized the Toyota as the suspect vehicle used in an aggravated assault in which a handgun was fired from the vehicle at a citizen the night before. (KCPD CRN# 18-061417) The officers got behind the Toyota and broadcast the information over the police radio and attempted to get other vehicles in the area before they attempted to conduct a car check. After Kansas City Fire Department vehicles got behind the officers with their emergency equipment activated in the area of St. John and Van Brunt, the Toyota sped up. The officers then activated their emergency equipment and attempted to stop the Toyota, but he refused to stop. The Toyota traveled west on St. John and crossed over the centerline into the eastbound lanes in front of an eastbound motorist to pass a westbound vehicle. The Toyota sped up to approximately 75 MPH and continued west on St. John and turned south onto Monroe Avenue. An eastbound motorist on St. John had to stop to avoid being struck by the Toyota when it turned onto Monroe. The Toyota ran the stop sign at Morrell and Monroe just as there was a vehicle approaching the intersection from the east. The Toyota continued on Monroe at a high rate of speed and continued to run stop signs. After the Toyota turned west onto Anderson Avenue it turned south onto Askew, turned off its headlights and drove the wrong way on a one-way street. The Toyota continued to run stop signs and displayed no concern for the safety of others. The Toyota ran a stop sign as it turned north onto Myrtle from Garner and forced an eastbound motorist to stop to avoid being struck at the intersection. The Toyota then turned west onto Smart Avenue and traveled at a high rate of speed, ran the stop sign and struck a southbound silver Chevrolet Impala at the intersection of Smart and Monroe. The officers took the driver/defendant of the Toyota, later identified as **Samuel I Delozier (w/m, 09/18/1985)**, into custody and transported him to a police facility for processing. The driver of the Chevrolet, **Thomas M Colatrella (w/m, 05/04/1986)**, was transported to an area hospital where he later died from injuries sustained in the crash. A computer inquiry of the Toyota's VIN revealed it to be stolen from Lee's Summit, Missouri. (Lee's Summit PD CRN#18-006011)

On 08/11/2018 at 2358 hours, a Kansas City Missouri Detective read the defendant his Miranda Rights, which he stated he understood and he signed the Miranda Waiver. The defendant requested an attorney so an interview was not conducted.

PROBABLE CAUSE STATEMENT FORM

CRN 16-061614

A computer inquiry revealed the defendant to not have a valid operator's license.

Printed Name Det. Gary Burgess #4441 Signature Det. Gary Burgess #4441

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

\_\_\_\_\_  
Judge

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