

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

<b>POLICE NO. :</b>	KC21007944
<b>PROSECUTOR NO. :</b>	095463725
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>BRITT REID</b>	)	
<b>11109 W. 163rd Ct.</b>	)	<b>CASE NO. 2116-CR</b>
<b>Shawnee Mission, KS 66221</b>	)	<b>DIVISION</b>
<b>DOB: 04/28/1985</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Dwi - Serious Physical Injury (577.010-027Y20205404.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.010, committed the **class D felony of driving while intoxicated**, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about February 4, 2021, at or near I-435 & Stadium Drive, Kansas City, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving at an excessive rate of speed, failing to be aware of a disabled vehicle, striking it, and as a result caused serious physical injury to A.Y. (12/15/15).

The range 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 one (1) year 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.

**State vs. Britt Reid**

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

**WITNESSES:**

1. PO Matthew L. Duncan, 1125 Locust, Kansas City, MO 64106
2. PO Karl T. Janning, 1125 Locust, Kansas City, MO 64106
3. PO Jamie D. Lamb, 1125 Locust, Kansas City, MO 64106
4. Felicia L. Miller, Pros. Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. DET Lawrence R. Pollard, 1125 Locust, Kansas City, MO 64106
6. Angela M. Saenz, Pros. Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. Alfredo Vasquez, Pros. Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
8. PO Jeremy A. White, 1125 Locust, Kansas City, MO 64106
9. PO Jordan T. Witcig, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03/31/2021

CRN: 21-007944

I, Det. Lawrence Pollard #5044

(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 02/04/2021, at I-435 and Stadium Drive in

Kansas City, Jackson Missouri, BRITT E. REID W/M 04/28/1984
(County) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

Careless Driving/Vehicular Assault/DWI

The facts supporting this belief are as follows:

On 02/04/2021 at 2110 hours, Kansas City, Missouri Police Officers responded to I-435 and Stadium Drive in, Kansas City, Jackson County, Missouri, on a reported injury crash. Upon arrival it was determined a white, 2020 Dodge Ram pickup bearing Missouri dealer license, D385, had been involved in a crash with two stationary vehicles; a gray, 2009 Chevy Impala bearing Missouri license, LD0Z9G and a silver, 2009 Chevy Traverse bearing Missouri license 04VN4V. A juvenile passenger of the Chevy Traverse, AY (5 years of age) sustained life threatening injuries in the crash.

Members of the Kansas City Missouri Police Department Accident Investigation Section took control of the scene and conducted an investigation. Investigators determined the Dodge Ram being operated by Britt E. Reid (w/m 04/28/1985) was traveling southbound on I-435 south of Stadium Drive in the #4 lane of travel. ACM data obtained under the authority of a search warrant indicated the Dodge's speed was 82.6 MPH in a posted 65 MPH zone 5 seconds before the crash. Approximately 680 feet south of the gore point from the Raytown Road entrance ramp onto southbound I-435, the Chevy Impala had stalled and was stationary facing southbound. At this point the shoulder measured approximately 4.97 feet. The Impala was 1.08 feet from the guardrail leaving 2.2 feet of the vehicle in the #4 lane of travel. Approximately 231 feet south of the stalled Impala, the Chevy Traverse was stopped 2.85 feet from the guardrail leaving the vehicle partially in the #4 lane of travel. Further analysis of the Dodge ACM indicated steering input was normal prior to impact with the Impala and 1.9 seconds prior to the impact with the Traverse, its speed was 83.9 MPH. Reid impacts the front left area of the Impala causing him to steer right then hard left in an attempt to correct while still traveling south. The Ram then impacts the rear of the Traverse at 67.7 MPH.

The night of the crash, initial responding officer made contact with Reid who stated he had left work and was entering southbound I-435 from Raytown Road driving the white, 2020 Dodge Ram. As he was approaching the point where he needed to merge onto the highway, he was looking over his left shoulder to evaluate traffic so he could merge. He struck the Chevy Impala which he did not see as there were no lights on the vehicle. Reid stated he continued southbound where he rear ended the Chevy Traverse. Records indicated Reid called 911 for help at 21:33:03.

