

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	19-013886
PROSECUTOR NO. :	095451117
OCN:	HS007821

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
GARY P JONES JR.)	
6104 Walrond Ave)	CASE NO. 1916-CR
Kansas City, MO 64130)	DIVISION
DOB: 12/12/1996)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT

Count I. 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 stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 23, 2019, in the County of Jackson, State of Missouri, Aaron Jones and Steven Weber, law enforcement officers, were attempting to make a lawful stop of a vehicle being operated by 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, between 75 and 90 mph, along East 55th Street, in speed zones of 35 to 45 mph, while driving into on-coming traffic and eventually striking another vehicle.

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.

State vs. Gary P Jones Jr.

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/ Mary Beth Youngworth
Mary Beth Youngworth (#69106)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 884-3834
mdyoungworth@jacksongov.org

WITNESSES:

1. PO Mackenzie L. Easley, 1125 Locust, Kansas City, MO 64106
2. PO Aaron E. Jones, 1125 Locust, Kansas City, MO 64106
3. PO Gregory Kinney,
4. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
5. PO Nicholas S. Simons,
6. PO Steven R. Weber, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02/23/2019

CRN: 19-13886

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 02/23/2019, at E 55 St and Blue Ridge Cutoff in
(Date) (Address)

Kansas City, Jackson Missouri Gary P. Jones JR
(County) (Name of Offender(s))

R:B S:M DOB:12/12/1996 committed one or more criminal offense(s).
(Description of Identity)

**Felony Eluding
Resisting Arrest**

The facts supporting this belief are as follows:

On 02/23/2019 at 1522 hours, Officers of the Kansas City, Missouri Police Department were conducting uniformed surveillance of a funeral taking place at Graceway Church located at 5460 Blue Ridge Cutoff.

While conducting surveillance just to the west of the location, Officers heard the sound of approximately ten gunshots and observed a gray Nissan Altima driving at a high rate of speed westbound on E 55 ST. When the sound of shots occurred, the Officers' marked patrol vehicle was parked in a parking lot approximately 20 to 30 feet south of E 55 ST with a clear line of sight to the roadway. Officers began driving westbound on E 55 ST and activated their emergency lights and sirens, following the listed vehicle. The vehicle failed to stop for the marked police vehicle with its activated emergency lights and siren and continued driving westbound on E 55 St. The listed vehicle consistently crossed the double yellow lines and drove into oncoming lanes of traffic, swerving past oncoming vehicles, failing to stop at red traffic control signals and driving at a high rate of speed exceeding 75-90 miles per hour where the posted speed limits ranged between 35-45 miles per hour. The listed vehicle came to a complete stop only after being involved in a hit and run collision with another vehicle. Officers then observed the driver of the vehicle, later identified as **Gary P. JONES JR.**, to exit the vehicle immediately following the collision and run southbound and then westbound through an open field just to the south of Blue PKWY/Cleveland AV, where he was taken into custody by pursuing officers.

Gary P. JONES JR. was transported to headquarters where he was read his Miranda rights. **Gary P. JONES JR.** stated that he understood his rights and provided his statement without requesting the presence of an attorney. **Gary P. JONES JR.** stated that he had just left his friend's funeral and was giving two other people rides. **Gary P. JONES JR.** was driving his gray 2008 Nissan Altima headed westbound on E 55 St just west of Blue Ridge Cutoff. He had stopped his car in front of the church's parking lot exit on E 55 St and began looking

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down towards his lap and floorboard looking for his cell phone, when he heard what sounded like gun shots coming from outside of his vehicle, immediately followed by several gun shots fired from inside of his vehicle by one of his other two occupants but unknown which one exactly. **Gary P. JONES JR.** then began driving away from the location when he heard the police siren and observed the marked police vehicle with its emergency lights and siren activated, following behind him. **Gary P. JONES JR.** stated that he did not want any involvement so he continued to drive away hoping that his other two occupants would jump out of his vehicle. He then crashed his vehicle while eluding the police and began running away from the scene on foot until he was apprehended by pursuing officers.

Printed Name Detective Ilinca Rusnac #5741

Signature

Ilinca 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.

