


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

POLICE NO. :	KC19087007
PROSECUTOR NO. :	095456080
OCN:	HR007693

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
SKYLAR K. WADDELL)	
3800 E. 93rd St.)	CASE NO. 1916-CR
Kansas City, MO 64132)	DIVISION
DOB: 02/19/1999)	
Race/Sex: W/M)	
)	
	DEFENDANT.)

**COMPLAINT
WARRANT REQUESTED**

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840909.0)

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 November 13, 2019, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Steven W. Norris by swerving the vehicle defendant was operating back in forth while Steven W. Norris was holding onto the side of that vehicle.

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.

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Count II. Leaving Scene Of Accident - Accident Resulting In Death (577.060-006Y20175401.0)

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 D felony of leaving the scene of an accident**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 13, 2019, the defendant, while operating a motor vehicle on I-435 Hwy. & Oldham Rd., in the County of Jackson, State of Missouri, was involved in an accident that resulted in the death of Steven W. Norris, 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 a law enforcement officer in the vicinity or to the nearest law enforcement agency.

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.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Brady X. Twenter
Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
415 E. 12th St.
10th Floor
Kansas City, MO 64106
BTwenter@jacksongov.org

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WITNESSES:

1. Terry Albert Jacobs, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. Steven W. Norris, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Kevin D. Richardson, 1125 Locust, Kansas City, MO 64106
4. Rebecca Wall, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 11-14-2019

CRN: 19-087007

I, Det. K. Richardson #4290

(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 11-13-2019, at I-435 Highway and Oldham Road in Kansas City, Jackson Missouri, Skyler K. Waddell W/M 02-19-1999

committed one or more criminal offense(s).

Leaving the scene of Fatality Crash/ DWS

The facts supporting this belief are as follows:

On 11-13-2019 at 1304 hours, Kansas City Missouri Police Department responded to the area of I-435 Highway, northbound, at Oldham Road, Kansas City, Jackson County, Missouri in regard to fatality crash. Members of the Accident Investigation Section along with members of the Traffic Investigation Section responded to the scene.

Detective K. White contacted a witness at the crash scene, T. Jacobs. Mr. Jacobs stated he was traveling northbound on I-435 Highway approaching Oldham Road when he observed a white smaller sedan pull behind a white F-150 truck, which was stopped on the right shoulder. Mr. Jacobs observed a white male, later identified as the victim (Steven Norris), get out of the sedan and run up to the F-150 where another white male, later identified as the suspect, later identified as SKYLER K. WADDELL W/M 02-19-1999, was inside the cab of the white F-150. Mr. Jacobs stated he observed the victim and suspect appear to be yelling or fighting while at the truck. Mr. Jacobs slowed his vehicle as he approached and observed the suspect get out of the white Ford F-150 and run to a dark colored Dodge Ram that was parked in front of the F-150. As Jacobs passed the vehicles, he observed the suspect enter the cab of the Dodge Ram pick-up and the victim jump onto the back of the pick up while holding onto the driver side of the pick-up bed. Jacobs passed the Dodge Ram, looked into his side mirror and observed the suspect accelerate and pull into traffic in an aggressive manner. Mr. Jacobs stated the suspect made 4 distinct and erratic turns or swerves in the road while changing lanes multiple times in what appeared to be a deliberate attempt to throw the victim off of the truck. Mr. Jacobs could still see the victim holding onto the side of truck during these actions by the suspect. Mr. Jacobs observed the suspect lose control of the Dodge Ram and veer over to the inside median where it nearly flipped and strike the inside guard rail, and crash. Mr. Jacobs observed the victim fly off the pick-up truck in the air and land in the southbound lanes of I-435 Highway where he didn't move. Mr. Jacobs stopped his vehicle and the side of the highway and observed the suspect limping in the southbound lanes of traffic in an attempt to stop several drivers. Mr. Jacobs stated the suspect fled eastbound on foot. Mr. Jacobs described the white male suspect as 5'08", 150-160 lbs, approximately 25 years old, blonde hair, brown/blonde hair, no facial hair, wearing a light brown or tan shirt and walking/running with a limp.

A computer check of the displayed Missouri license plate #5CCJ57, on the Dodge Ram pickup at the crash scene, revealed no wants or warrants and Missouri DOR responded registered to a 2002 Dodge pick-up to Erick Hyde at 9542 E. 57th Terrace, Raytown Missouri.

I later responded to 9542 E. 57th Terrace, Raytown Missouri and contacted Mr. Erick Hyde. Mr. Hyde stated he had sold the Dodge pick-up to Teri L. Thompson at 10403 E. 78th Terrace, Raytown, Missouri on 07-02-2019. Mr. Hyde provided me a copy of the bill of sale.

Detective L. Pollard and I, responded to 10403 E. 78th Terrace, Raytown, Missouri and contacted S. Coleman. Mrs. Coleman advised Teri L. Thompson had moved to 3800 E. 93rd Street, Kansas City, Missouri.

