

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

<b>POLICE NO. :</b>	21-275823
<b>PROSECUTOR NO. :</b>	095464895
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>FRANCOIS C. ORLOFF</b>	)	
<b>3220 E. 23rd Street</b>	)	<b>CASE NO. 2116-CR</b>
<b>Kansas City, MO 64127</b>	)	<b>DIVISION</b>
<b>DOB: 10/23/1990</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted  
Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-  
003Y20200999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 4, 2021, in the County of Jackson, State of Missouri, **Patsy Arnold** was killed when the vehicle she was operating was struck by a vehicle operated by the defendant as a result of the perpetration of the class E felony of Resisting Arrest by Fleeing under Section 575.150, RSMo committed by the defendant on or about June 4, 2021, in the County of Jackson, State of Missouri.

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. Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk  
Of Serious Injury/Death To Any Person (575.150-002Y20204801.0)**

## **State vs. Francois C. Orloff**

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 E felony of resisting an arrest**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about June 4, 2021, in the County of Jackson, State of Missouri, Officer Pham, a law enforcement officer, was making an arrest of defendant for speeding and tampering with a motor vehicle, and the defendant knew or reasonably should have known that the officer was making an arrest, and, for the purpose of preventing the officer from effecting the arrest, resisted the arrest of defendant by fleeing from the officer and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant operated a motor vehicle at a high rate of speed on 50 Highway, crossing the grass median and colliding with other vehicles in the on coming lanes of traffic.

The range punishment for a class E 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 four (4) 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. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the **class D felony of tampering in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 4, 2021, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile, namely a red Ford Ranger pickup truck.

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.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**State vs. Francois C. Orloff**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Traci A. Stansell*  
Traci A. Stansell (#41903)  
Assistant Prosecuting Attorney  
321 W. Lexington  
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**WITNESSES:**

1. [REDACTED]
2. CPL Charles N. Bradley, 504 E. Blue Pkwy, Lees Summit, MO 64063
3. TPR Cory Bradshaw, 504 E. Blue Pkwy, Lees Summit, MO 64063
4. LT S. A. Coats, 504 E. Blue Pkwy, Lees Summit, MO 64063
5. [REDACTED]
6. [REDACTED],
7. CPL Aaron Engelhart, 504 E. Blue Pkwy, Lees Summit, MO 64063
8. PO Mark Jeffrey, [REDACTED]
9. [REDACTED]
10. SGT Heath A Sears, 504 E. Blue Pkwy, Lees Summit, MO 64063

## PROBABLE CAUSE STATEMENT FORM

Date: June 13, 2021

I, Trooper C.A. Cundiff, a member of the Missouri State Highway Patrol, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that On June 4, 2021, at approximately 1242 hours, on westbound U.S. 50 Highway, east of Milton Thompson in Lake Lotawana, Missouri. Francois C. Orloff, white, Male, date of birth October 23, 1990, and social security number [REDACTED] committed one or more criminal offense(s).

2. The facts supporting this belief are as follows:

1. On June 4, 2021 at approximately 1319 hours, I investigated a traffic crash which resulted from a pursuit initiated by the Lone Jack Police Department. The crash occurred on westbound U.S. 50 Highway, east of Milton Thompson Road in Lake Lotawana, Missouri. As a result of this investigation, Francois C. Orloff, date of birth, October 23, 1990, was arrested for murder 2nd degree, driving while intoxicated-drugs-involving the death of another, assault in the 4th degree and resisting arrest for a felony.

