

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

POLICE NO. :	18-081469
PROSECUTOR NO. :	095453901
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
TERRELL WATKINS	)	
5301 E. 27th St.	)	CASE NO. 1916-CR
Kansas City, MO 64127	)	DIVISION
DOB: 02/25/1985	)	
Race/Sex: B/M	)	
	)	
DEFENDANT.	)	

COMPLAINT
SUMMONS REQUESTED

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840999.0)

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 October 21, 2018, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Chandan Rajanna by colliding with a vehicle in which Chandan Rajanna was an occupant while defendant was operating a vehicle at an excessive rate of speed and failing to keep careful lookout.

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.

State vs. Terrell Watkins

Count II. Assault - 2nd Degree (565.052-001Y20171399.0)

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 October 21, 2018, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to Krishna Rajanna by colliding with a vehicle in which Krishna Rajanna was an occupant while defendant was operating a vehicle at an excessive rate of speed and failing to keep careful lookout.

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 III. Assault - 2nd Degree (565.052-001Y20171399.0)

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 October 21, 2018, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to Lisa Allen by colliding with a vehicle in which Lisa Allen was an occupant while defendant was operating a vehicle at an excessive rate of speed and failing to keep careful lookout.

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.

State vs. Terrell Watkins

**Count IV. Operated A Motor Vehicle In A Careless And Imprudent Manner-
Involving An Accident (304.012-002N19965499.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 304.012, RSMo, committed the **Class A Misdemeanor of Careless and Imprudent Driving**, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about October 21, 2018, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle on a public highway known as I-435, in a careless and imprudent manner by driving at an excessive rate of speed and failing to keep careful lookout, and thereby endangered the property of another or the life and limb of any person and was at that time involved in an accident.

The range of punishment for a Class A Misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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/ Dion Sankar
Dion Sankar (#64333)
Assistant Prosecuting Attorney
415 E. 12th St., 10th Fl
Kansas City, MO 64106
(816) 881-3113
dsankar@jacksongov.org

WITNESSES:

1. Lisa Allen, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. DET Gary L. Burgess, 1125 Locust, Kansas City, MO 64106
3. Keith Burgess, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

State vs. Terrell Watkins

4. SGT Jeffrey A. Cowdrey, 1125 Locust, Kansas City, MO 64106
5. Celeste Gagne, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
6. James A. Hubbard, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. PO Karl T. Janning, 1125 Locust, Kansas City, MO 64106
8. PO Jamie D. Lamb, 1125 Locust, Kansas City, MO 64106
9. Gail Meis, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
10. Joe Meis, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
11. Krishna Rajanna, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
12. SGT Deborah J. Randol, 1125 Locust, Kansas City, MO 64106
13. DET Kevin D. Richardson, 1125 Locust, Kansas City, MO 64106
14. Michael Ronan, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

DATE: 07/26/2019

CRN: 18-081469

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 10/21/2018, at Stadium Drive and I-435 in
(Date) (Address)

Kansas City, Jackson Missouri, Terrell E Watkins B/M, 02/25/1985
(County) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

Fatality

The facts supporting this belief are as follows:

On October 21, 2018 at 1605 hours, Kansas City, Missouri Police Officers responded to Stadium Drive and Interstate 435 (I-435), Kansas City, Jackson County, Missouri in regard to an injury vehicular. Upon arrival officers determined a blue Ford E350 Van was traveling north on I-435 in the #4 lane and, as it approached Stadium Drive, it rear ended a red 2017 Mitsubishi Lancer, which was stopped in traffic. The impact caused the Mitsubishi to strike a white 2017 Ford Edge, which then pushed the Ford Edge into the rear of a black 2017 Chevrolet Suburban. The Ford Edge and Chevrolet were also stopped or slowly rolling prior to being struck. The driver of the red Mitsubishi Lancer, Chandan Rajanna (w/m, 03/02/2001) was pronounced dead at the scene and the two passengers inside that vehicle, Lisa Allen (w/f, 10/01/1969) and Krishana Rajanna (w/m, 10/16/1937) were transported to an area hospital with life-threatening injuries. The driver of the blue Ford E350 Van, **Terrell E Watkins (b/m, 02/25/1985)**, was transported to an area hospital with non-life threatening injuries.

