

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

POLICE NO. :	18-069937
PROSECUTOR NO. :	095447933
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JAYE MATHIS)	
8319 Ward Parkway Place)	CASE NO. 1816-CR
Kansas City, MO 64114)	DIVISION
DOB: 08/25/1991)	
Race/Sex: W/M)	
████████████████████)	
)	
)	DEFENDANT.

COMPLAINT

Count I. Assault - 2nd Degree - Special Victim (565.052-004Y20171311.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **class B felony of assault in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 10, 2018, in the County of Jackson, State of Missouri, the defendant attempted to cause physical injury to ██████████ ██████████, a law enforcement officer, and special victim by means of a dangerous instrument by striking ██████████ with a car.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

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 September 10, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the second degree as charged in Count One, all allegations of which are incorporated herein by reference, and the

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defendant committed the foregoing felony of assault in the second degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) 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.

Count III. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20174801.0)

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 detention**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 10, 2018, in the County of Jackson, State of Missouri, Michael Jones, a law enforcement officer, was attempting to make a lawful detention of defendant, and the defendant knew or reasonably should have known that the officer was making a lawful detention, and, for the purpose of preventing the officer from effecting the detention, resisted the detention by fleeing from the officer, and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant operated a motor vehicle at speeds in excess of one hundred miles per hour in the area of Wornall Road and drove into oncoming traffic.

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/ Jeannette Wolpink
Jeannette Wolpink (#54970)
Assistant Prosecuting Attorney
415 East 12th Street, 7M
Kansas City, MO 64106
(816) 881-1776
jwolpink@jacksongov.org

WITNESSES:

1. PO Corby J. Adams, 1125 Locust, Kansas City, MO 64106
2. PO Johnathon D. Dawdy, 1125 Locust, Kansas City, MO 64106
3. PO Damon R. Hawley, 1125 Locust, Kansas City, MO 64106
4. SGT Michael A. Jones, 1125 Locust, Kansas City, MO 64106
5. PO Peter Neukirch, 1125 Locust, Kansas City, MO 64106
6. DET Daniel A. Porter, 1125 Locust, Kansas City, MO 64106
7. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09/11/2018

CRN: 18-69937

I, Detective Ilinca Rusnac #5741, of the Kansas City, Missouri Police Department (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 09/10/2018, at 11107 Grandview Rd in (Date) (Address)

Kansas City, Jackson Missouri Jaye R. Mathis (County) (Name of Offender(s))

R:W S:M DOB:08/25/1991 committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows:

On 09-10-2018 at 1120 hours, Officers of the Kansas City, Missouri Police Department responded to 11107 Grandview Rd, Kansas City, Jackson County MO (7/11 convenience store) to conduct a car check on a stolen gray Chrysler 200. -

Witness #2 and Witness #3 (on duty Kansas City Mo. police officers) were operating in an undercover capacity and were both inside the same 7/11 convenience store. They observed a gray Chrysler 200 parked at that location. The license plate responded back through the Rejis computer system as a stolen license plate. The gray 200 also matched the description of a stolen vehicle from Shawnee, Kansas.

Witness #1 and the Victim (on duty Kansas City Mo. police officers), who were operating together in the same marked patrol vehicle, responded to the area and pulled into the parking lot of the 7-11. They pulled in front of the gray 200 and exited in an attempt to conduct a car check. The Victim, who was in a police uniform, approached the driver's side door of the gray 200, gave the driver, Jaye Mathis, commands to stop and attempted to remove him from the vehicle. Mathis put the gray 200 into drive and pulled forward several feet while pushing the victim away. Mathis then put the gray 200 into reverse, and with the driver's door still open and the victim still holding onto Mathis, he reversed at a high rate of speed striking the victim with the door and throwing him into the fuel pumps. Mathis then put the vehicle back into drive and exited the parking lot at a high rate of speed southbound on Grandview Road and then east on Red Bridge Road toward US 71 Highway.

Witness #1 and the Victim initiated a pursuit of Mathis with their marked patrol unit having all emergency lights and siren equipment activated. During the pursuit, and while still in Jackson County MO, Mathis' vehicle drove at speeds in excess of 100 miles per hour on city streets, driving the wrong way into oncoming traffic and through construction zones with workers present. It did not yield to oncoming traffic at intersections and failed to stop at red traffic signals on numerous occasions. The vehicle pursuit ended at 75th St and Roe Av, Prairie Village, Kansas after the vehicle became disabled.

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Mathis exited the vehicle and ran but was taken into custody by Witness #1 and the Victim after a foot pursuit.

Printed Name Detective Ilinca Rusnac #5741 Signature Det. Rusnac #5741

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

Judge

Circuit Court of _____ County, State of Missouri.