

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

<b>POLICE NO. :</b>	KC21006374
<b>PROSECUTOR NO. :</b>	095462834
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>TRAVIS S WHITE</b>	)	
<b>3780 Meadow Ln.</b>	)	<b>CASE NO. 2116-CR</b>
<b>Kansas City, MO 64133</b>	)	<b>DIVISION</b>
<b>DOB: 09/11/1981</b>	)	
<b>Race/Sex: W/M</b>	)	
<b>██████████</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT  
WARRANT REQUESTED**

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim  
(565.050-001Y20201399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant attempted to cause serious physical injury to ██████████ by shooting at him, and in the course thereof ██████████ was a special victim as defined by Section 565.002.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count II. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim  
(565.050-001Y20201399.0)**

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The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant attempted to cause serious physical injury to [REDACTED] by shooting at him, and in the course thereof [REDACTED] [REDACTED] was a special victim as defined by Section 565.002.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count III. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim  
(565.050-001Y20201399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant attempted to cause serious physical injury to [REDACTED] by shooting at him, and in the course thereof [REDACTED] was a special victim as defined by Section 565.002.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count IV. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim  
(565.050-001Y20201399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant attempted to cause serious physical injury to [REDACTED] by shooting at him, and in the course thereof [REDACTED] was a special victim as defined by Section 565.002.

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An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

### **Count V. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205299.0)**

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 January 29, 2021, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a white Ford F-350, 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.

### **Count VI. Armed Criminal Action (571.015-001Y20205299.0)**

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) (571.015.2) (571.015.3), RSMo, in that on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of

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punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 VII. Armed Criminal Action (571.015-001Y20205299.0)**

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) (571.015.2) (571.015.3), RSMo, in that on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count 2, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and

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consecutive 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 VIII. Armed Criminal Action (571.015-001Y20205299.0)**

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) (571.015.2) (571.015.3), RSMo, in that on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 IX. Armed Criminal Action (571.015-001Y20205299.0)**

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) (571.015.2) (571.015.3), RSMo, in that on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of

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Assault in the First Degree charged in Count 4, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Assault in the First 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 X. Armed Criminal Action (571.015-001Y20205299.0)**

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) (571.015.2) (571.015.3), RSMo, in that on or about January 29, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count 5, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon 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 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less

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than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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.

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/ Caitlin Brock*  
Caitlin Brock (#67964)  
Assistant Prosecuting Attorney  
415 East 12th Street  
11th Floor  
Kansas City, MO 64106  
(816) 881-3571  
cbrock@jacksongov.org

**WITNESSES:**

1. DET David A. Adair, 1125 Locust, Kansas City, MO 64106
2. DET Jacob W. Dee, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]  
[REDACTED], Kansas City, MO 64106

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5. PO Zachary W. Jenkins, 1125 Locust, Kansas City, MO 64106
6. DET Danielle M. Kincaid, 1125 Locust, Kansas City, MO 64106
7. DET Patrick J. McKenzie, 1125 Locust, Kansas City, MO 64106
8. PO Cole M. Modeer, 1125 Locust, Kansas City, MO 64106
9. DET Kimberly L. Monk, 1125 Locust, Kansas City, MO 64106
10. DET Lauren E. Montgomery-Gist, 1125 Locust, Kansas City, MO 64106  
[REDACTED] Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO  
64106



PROBABLE CAUSE STATEMENT FORM

Date: 1-29-2021

CRN: KC21006374

KC21006140

KC21006155

KC21006194

I, Det. Lauren Montgomery Gist #5654, Kansas City Missouri Police Department, Assault Squad
(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 1-29-2021, at 70th Terrace & Arlington Avenue in
(Date) (Address)

Kansas City, Jackson County Missouri Travis S. White
(County) (Name of Offender(s))

W/M 9-11-1981 committed one or more criminal offense(s).
(Description of Identity)

- Aggravated Assault
Aggravated Assault on LEO
Non-residential burglary
Driving while revoked
Felony eluding
Possession of Stolen Property
Tampering with motor vehicle

The facts supporting this belief are as follows:

KC21006140

On 1-28-2021 at approximately 0900 hours, officers of the Kansas City Missouri Police Department were dispatched to the area of 8131 Indiana Ave, Kansas City, Jackson County, Missouri on a reported disturbance with a weapon. Officers discovered the incident location to be a construction site approximately one quarter of a mile south of the intersection of East 81st Street and Indiana Avenue. Officers contacted two victims,

stated the following: He had been working with and their work trucks were parked on the hill. At approximately 0815 hours, he observed a white truck parked next to theirs, and observed two people walking around their work trucks. He and pulled down the hill to see what was going on, and when the two suspects saw them coming, they got in the white truck and began to leave. and pursued the white truck, and heard a single shot come from the truck. Fearing for their safety, they backed off and watched the truck leave through the business gate onto Indiana Ave. They drove the area and observed a trailer which had not been there before, and observed their shop building to have been broken into (latch and padlock cut) and drag marks in the snow by the door.

stated the following: he and were working when they observed someone on property that should not have been there. Two suspects occupying a white older Ford truck (possibly a F350 or 450) with a dump bed and brown chair and table in the back had cut the lock off one of the buildings and were breaking into it. They drove down towards the suspects, who entered the white Ford and began to drive off.

