IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

POLICE NO.	: 19-044794
PROSECUTOR NO.	: 095453396
OCN	: HR005462
STATE OF MISSOURI,)
,	INTIFF,)
VS.)
CHRISTORIUS D. WILCON)
CHRISTOPHER D. WILSON)
2501 S. Powahatan Ave.) CASE NO. 1916-CR
Independence, MO 64057) DIVISION
DOB: 10/03/1977)
Race/Sex: B/M)
)
DEFE	NDANT.)

COMPLAINT

Count I. Assault - 2nd Degree (565.052-001Y20171305.0)

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 D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 16, 2019, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to Lashanda R. Temple by striking her with his vehicle.

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. Leaving Scene Of Accident - Physical Injury (577.060-001Y20175401.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 577.060, RSMo, committed the class E felony of leaving the scene of an accident, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 16, 2019,

State vs. Christopher D. Wilson

the defendant, while operating a motor vehicle on E. 31st St. & Benton Blvd., in the County of Jackson, State of Missouri, was involved in an accident that resulted in physical injury to Lashanda R. Temple, and the defendant knew that such accident had occurred, and defendant left the location of the accident without stopping and giving defendant's name, residential address, license number of defendant's vehicle, and operator's license number to the other party in the accident, a law enforcement officer in the vicinity, or to the nearest law enforcement agency.

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.

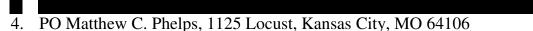
Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER

Prosecuting Attorney Jackson County, Missouri by,

/s/ Daniel Portnoy
Daniel Portnoy (#62186)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Floor
Kansas City, MO 64106
(816) 881-3286
dportnoy@jacksongov.org

WITNESSES:



- 5. PO Lawrence R. Pollard, 1125 Locust, Kansas City, MO 64106
- 6. DET Kevin D. Richardson, 1125 Locust, Kansas City, MO 64106
- 7. DET Chad M. Rives, 1125 Locust, Kansas City, MO 64106

State vs. Christopher D. Wilson

- 8. MO 64106
- 9. Lashanda R. Temple, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 10. PO David Travaglione, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date	: 06-24-2019				CRN: _1	9-044794	
I, Do	et. K. Richardson	#4290		1			
	me and identify law enforce				t the facts con	stained herein are t	rua
	ve probable cause t						in
	_		(Date)		(Address))	
Kans	as City, <u>Jacks</u>		Christopher D.	Wilson f Offender(s)	B/M 10-03	3-1977 (Description of Identity)	
	nitted one or more	criminal offense(s).	Offender(5)		(Description of Identity)	
The f On Bo	acts supporting this 06-16-2019 at 06 ulevard, Kansas Cicident Investigation	s belief are as fol 407 hours, Kans ty, Jackson Cour	lows: as City Missouri aty, Missouri in re	gard to a seriou	s injury hit &	run crash. Memb	ers of the
a h stri pai we	restigation revealed igh rate of speed of uck the victim, LR read on the south si re with the victim time the suspect v	n E. 31 st Street ju S. It was determ de of E. 31 Stree at the time of the	st east of Benton I nined that the vict it just east of Benton hit & run crash.	Boulevard when im was attempt on Boulevard. The witnesses	n the driver lost ing to enter the Investigation in	st control of the vene driver's seat of revealed four with	hicle and a vehicle esses that
	ring an area canva nton Boulevard, wl			eillance camera	at the interso	ection of E. 31 st S	treet and
sce A 1 vel vel pla	formation was receive, had participate review of social monicle that matched nicle you could see the #KR8N5F reveals to the terminant of the terminal of the t	d in the car show edia post under the the description of the displayed M led no wants or v	at Juneteenth in the Instagram according the suspect vehicles our license plant warrants and Misson at Juneteenth in the Instagram of the Section 2015 of the Instagram of the I	the area of E. 1 unt "wheelsnde icle that fled the te #KR8N5F. Abouri DOR response	8 th Street and alcertified" re the crash scene A computer ch anded registere	Vine Street on 06- evealed several pice. In one of the po- neck of the Missou ed to Chris Wilson	15-2019. tures of a ost of the ri license
the	computer check of intersection of E. v blocks from the c	35th Street and F	rospect Avenue o	n 06-16-2019 a	at 0334 hours.	. That intersection	
sta veh Av exi pas sus sus sol	tnesses later responted as she left the nicle, parked across tenue. As ted the field at a ssenger seat behind spect lost control of spect vehicle as a be occupant of the bestated the drill, with a bald head,	club in the area is the street in the and her friends we high rate of spec- the driver's seat of the suspect veh- brown "old school brown Chevrolet, wer of the Chevro	a of E. 31 st Street field just east of alked across the st ed. was t. stated the clicle and struck the ol? Chevrolet with exited the vehicle olet, which she de	and Benton E club on the nor reet to get inside able to enter he he victim was a e victim and the gold trim and after the crash scribed as a tal	Boulevard, and theast corner le their parked vehabout to open he parked vehabout rims. and stated he li black male,	d she observed the of E. 31 st Street and vehicle the suspect hicle, and get into the driver's door icle. Stated the dwas so sorry sever approximately 30-	nd Agnes et vehicle the rear when the ribed the river and ral times. -40 years

stated she could identify the suspect driver. I then presented a photo line-up containing six similar black males,

PROBABLE CAUSE STATEMENT FORM

CRN 19-044794

with CHRISTOPHER D. WILSON B/M 10-03-1977 in the #2 position. immediately pointed at WILSON and stated he was driver of the Chevrolet that struck the victim and fled the crash scene.
Detective L. Pollard interviewed witness while at South Patrol Division. also reviewed a photo line-up containing six similar black males with CHRISTOPHER D. WILSON B/M 10-03-1977 in the #2 position. Diamond positively identified WILSON as the suspect that was driving the Chevrolet at the time of the hit & run crash.
The victim was transported to an area hospital with life threatening injuries. The victim sustained two broken legs which resulted in her right leg being amputated just below her knee.
On 06-24-2019, WILSON was taken into custody. After advising WILSON of his rights, per Miranda, he refused to give a statement.
A computer check of WILSON revealed him to valid through Missouri DOR. Printed Name Det. K. Richardson #4290 Signature
Printed Name Det. K. Richardson #4290 Signature
The Court finds probable cause and directs the issuance of a warrant this day of
Judge
Circuit Court of County, State of Missouri,