

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC19077880
PROSECUTOR NO. :	095455458
OCN:	HS014021

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
DEAUNDRE R. WILSON)	
2513 A NW Chipman Rd.)	CASE NO. 1916-CR
Lees Summit, MO 64081)	DIVISION
DOB: 09/22/1985)	
Race/Sex: B/M)	
████████████████████)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Assault - 2nd Degree - Special Victim (565.052-004Y20171310.0)

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 October 10, 2019, in the County of Jackson, State of Missouri, the defendant attempted to cause physical injury to Tanner N. Moats, a law enforcement officer and special victim by means of a deadly weapon by pulling a firearm out of his pants while facing ██████████ and then engaging in a physical altercation with him.

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 (571.015-001Y19755212.0)

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 October 10, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the second degree charged in

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Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about October 10, 2019, in the County of Jackson, State of Missouri, the defendant knowingly possessed a firearm, and on November 1, 2003, the defendant was convicted of the felony of trafficking drugs in the second degree and distribution of a controlled substance in the Circuit Court of Jackson County, Missouri; on August 20, 2004, the defendant was convicted of felony possession of a controlled substance in the Circuit Court of Jackson County, Missouri; on July 13, 2011, the defendant was convicted of the felony of tampering with a motor vehicle in the first degree in the Circuit Court of Jackson County, Missouri.

Count IV. Resisting Or Interfering With Arrest/detention/stop (575.150-003Y19104801.0)

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 A misdemeanor of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about October 10, 2019, in the County of Jackson, State of Missouri, law enforcement officers, were attempting to make a lawful stop of defendant, and the defendant knew that the officer(s) were making a lawful

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stop, and, for the purpose of preventing the officer(s) from effecting the stop, resisted the stop of defendant by fleeing from the officers and/or using or threatening the use of violence, physical force or physical interference.

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/ Jennifer S Tatum
Jennifer S Tatum (#70789)
Assistant Prosecuting Attorney
415 E. 12th Street
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Kansas City, MO 64106
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jtatum@jacksongov.org

WITNESSES:

1. [REDACTED]
64106
2. DET Blake E. Groves, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]
[REDACTED] Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 10/11/2019

CRN: 19-077880

I, Detective Blake Groves #5271 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 10/10/2019, at 3207 Highland Av in
(Date) (Address)

Kansas City, Jackson Missouri Deandre R. Wilson
(County) (Name of Offender(s))

B/M 09/22/1985 committed one or more criminal offense(s).
(Description of Identity)

- RSMO 565.050: Assault 1st Degree (of a special victim)
- RSMO 571.070: Unlawful Possession of a Firearm
- RSMO 575.150: Resisting Arrest (of a felony)

The facts supporting this belief are as follows:

On 10/10/2019 at approximately 1628 hours, officers with the Kansas City, Missouri Police Department's Central Patrol Division were patrolling in the area of 33rd and Woodland when they observed a vehicle with warrants that responded back on the plate.

They conducted a vehicle stop at 33rd and Michigan and contacted the occupants. One of the officers (VOD) contacted the driver who stated his identification was in the trunk. The other officer contacted the front passenger who gave his Missouri Non-Driver's license which showed he was Deandre R. Wilson B/M 09-22-1985.

VOD removed the driver from the vehicle so he could get his identification from the trunk. When he escorted the driver back, Wilson climbed over to the driver's seat, jumped out of the car, and ran. VOD pursued him on foot as he ran northbound on Michigan, westbound through a church parking lot, crossed over Woodland Avenue, ran through yards, and into the yard adjacent to 3207 Highland Avenue.

As VOD caught up with him, Wilson turned toward him while pulling a black and gray semiautomatic handgun from his waistband. VOD grabbed Wilson's wrist and arm as he ran into him, and they both went to the ground. The two struggled over the gun until VOD managed to get it from Wilson and toss out of his reach.

Wilson continued to resist his arrest and VOD was afraid he was trying to get to the gun. As Wilson pulled away, VOD grabbed his shirt. As the shirt began to tear, Wilson removed it and fled on foot across Highland Avenue where he ran between houses and jumped a fence. VOD's radio microphone had been torn from his uniform during the struggle, but once he was able to find it, VOD put out the suspect's information and last location.

Responding officers located Wilson in the back yard of 3229 Wayne Avenue with no shirt on and covered in dirt and mud. An on-scene identification was conducted, and VOD identified Wilson as the suspect who pulled a gun on him.

A gray and black Springfield Armory XD .45 caliber semi-automatic handgun with a serial number of MG594778 was located in the yard adjacent to 3207. It was loaded with 9 rounds, making it readily capable of lethal use.

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A nearby resident responded to Headquarters for an interview and told the detective that she had just pulled into her driveway when she saw two men fighting on the ground in a yard. She then realized that one was a police officer. She saw the suspect striking and hitting the officer, and heard the officer ordering him to stop.

Wilson was transported to Headquarters for questioning, and after waiving his Miranda rights, he admitted to running from police because he had warrants. He stated he never had a gun and never assaulted an officer.

A computer inquiry of Wilson's criminal history revealed the following felony convictions:

On 11/01/2003, Wilson was convicted of the felony of Trafficking Drugs in the 2nd Degree and Distribution of a Controlled Substance in the Circuit Court of Jackson County, Missouri.

On 08/20/2004, Wilson was convicted of the felony of Possession of a Controlled Substance in the Circuit Court of Jackson County, Missouri. His 7-year sentence was suspended and he received 2 years probation. He then violated that probation and was given a 7-year sentence.

On 07/13/2011, Wilson was convicted of 2 counts of the felony of Tampering with a Motor Vehicle in the 1st Degree in the Circuit Court of Jackson County, Missouri.

Wilson should be considered a danger to the public due to his flagrant disregard for the law. He currently has a warrant for his arrest and has multiple convictions for possession and trafficking of controlled substances. His criminal history shows that when he has been given probation for prior offenses, he has violated it. He is forbidden by law to possess a firearm; however that did not prevent him from obtaining one and using it against a law enforcement officer.

Printed Name Detective Blake Groves #5271 Signature  5271

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

Judge

Circuit Court of _____ County, State of Missouri.