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followed them. As they were crossing under the bridge (71 Highway) on the property, [REDACTED] saw the driver side window roll down and a black object which he believed to be a gun being held out the window. They heard a loud pop and believed it to be a shot. They stopped and did not chase the suspects any further as they feared for their safety.

[REDACTED] described the suspect vehicle as a white, older model Ford dually pickup with a dump bed and piece of wood furniture in the back.

Kansas City Missouri Detectives responded to the location to further inspect the trailer left by the suspects. A vin plate bearing vehicle identification number (VIN) 4JMBU192691028490 and Retting Enterprises Retco Trailer was located on the A frame tongue of the trailer. A computer check of the VIN number revealed it to be stolen out of Belton, Missouri on 11/04/2020 under CRN: 2020-13474. The trailer was towed to the Kansas City, Missouri Tow Lot under Tow #064818.

**KC21006155**

On 01-28-21, at approximately 1048 hours, [REDACTED] phoned in a stealing report which occurred at 5600 E. 84<sup>th</sup> Terr, Kansas City, Jackson County, Missouri. He advised he was working at that location (Hillcrest Estates Apartments) when he parked a golf cart containing tools and returned several minutes later to find the tools in their bag missing. He reviewed video which showed a white female exit a white truck and take the tools, which were valued at approximately \$300. Surveillance video was later obtained by detectives of the Kansas City Missouri Police Department, which depicted a white Ford F550 enter the apartment complex, and pull up next to the golf cart. A white female wearing a dark mask, pink or red jacket, black hooded shirt/sweatshirt, blue jeans, black boots and socks exited the passenger seat, took the bag from the golf cart, and re-entered the truck which drove away.

**KC21006194**

On 01-28-21, at 1143 hours, officers of the Kansas City Missouri Police Department were dispatched to 5400 E. 84<sup>th</sup> Ter, Kansas City, Jackson County, Missouri for a reported suspicious prowler. They made contact with [REDACTED] an employee of 41 Action News, who stated the following: After receiving an alert on his phone regarding activity at the building, he checked the security cameras since he knew no one should be on the property, and called police. On the video, he observed a white Ford F-550, with a flatbed, back up to a security gate at the location. He observed a male and female exit the vehicle before opening the security gate. The white female had a dark pink and black coat, blue jeans and black boots, and the unknown male had a **gray Cowboys hoodie**, blue jeans and brown boots. Video was provided to detectives. The footage shows the suspects entering a locked, fenced in area which contained a shipping container inside, before backing the truck up to the container and loading the truck with copper pipes. [REDACTED] estimated the loss as approximately \$200,000 and wished to prosecute.

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The suspect vehicle was seen to be a **white Ford F-550 with a dump style bed, DOT number 2090445 on the lower part of the door.** The vehicle was discovered to be stolen out of Miami County, KS (2020-1698). On 1-28-2021 at 1508 hours, the Law Enforcement Resource Center distributed an internal bulletin to all law enforcement officers on the Kansas City Missouri Police Department with a full description of the White Ford-F550 suspect vehicle, to include photos, vehicle identification number and the Department of Transportation number printed on the side of the vehicle. That bulletin indicated that the vehicle and pictured suspects were the suspects in the theft.

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On 01-29-21 at approximately 0131 hours, officers of the Kansas City Missouri Police Department observed the white Ford F-550 from the bulletin and got behind the vehicle, which immediately drove through a parking lot and fled. Officers attempted to stop the vehicle by activating emergency lights and sirens. The vehicle fled and officers pursued due to its involvement with an aggravated assault the day before. Officers pursued the vehicle into Raytown, where Raytown PD also became involved with the chase. During the pursuit, cargo from the truck bed was dumped onto the roadway, and the truck drove into oncoming lanes of traffic on E. 350 Hwy, westbound in the eastbound lanes passing Sterling Ave. At approximately 0141 hours, the occupant of the truck fired multiple shots from a gun at officers in the area of **E. 77<sup>th</sup> St and Arlington Ave, Raytown, Missouri.** No police officers or vehicles were struck, but PO [REDACTED] of Raytown PD observed the driver fire 3-5 shots at him. KCPD officers heard shots and saw PO [REDACTED] swerve to avoid gunfire. The vehicle became stuck in the area of Sunrise Dr and Summit and the driver exited and was taken into custody at 0254 hours. A 12 gauge Mossberg shotgun (serial K724933) was discovered in plain view behind the driver's seat of the vehicle, and a spent 9mm shell casing was recovered from the front passenger seat of the vehicle, and another was recovered from the street near the open driver's door.