Detective L. Pollard and I, responded to 3800 E. 93rd Street and contacted Teri L. Thompson. Mrs. Thompson advised she resided at the residence with her boyfriend, SKYLER WADDELL W/M 02-19-1999. Mrs.

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Thompson admitted to owning a Dodge Ram pick-up. Mrs. Thompson gave us verbal consent to search the residence for SKYLER WADDELL. WADDELL was located hiding in the attic of the residence and he was taken into custody without incident. It should be noted WADDELL matched the physical description, 5'08", 150 lbs, 20 years old, slim build, which was provided by witnesses as the driver of the Dodge Ram pickup at the time of the crash. While escorting WADDELL to my police vehicle to transport him to the South Patrol Detention Unit, he spontaneously stated, "how's that guy doing from yesterday." I told WADDELL I would talk to him at the Detention Unit. While at the residence, Mrs. Thompson agreed to respond to the South Patrol Division to give a statement.

Detective Rives interviewed Teri Thompson. Teri Thompson advised she is currently dating SKYLER WADDELL W/M 02-19-1999, and they reside together. Mrs. Thompson stated SKYLER WADDELL had her Dodge Ram pickup on 11-13-2019. Mrs. Thompson stated when he returned home, she was sleeping at their residence at 3800 E. 93rd Street. Mrs. Thompson stated WADDELL later told her he had been involved in a car crash while he was driving the Dodge Ram pick-up, and he left it on the side of the road because it was stuck. Mrs. Thompson stated WADDELL does steal from time to time to make money. Thompson later explained that WADDELL had told her he was getting into a truck, which was on the side of the road. WADDELL stated to Thompson, a male began running at him after he got out of another vehicle. WADDELL stated he panicked and he drove off in the Dodge truck, but the male attempted to get into the truck through an open rear window. WADDELL stated as he drove off he had to avoid a vehicle on the highway by serving around the vehicle causing him to lose control of the Dodge, where he crashed. WADDELL told Thompson he fled the crash scene on foot. Thompson stated WADDELL arrived home on 11-13-2019 around 1600 hours. Thompson stated when WADDELL came to the bedroom where she was sleeping and he was only wearing shorts, and she stated she wasn't sure what he was wearing when he came home because she was sleeping.

I later interviewed Mrs. Wall, the wife of the deceased victim; Mr. Steven Norris. She stated her husband; Mr. Norris, called her and told her his white Ford F-150 pick-up sustained a flat tire while driving northbound on I-435 Highway, just north of Oldham Road. Mr. Norris advised his wife, R. Wall, to respond to the area of I-435 Highway northbound, where his truck was parked on the shoulder of the highway. Mrs. Wall responded to the scene and met her husband. Mrs. Wall gave Mr. Norris a ride back to their residence to pick up some tools to change the flat tire. When they returned to the scene, where Mr. Norris truck was parked, they observed a slim build white male, who appeared to be under the age of 30 years old, standing on the passenger side of the victim's truck. It should be noted the victim had several tools contained in the bed of his truck, to include painting sprayers, air compressors, ladders and scaffolding. Mrs. Wall stated it appeared the white male was trying to steal her husband's tools inside the truck, but she observed him standing next the passenger side. Mr. Norris exited the passenger side of the witness's vehicle and approached the white male. As Mr. Norris was approaching the white male, he fled to the passenger side of a blue Dodge Ram pick-up. The white male entered the driver's seat from the passenger side door. At that time, Mr. Norris ran around the blue Dodge Ram pick-up driver's door. The white male accelerated the Dodge and swerved into the highway with Mr. Norris hanging onto the driver side bed rail, directly behind the front driver side door. Mrs. Wall followed directly behind the Dodge pick-up, as the suspect swerved the truck, which appeared to Mrs. Wall he was trying to throw Mr. Norris off the side of the truck. Mrs. Wall stated it appeared the white male swerved directly into the center median in an attempt to strike the bridge support. Mrs. Wall stated the truck struck the cable barrier wires and bridge support. Mrs. Wall stated she stopped her vehicle in the #1 lane of northbound I-435 Highway, as the white male fled the scene on foot, eastbound. Mrs. Wall reviewed a photo line-up containing six similar white males,

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including the suspect, SKYLER WADDELL W/M 02-19-1999 in position #2. Mrs. Wall identified the white male in position #2 as the suspect that was driving the Dodge Ram pick-up.

I later attempted to interview WADDELL, but he refused to provide a statement. However, WADDELL stated, "the only thing I will say, I didn't mean do any harm, what so ever, when he got out of his vehicle, he came running at me, and I got into the truck." "That's all I am going to say."

A computer check of WADDELL revealed him to be suspended through Missouri DOR.

Printed Name Det. K. Richardson #4290

Signature

Det. Richardson #4290

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

Judge

Circuit Court of _____ County, State of Missouri.