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

POLICE NO. :	19-013886
PROSECUTOR NO. :	095451116
OCN:	HS007825

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
GERRAD D RIVERA-WILLIS)	
8916 Woodland)	CASE NO. 1916-CR
Kansas City, MO 64132)	DIVISION
DOB: 12/16/1999)	
Race/Sex: B/M)	
[REDACTED])	
)	DEFENDANT.

COMPLAINT

Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class B Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about February 23, 2019, at E. 55th Street and Blue Ridge Cutoff, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm from a Nissan Altima, a motor vehicle.

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. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

State vs. Gerrad D Rivera-Willis

Count II. 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 stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 23, 2019, in the County of Jackson, State of Missouri, Aaron Jones and Steven Weber, law enforcement officers, were attempting to make a lawful stop of a vehicle, and the defendant, either acting alone or in concert with another, 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, between 75 and 90 mph, along East 55th Street, in speed zones of 35 to 45 mph, while driving into on-coming traffic and eventually striking another vehicle.

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.

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/ Mary Beth Youngworth

Mary Beth Youngworth (#69106)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 884-3834
mdyoungworth@jacksongov.org

WITNESSES:

State vs. Gerrad D Rivera-Willis

1. PO Mackenzie L. Easley, 1125 Locust, Kansas City, MO 64106
2. PO Aaron E. Jones, 1125 Locust, Kansas City, MO 64106
3. PO Gregory Kinney,
4. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
5. PO Nicholas S. Simons,
6. PO Steven R. Weber, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02/23/2019

CRN: 19-13886

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 02/23/2019, at E 55 St and Blue Ridge Cutoff in
(Date) (Address)

Kansas City, Jackson Missouri Gerrad D. Rivera-Willis
(County) (Name of Offender(s))

R:B S:M DOB:12/16/1999 committed one or more criminal offense(s).
(Description of Identity)

**Unlawful Use of a Firearm
Shooting from a Motor Vehicle
Resisting Arrest**

The facts supporting this belief are as follows:

On 02/23/2019 at 1522 hours, Officers of the Kansas City, Missouri Police Department were conducting uniformed surveillance of a funeral taking place at Graceway Church located at 5460 Blue Ridge Cutoff.

While conducting surveillance just to the west of the location, Officers heard the sound of approximately ten gunshots and observed a gray Nissan Altima driving at a high rate of speed westbound on E 55 ST. When the sound of shots occurred, the Officers' marked patrol vehicle was parked in a parking lot approximately 20 to 30 feet south of E 55 ST with a clear line of sight to the roadway. Officers began driving westbound on E 55 ST and activated their emergency lights and sirens, following the listed vehicle. The vehicle eluded the marked police vehicle until it came to a complete stop due to being involved in a vehicular hit and run collision. Officers observed the front passenger, later identified as **Gerrad D. Rivera-Willis**, to exit the vehicle immediately following the collision and begin to run away from the scene in a northbound direction.

Rivera-Willis was located by other responding officers minutes later and taken into custody. Police canine officer also responded and assisted in an area article search by walking the same path that **Rivera-Willis** was observed walking prior to being detained. The canine officer located two firearms.

Rivera-Willis was transported to headquarters where he was read his Miranda rights. **Rivera-Willis** stated that he understood his rights and provided his statement without requesting the presence of an attorney. **Rivera-Willis** advised that he had just left his cousin's funeral and was sitting in the front passenger seat of his friend's car when he observed a suspicious vehicle in the church's parking lot. The vehicle that **Rivera-Willis** was in then circled the church and proceeded to drive westbound on E 55 St from Blue Ridge Cutoff when

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Rivera-Willis noticed the same vehicle facing E 55 St as if pulling out of the church parking lot, as they were driving by. **Rivera-Willis** believed the occupants of the vehicle were going to shoot at him and then heard the sound of gunfire. He never actually saw any person holding a firearm or actually shooting from said vehicle in the direction of the vehicle he was in. **Rivera-Willis** then shot his pistol two or three times in the direction of the vehicle until he heard the police sirens behind their vehicle. He then ran from the vehicle he was in after it was involved in the hit and run collision and away from police officers out of fear, while ridding himself of his firearm along his path of travel. He stopped running but continued walking away when he observed police officers taking the other occupants of the vehicle into custody. He was then located by other responding officers and taken into custody.

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.