Officer J. White of the DUI Unit made contact with Reid at the scene of the crash. Officer White detected an odor of intoxicants and noted his eyes were bloodshot and red. The Horizontal Gaze Nystagmus test was administered and 4 of 6 clues were observed. A search warrant was sought and granted by Jackson County Circuit Court. The warrant was executed 3 hours post-crash and indicated a blood alcohol concentration of .072 and a blood alcohol concentration of .062, 3.5 hours post-crash. Medical records for Reid were obtained under the authority of a court subpoena and revealed a serum blood alcohol concentration of .113 at 2307 hours on 02/04/2021. Reid suffered a blunt force trauma injury to his groin requiring emergency surgery.

## PROBABLE CAUSE STATEMENT FORM

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Contact was made at the scene with Alfredo Vasquez, the occupant of the Chevy Impala. Vasquez stated he left his house and was driving to work at Home Depot in Belton Missouri. His vehicle ran out of fuel as he was traveling southbound on I-435 south of Stadium Drive. He pulled to the right as far as possible and called his cousin, Felicia Miller, to bring him some fuel. Vasquez stated he activated his hazard lights but knew he had a weak battery. Miller arrived on scene in her silver Chevy Traverse and stopped ahead of his stalled vehicle and also pulled to the right. Vasquez filled his vehicle with the fuel brought by Miller and attempted to start his vehicle. When his vehicle wouldn't start, Miller returned to her Traverse and Vasquez entered the trunk of his vehicle through the backseat to obtain his jumper cables. As he made his way back to the front passenger seat of the Impala, his vehicle was struck by another vehicle. Vasquez looked out his front window and saw taillights continuing south towards Miller's vehicle and then striking it.


Contact was made with Felicia Miller at Children's Mercy Hospital. She stated her cousin, Alfredo Vasquez had called her and stated he ran out of fuel. Miller, her sister Angela Saenz and their two children, AY (5 YOA) and JW (4 YOA) got into her Chevy Traverse and drove to southbound I-435 past Stadium. She pulled her Traverse in front of Vasquez's stalled Impala. She brought the fuel to him and watched him fill the car. She said Vasquez attempted to start the Impala and when it wouldn't start, she told him to grab his stuff and meet her at her car. Miller then ran back to her Traverse and got in the driver's seat. She looked in her rearview mirror watching for Vasquez when she saw headlights coming right at her vehicle. Miller stated she felt the impact and was knocked unconscious for a moment after the airbag struck her and broke her seat. When she woke, she was disoriented and began calling for her sister and the children. Miller located her child AY in the rear of the Traverse under where the third seat had folded over. She was unresponsive. An ambulance transported AY to Children's Mercy Hospital for treatment. Medical records were obtained for AY which revealed she suffered the following injuries but not limited to: severe traumatic brain injury, left parietal fracture, brain contusions and subdural hematomas.

On 02/05/2021 detectives responded to the home of Angela Saenz, the passenger in the Traverse, to obtain a statement. Saenz stated her sister, Felicia Miller, picked her up at her residence and they left to go help out their cousin, Javier Vasquez whose vehicle was broken down on Southbound I-435, near I-70. They were in Miller's Chevrolet Traverse, which had 3 rows of seating. She sat in the front passenger seat and her daughter, JW, sat in the second row of seating behind the front passenger seat. Miller's daughter, AY, sat in the third row on the driver's side. When they arrived at Vasquez's vehicle, which was on I-435, just south of I-70, Miller pulled over onto the shoulder less than 10 feet in front of Vasquez. Saenz stated Vasquez and Miller's vehicles were both on the shoulder, off the roadway. Miller activated her vehicle's hazard lights and exited with a gas can to help Vasquez and everyone else remained in the vehicle. Miller returned and sat back down in the driver's seat and stated Vasquez was not out of gas, but his battery was dead. Approximately three minutes later their vehicle was rear-ended. Saenz did not recall much after the crash because she lost consciousness. Saenz and her daughter were transported by EMS to St. Luke's Hospital. Saenz sustained facial lacerations and a concussion and the hospital staff briefly examined JW and were not concerned of any injuries.

A computer check of **Britt Reid** revealed a valid Class C operator's status through the Kansas Department of Revenue with prior alcohol contacts in Pennsylvania and Arizona.

PROBABLE CAUSE STATEMENT FORM

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Printed Name Det. Lawrence Pollard #5044 Signature  #5044

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

\_\_\_\_\_  
Judge

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