2. On June 4, 2021 at approximately 1310 hours, I responded to a serious injury crash on westbound U.S. 50 Highway in Lake Lotawana, Missouri. I was informed by Troop A Radio that the crash would potentially become a fatal crash, and that the Jackson County Sheriff's Office had one suspect in custody. I arrived on scene at approximately 1319 hours. I was assisted in this investigation by Trooper C.W. Bradshaw, Corporal C.N. Bradley, Trooper D.R. Becker, Sergeant H.A. Sears, Corporal A.A. Engelhart and Lieutenant S.A. Coats. Upon arriving on scene, I saw a red Ford Ranger on it's top in the ditch south of eastbound U.S. 50 Highway of the roadway, a silver Ford Escape in the center of eastbound U.S. 50 Highway and a blue Ford Fusion in the ditch south of eastbound U.S. 50 Highway. Medical personnel were already on scene when I arrived. Trooper Bradshaw had gathered details of the occupants of each vehicle and where they were being transported for treatment of their injuries. Crash Reconstructionist, Corporal Bradley, Trooper Becker, and Crash team member, Sergeant Sears responded to the scene to investigate. While on scene we were notified that a driver identified as Patsy S. Arnold, date of birth, March 18, 1948, died as a result of her injuries. During this investigation, I determined the Ford Ranger, which was being pursued by the Lone Jack Police Department, was traveling westbound on U.S. 50 Highway. The Ford Ranger ran off the roadway to the left, crossed the median and struck the Blue Ford Fusion and then the Silver Ford Escape. The driver of the Ford Ranger then exited his vehicle and continued to flee law enforcement on foot traveling southbound from the crash scene into a nearby wooded area. The driver was shortly apprehended by the Jackson County Sheriff's Office and was identified as Francois C. Orloff, date of birth, October 23, 1990.

3. I spoke with Lake Lotawana Officer M.D. Jeffrey. Officer Jeffrey stated, "I was at 50 and Milton Thompson westbound preparing to deploy spikes. I saw the pickup cross the hill. He immediately crossed the median. He then struck the blue car. He went airborne and turned before hitting the silver SUV. The vehicles just exploded when they collided. The truck came to rest there. After I turned around from protecting myself from the debris. I saw him exit his vehicle and fled southbound. I chased him into the tree line. He was bunkered down. The canine was deployed and I went in to assist on apprehending him." Trooper Becker took photos of the scene. I created uniform Crash Report #9794837, it will be attached to this report. The Ford Ranger was released to Ron's Tow on Vehicle Record #0830060421165756 and placed on an investigative hold. The Ford Fusion was released to Ron's Tow on Vehicle Record #0830060421171606 and placed on an investigative hold. The Ford Escape was released to Ron's Tow on Vehicle Record #0830060421172740 and placed on an investigative hold.

4. I arrived at Centerpoint Medical Center with Corporal Engelhart at approximately 1630 hours. I spoke with the passenger of the silver Ford Escape, Sherrie Huhs, date of birth, August 12, 1956. Huhs stated, "We were going east on U.S. 50 Highway. I told my sister to watch out for the truck in the median. He hit a car in front of me. Then he hit us." We then met with Orloff. At approximately 1704 hours, I placed Orloff under arrest for resisting arrest. Orloff was handcuffed to the hospital bed prior to my arrival. I replaced the handcuffs with mine. I informed Orloff of his rights per Miranda and interviewed him afterwards. Orloff verbally indicated he understood his rights. When asked what had happened prior to the crash, Orloff stated, "I basically wanted to take enough heroine to not live anymore." Orloff said he could not remember when he had taken heroine, but that it was earlier that day. Orloff said he had also taken methamphetamines earlier that day. Orloff stated, "When that didn't kill me, I just started driving faster and faster, weaving in and out of traffic and I just wanted to die. I just jumped the curb and drove head on into traffic in an attempt to commit suicide." Orloff said he had stolen the truck earlier that day and that he knew the truck did not belong to him. When asked if he had used any drugs after the crash, Orloff stated, "I did try to shoot up some heroine in the woods, but the needle broke." Orloff said he had taken PCP and smoked marijuana earlier that day. Orloff said he was the only one in the vehicle. Orloff's speech was rapid, choppy, slurred and he rambled as he spoke. Orloff stated that he was "unbelievably impaired." I requested Orloff perform a series of field sobriety tests. Orloff consented to the tests. The tests are as follows:

A. Horizontal Gaze Nystagmus:

Orloff was instructed to keep his head still and to follow the stimulus with his eyes only. Orloff's eyes were bloodshot and glassy. Orloff did not display horizontal gaze nystagmus in either eye.

B. Romberg:

Orloff was instructed to close his eyes and estimate when 30 seconds had passed. Orloff stated that he understood the test. after 21 seconds had passed Orloff had said that was time. When asked how many seconds had passed Orloff stated, "30 seconds."