Kansas City, Missouri Police Detectives interviewed witnesses at the scene. One of the witnesses, who was driving in the #3 lane, stated that he observed a blue Ford E350 Van traveling northbound on I-435 in the #4 lane and it was approaching congested traffic ahead at the Stadium Drive exit. According to this witness, the blue Ford E350 Van was traveling 50-60 MPH and, as it got within 20-30 feet of the traffic congestion, the driver of the blue Ford E350 Van locked up the brakes on that vehicle and steered to the left, but was unable to avoid crashing into the rear of a red Mitsubishi Lancer. The collision caused a "chain reaction" crash involving two additional vehicles, a white Ford Edge and a black Chevrolet Suburban. The red Mitsubishi Lancer, the white Ford Edge, and the black Chevrolet Suburban appeared to be either stopped or slowly rolling prior to being struck. After the crash, this witness observed Watkins to be unresponsive while sitting in the driver's seat of the blue Ford E350 Van for approximately 20-30 seconds.

Detectives contacted other witnesses who were on I-435 in and around the time of the crash. These other witnesses observed the blue Ford E350 Van prior to the crash. These witnesses told Detectives that they were traveling north on I-435 when they observed the blue Ford E350 Van traveling north on I-435, just north of Bannister Road. At that time, these witnesses stated that the blue Ford E350 Van was traveling approximately 75-80 MPH and made numerous lane changes as it passed other motorists on the highway. After that, these witnesses lost sight of the blue Ford E350 Van until they approached the Stadium Drive exit. Upon doing so, these witnesses observed the same blue Ford E350 Van to be involved in a crash. On October 21, 2018, Watkins was employed as a Kansas City, Missouri Police Officer assigned to the Police Athletic League Unit. As part of that unit, he was assigned the blue Ford E350 Van, with the Police Athletic league emblem, and bearing license plate 80. Records revealed that Watkins was employed off-duty as game day security for the Kansas City Chiefs. On the day of the crash, Watkins was scheduled to work the Sunday night National Football League game between the Kansas City Chiefs and the Cincinnati Bengals. With the game scheduled to begin at 1920 hours, Watkins's off duty schedule required him to be inside Arrowhead Stadium at 1600 hours for duty assignments. At 16:04: 17 hours,

PROBABLE CAUSE STATEMENT FORM

CRN 18-081469

minutes after he was supposed to be inside the stadium, Watkins notified the KCPD police dispatcher by radio of the crash and identified that it took place on the highway just south of the exit for Stadium Drive.

The portion of roadway at or near the crash site on the northbound portion of I-435 is just south of the Stadium Drive Exit. In this area, the #1, #2, and #3 lanes are moving lanes of traffic and the #4 lane is a lane of traffic designated as an exit lane for Stadium Drive. When traveling northbound, there is a slight hill which crests just before this stretch of road way. The speed limit for moving traffic on I-435 is 65MPH.

An Accident Investigations Officer obtained data from the Airbag Control Module, which was located inside the blue Ford E350 Van. The data revealed the blue Ford E350 Van was traveling 76 MPH at 0.8 seconds prior to the impact with the rear of the red Mitsubishi Lancer and, at that time, the brake was not applied and the ABS was not "Active." Additionally, the blue Ford E350 Van was traveling 65 MPH at impact with the rear of the red Mitsubishi Lancer with the brake applied and ABS identified as "Active."

Using a similar Ford E-350 Van, Accident Investigations Officers determined that an individual driving northbound in and around the hill just south of Stadium Drive would be able to see a stationary vehicle in a lane of traffic for north bound I-435, just south of the Stadium Drive for just over 27 seconds if traveling at 76 MPH.

In this officer's training and experience, distraction, especially cellphone usage, is a major contributing factor to motor vehicle crashes. Detectives obtained search warrants for phone records associated with Watkins's cell phone from the day of the accident and Watkins's Galaxy Note 9 mobile phone. These searches revealed that Watkins's phone was actively in use in the moments immediately preceding his reporting of the crash. The phone records from October 21, 2018 show that Watkins received a phone call starting at 15:52:59. That call ended at 16:02:55. Watkins's mobile phone was obtained and released to the heart of America Regional Computer Forensics Laboratory so that a forensic examination could be conducted. The forensic examination revealed that on October 21, 2018, there were two Multimedia Messaging Service (MMS) messages recorded on the phone just before the crash. At 16:02:23, Watkins's phone received an MMS message. At 16:03:21, a responsive MMS message was sent from Watkins's phone to the received MMS message. That outgoing message was sent approximately 26 seconds after the conclusion of the above telephone call ended at 16:02:55.

Within 1 minute of the last recorded activity on Watkins's phone, the sent MMS message at 16:03:21, Watkins notified the KCPD police dispatcher by radio of the crash at 16:04:17.

On October 21, 2018, a Kansas City, Missouri Police Detective responded to the hospital and contacted Watkins to obtain a statement pertaining to the crash. Because Watkins invoked his 5th and 6th Amendment rights, no statement was taken. A computer check revealed that Watkins has a valid Missouri 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.