Detectives of the Kansas City Missouri Police Department responded to East Patrol Detention and contacted WHITE. CSI personnel also responded to recover perishable evidence (swabs of WHITE's hands for gunshot residue) as well as WHITE's clothing, which included a **gray Cowboys hoodie.** WHITE was read his Miranda rights and agreed to speak with detectives. WHITE stated the following: Yesterday evening (01-28-21), he had walked to his friend Tyler's house in Raytown. Tyler was not there so he borrowed his truck. He did not know the truck was stolen, but acknowledged it had a switch to turn it on and no keys. WHITE began driving to the gas station at 87th St and James A Reed to meet his son. At **87th St and Blue Ridge Blvd, Kansas City, Jackson County, Missouri,** WHITE observed an officer behind him who activated his emergency lights. WHITE "panicked" and did not stop. WHITE drove "all over" for probably an hour while officers pursued him, before finally stopping and surrendering. WHITE stated he was pushing buttons looking for the "turbo" button when the contents of the truck fell out the back. When asked about the shots fired from the truck, WHITE stated he did not shoot. He had picked up an unknown male he did not know, who was at Tyler's house, and agreed to give him a ride. While WHITE was driving, the unknown male (next to him on the bench seat) had fired at officers out of WHITE's window. A short time later the unknown male jumped out of the vehicle, at some point when WHITE drove through "stuff" that officers had trouble following him through. WHITE stated he did not believe his DNA would be on the gun, but he had swept all items off the dash of the truck when he got in it, and

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did not know if the gun might have been up there. WHITE later stated he had attempted to grab the other male's hand to get the gun away, so he could not say if his DNA might be on the gun, but it would not be on the trigger. WHITE later changed his story and stated it was Tyler in the truck with him during the chase, not an unknown male. He did not want to "snitch" on Tyler but stated he was the one shooting. He denied knowing Tyler's last name or any nicknames, and described him as a white male about WHITE's age (mid to late 30s). WHITE acknowledged endangering officers' lives as well as those of other people on the roadway, and acknowledged driving into oncoming lanes and driving while revoked. WHITE denied being involved with the burglaries and theft detailed by Det. Kincaid, and stated he was sleeping in the woods on 01-28-21 until evening when he went to Tyler's house. He stated he had driven the truck before 2 or 3 times, but it had been weeks ago. He stated the photographs of the male wearing a gray Cowboys sweatshirt did not depict him. He denied firing a gun at officers or during the chase. It should be noted that he also stated that 90% of what he told detectives was not "bullshit." WHITE consented to a buccal swab for his DNA.

Detectives reviewed available dashcam video and concluded there was no opportunity for the vehicle to have stopped or slowed to allow anyone out of the vehicle without it being observed by officers and captured on video. The only significant gap in video coverage occurs when the vehicle drove the wrong way on Hwy 350, during which time multiple officers were paralleling in the correct lanes and did not observe anyone entering or exiting the vehicle. The radio traffic was also reviewed.

The vehicle was searched with consent of the owner, and the following items were found: a spent 9mm shell casing in the driver's seat crease; an empty 12 gauge shotgun shell box; a black and gray backpack on the passenger floorboard containing a weapon mounted flashlight, a 7.62x25 caliber pistol (serial LIS4475) with one live round in the chamber, and a magazine loaded with 4 live rounds, and a white sock holding live shotgun shells. A spent 7.62x25 shell casing and spent 9mm shell casing were discovered on the passenger floorboard.

A warrant is requested for WHITE and a bond is requested to be associated with that warrant due to the following factors: The extreme danger of the lengthy pursuit wherein the suspect vehicle dumped cargo and drove into opposite lanes of traffic; the repeated property crimes; and the shots fired, first at the construction workers and subsequently at officers during the car chase.

Printed Name Det. Lauren Montgomery Gist #5654 Signature 

The Court finds probable cause and directs the issuance of a warrant this 29th day of January, 2021.

\_\_\_\_\_  
Judge

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Circuit Court of \_\_\_\_\_ County, State of Missouri.