C. Counting:

Corporal Engelhart asked Orloff if he was able to count from 1 to 100. Orloff said yes. Corporal Engelhart instructed Orloff to count down from 87 to 66. Orloff said he understood the test. Orloff stated, "87, 86, 85, 84, 83, 82, 81, 80, 79, 78, 76, is that what it was? Oh 75, 74, 73, 72, I forgot what number you said. 73, 71, 72, 73, Um 69, 68, 67, 66, 65, 64, 63, 62, 61." Corporal Engelhart stopped Orloff after this point.

5. Based on my observations and results of the field sobriety tests, I informed Orloff he was also under arrest for driving while intoxicated at approximately 1715 hours. I informed Orloff of implied consent per page two of the Alcohol Influence Report at approximately 1717 hours. I requested Orloff provide a sample of his blood. Orloff consented to providing his blood and at approximately 1728 hours provided a sample of his blood. Due to his injuries, Orloff was released to Centerpoint Medical Center staff for treatment.

6. On June 7, 2021, I received consent from the owners of all three vehicles involved in the crash to download Electronic Data Recorder. Sergeant Sears completed the downloads of the Electronic Data Recorders on all three vehicles on June 8, 2021. On June 8, 2021, I received a copy of the Lone Jack Police Department's investigative report #21-057. A copy of this report will be sent to the prosecutor's office with this report. I also received video footage from the Lone Jack Police Department's in car and body worn cameras. Two copies of these videos will be sent to the prosecutor's office with this report. On June 8, 2021, I received a copy of the Kansas City Police Department's stolen vehicle report #KC21035747. A copy of this report will be sent to the prosecutor's office with this report.

7. I contacted the driver of the blue Ford Fusion involved in the crash. Jessica Schornheuser, date of birth, August 27, 1990. Schornheuser stated, "I was driving home from work. I was traveling eastbound on 50 Highway. I was in the left lane. I glanced over because I saw a cop carrying a plastic barricade running at the highway. When I looked back the truck was right in front of me. It all happened so fast. I believe I tried to swerve because the truck was in the left lane. Then I was in the ditch." I contacted two more witnesses involving this crash. The first witness was Stacey Nanos, telephone number [REDACTED]. Nanos stated, "'I passed the Lone Jack officer. I was heading westbound. The red truck was behind me and passed me. I saw the truck run into the median. It looked like it was avoiding the officer that was going to deploy the spikes. I saw the pickup hit the other two cars. We helped the people in the car and stayed with them until the ambulance came. I saw the guy in the truck. He was moving around a little bit and then he ran.'" The second witness was Tina Cox, telephone number [REDACTED]. Cox was the passenger in the vehicle with Nanos. Cox stated, "'We were on 50 highway. The red truck, we had passed him at some point before the chase had happened in Johnson County. We passed the Lone Jack cop. Not too much later, my husband says, 'he is chasing this guy'. They weren't going too fast at first but then they sped up. They almost hit us. As soon as they passed us the speed escalated. There were a lot of cars around. Not too long after they passed us is when the red truck went off into the median. We saw the officer with spikes up ahead. You can tell he was trying to turn but he hit that first car and hit right into Patsy's car. Once he hit that car the truck rolled. Once the crash happened, me and my husband got out and assisted Patsy's car. When we got there, Patsy was conscience. She lost conscientiousness shortly.'"

7. Corporal Engelhart completed a supplemental report for this incident. His report will accompany this report when sent to the prosecutor's office.

8. Corporal Bradley will be completing a Crash Reconstruction Report. His report will accompany this report when sent to the prosecutor's office.

9. Orloff was issued Uniform Citations for driving while intoxicated- drugs-involving the death of another not a passenger and resisting arrest or interfering with an arrest for a felony. Charges for Murder 2nd Degree will be sent to the Jackson County Prosecutor's Office for the filing of formal charges.

10. A check of Orloff's criminal history revealed an extensive history dating back as early as 2008. Orloff has had multiple arrests and convictions for tampering and stealing. A look of Orloff's criminal history also revealed arrests for resisting arrest for a felony, escaping custody for a felony and leaving the scene of an accident.

11. This investigation continues and any additional charges will be included on a supplemental report.

12. This case is closed.

Tpr. C.A. Cundiff #377

Missouri State Highway Patrol

Trooper C.A. Cundiff #377

Officer's Printed Name

Tpr. C.A. Cundiff

Officer's Signature

6-14-2021

Date