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

POLICE NO. :	19-013886
PROSECUTOR NO. :	095451118
OCN:	HS007822

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
ZION M. OWSLEY)	
1847 E. 78th Street)	CASE NO. 1916-CR
Kansas City, MO 64132)	DIVISION
DOB: 10/24/1998)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

COMPLAINT

Count I. Receiving Stolen Property (570.030-048Y20172899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030.1(3), RSMo, committed the **class D felony of receiving stolen property**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 23, 2019, in the County of Jackson, State of Missouri, the defendant, with the purpose to deprive the owner of a .40 caliber handgun, retained such property, knowing or believing that it had been stolen, and the property appropriated was a .40 caliber Smith and Wesson, firearm.

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.

Count II. 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,

State vs. Zion M. Owsley

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 February 23, 2019, in the County of Jackson, State of Missouri, Aaron Jones and Steven Weber, law enforcement officers, were attempting to make a lawful stop of a vehicle, and the defendant, either acting alone or in concert with another, 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, between 75 and 90 mph, along East 55th Street, in speed zones of 35 to 45 mph, while driving into on-coming traffic and eventually striking another vehicle.

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.

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/ Mary Beth Youngworth
Mary Beth Youngworth (#69106)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 884-3834
mdyoungworth@jacksongov.org

WITNESSES:

1. PO Mackenzie L. Easley, 1125 Locust, Kansas City, MO 64106
2. PO Aaron E. Jones, 1125 Locust, Kansas City, MO 64106
3. PO Gregory Kinney, 1125 Locust, Kansas City, MO 64106
4. DET Ilinca E. Rusnac, 1125 Locust, Kansas City, MO 64106
5. PO Nicholas S. Simons, 1125 Locust, Kansas City, MO 64106

State vs. Zion M. Owsley

6. PO Steven R. Weber, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02/23/2019

CRN: 19-13886

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 02/23/2019, at E 55 St and Blue Ridge Cutoff in
(Date) (Address)

Kansas City, Jackson Missouri Zion A. Owsley
(County) (Name of Offender(s))

R:B S:M DOB:10/24/1998 committed one or more criminal offense(s).
(Description of Identity)

**Possession of a Stolen Firearm
Resisting Arrest**

The facts supporting this belief are as follows:

On 02/23/2019 at 1522 hours, Officers of the Kansas City, Missouri Police Department were conducting uniformed surveillance of a funeral taking place at Graceway Church located at 5460 Blue Ridge Cutoff.

While conducting surveillance just to the west of the location, Officers heard the sound of approximately ten gunshots and observed a gray Nissan Altima driving at a high rate of speed westbound on E 55 ST. When the sound of shots occurred, the Officers' marked patrol vehicle was parked in a parking lot approximately 20 to 30 feet south of E 55 ST with a clear line of sight to the roadway. Officers began driving westbound on E 55 ST and activated their emergency lights and sirens, following the listed vehicle. The vehicle eluded the marked police vehicle until it came to a complete stop due to being involved in a vehicular hit and run collision. Officers observed the rear passenger, later identified as **Zion A. OWSLEY**, to exit the vehicle immediately following the collision and begin to run away from the scene in a northbound direction.

Other responding officers located **Zion A. OWSLEY** as he was kneeling on the ground attempting to conceal an unknown object in the brush. He was taken into custody moments later and transported to headquarters for questioning. Police canine officer also responded and assisted in an area article search by walking the same path that **Zion A. OWSLEY** was observed to have taken until being detained. The canine officer located two firearms.

Zion A. OWSLEY was read his Miranda Rights. He stated that he understood his rights and provided his statement without requesting the presence of an attorney. **Zion A. OWSLEY** advised that he had just left a funeral and got a ride to his cousin's house. He stated that he never heard the sound of shots and never observed anyone shooting either at the vehicle he was in nor out of the vehicle he was in. He knew that the vehicle he was

PROBABLE CAUSE STATEMENT FORM

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in was being pursued by a marked police vehicle with its emergency lights and siren activated and admitted to having run from the vehicle after it was involved in a collision. He also admitted to being in possession of a black and silver Smith and Wesson .40 caliber handgun with an extended magazine but denied ever shooting. He advised that he attempted to conceal the firearm in a brush after running away from the scene but was caught by uniformed officers in the process and detained. A computer search of the serial number of the listed handgun revealed it to be reported stolen out of Overland Park, KS.

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.