

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

<b>POLICE NO. :</b>	18-066290
<b>PROSECUTOR NO. :</b>	095447713
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>KEITH A CONNER</b>	)	
<b>1028 Ridge</b>	)	<b>CASE NO. 1816-CR</b>
<b>Kansas City, KS 66102</b>	)	<b>DIVISION</b>
<b>DOB: 03/22/1988</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Tampering With Airplane/motorboat - 1st Degree (569.080-003Y20172999.)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the **class D felony of tampering in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 28, 2018, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile, to wit a blue Ford Crown Victoria owned by the Kansas City Missouri Police Department.

The range of 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 two (2) years 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 II. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20174801.)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 28, 2018, in the County of Jackson, State of Missouri, P.O. Kendall, P.O. Keller and P.O. Simbro, law enforcement officers, were attempting to make a lawful stop of defendant, and the defendant knew or reasonably should have known that the officers were making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant drove at high rates of speed, failed to yield to traffic control devices and crashed into a guard rail.

The range of 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 two (2) years 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 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 III. Property Damage 1st Degree (569.100-001Y20172903.)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the class E felony of property damage in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 28, 2018, in the County of Jackson, State of Missouri, the defendant knowingly damaged the blue Ford Crown Victoria which property was owned by Kansas City Missouri Police Department, by crashing the into the guardrail at a high rate of speed, and the damages to such property exceeded seven hundred and fifty dollars.

The range of 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 two (2) years 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 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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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.

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

*/s/ Julia A. Hamilton*  
Julia A. Hamilton (#45429)  
Assistant Prosecuting Attorney  
415 East 12th Street  
11th Floor  
Kansas City, MO 64106  
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**WITNESSES:**

1. DET Kelly S. Bermond, 1125 Locust, Kansas City, MO 64106
2. Board of Police Commisioners, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. PO Andrew E. Keller, 1125 Locust, Kansas City, MO 64106
4. PO Steven B. Kendall, 1125 Locust, Kansas City, MO 64106
5. 
6. PO Kenneth E. Simbro, 1125 Locust, Kansas City, MO 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: August 28<sup>th</sup>, 2018

CRN: 18066290

I, Detective Bermond #3754  
(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 August 28<sup>th</sup>, 2018, at I-70 & Mulberry Street in  
(Date) (Address)

Kansas City, Jackson Missouri Keith A. Conner  
(County) (Name of Offender(s))

BM, 3-22-1988 committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 8-28-18, at 0845 hrs., Sgt. Majors R#110 responded to I-70 & Beardsley Rd., Kansas City, Jackson County, Missouri, after being dispatched to that location in regard to a suspicious person. Upon arrival Sgt. Majors was confronted by the offender, Keith Conner, on the I-70 bridge located directly over Mulberry Street, Kansas City, Jackson County, Missouri. Conner then requested that Sgt. Majors provide him with transportation to Kansas City, Kansas. Sgt. Majors advised Conner that another officer was enroute to provide transportation; at which time Conner entered police vehicle #119 on the driver's side, and drove eastbound from the scene on I-70.

Recorded video surveillance from inside the police vehicle recorded Conner driving #119 onto I-35, at which time he begins to travel northbound in the southbound lanes against traffic.

Multiple patrol vehicles began to canvas the area in search of the stolen police vehicle which had been broadcast over police radio. P.O. Kendall located police vehicle #119 traveling southbound on Broadway Blvd. from 10<sup>th</sup> street. P.O. Kendall activated his vehicle's emergency lights and audible siren, which Conner completely disregarded. While P.O. Kendall chased vehicle #119; officers Keller and Simbro assisted as a secondary pursuit vehicle at West Pennway & 21<sup>st</sup> street. Officers Keller and Simbro activated their emergency lights and siren at that time. Officers Keller and Simbro observed Conner disregard all stop signs and traffic control measures placing anyone on the roadway in danger. Conner eventually turned westbound at Avenida E. Chavez after ignoring the stop sign at Summit St., and continued driving into Kansas City, Kansas. Conner continued to flee from officers in Missouri and Kansas without any regard for pedestrians and motorists. Conner drove through a barricade at S. 18<sup>th</sup> Street Expressway and Kansas Avenue, in Kansas City, Kansas. Conner then drove approximately 1/2 mile before striking a guard rail and attempting to flee the scene on foot.

On 8-29-18, at 0908 hrs., Det. Bermond attempted to interview Conner while at the Wyandotte County Detention Facility located at 710 N. 7<sup>th</sup> St., in Kansas City, Kansas. Conner refused to exit his cell and speak with the reporting detective about the listed stolen auto offense.

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A preliminary cost estimate of damages including parts, body labor, paint labor, and paint supplies, totaled \$5,995.17. The average NADA Trade-In value of vehicle #119 is \$1575.

Printed Name Det. Bermond #3754 Signature *Det. Bermond #3754*

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

\_\_\_\_\_

Judge

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