

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

POLICE NO. :	2022-003867
PROSECUTOR NO. :	095467914
OCN:	007658

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
STEVEN E. THOMAS)	
8803 Leeds Road)	CASE NO. 2216-CR
Kansas City, MO 64129)	DIVISION
DOB: 01/11/2001)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Robbery - 1st Degree (570.023-001Y20201207.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about January 19, 2022, in the County of Jackson, State of Missouri, the defendant forcibly stole a black 2006 Ford F-350, in the possession of D.G., and in the course thereof the defendant was armed with a deadly weapon.

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. Armed Criminal Action (571.015-001Y20205212.0)

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 January 19, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant

State vs. Steven E. Thomas

committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a 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 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.

Count III. Assault - 2nd Degree (565.052-001Y20201305.0)

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 D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 19, 2022, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED] DOB 10/24/2016, by crashing into a vehicle where [REDACTED] was a passenger.

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.

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

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 E felony of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about January 19, 2022, in the County of Jackson, State of Missouri, Officer Rhyne, a law enforcement officer, was attempting to make a lawful stop of defendant, and the defendant knew or reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, resisted the stop of defendant by fleeing from the officer and

State vs. Steven E. Thomas

defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant fled at high speeds into oncoming traffic and striking multiple vehicles.

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.

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/ Hallie L. Schuman
Hallie L. Schuman (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4488
HSchuman@jacksongov.org

WITNESSES:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. [REDACTED]
6. [REDACTED]
7. [REDACTED]
8. [REDACTED]
9. [REDACTED]
10. [REDACTED]

10. DET Kurt Wyckoff, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 1/19/2022

Report #: 2022-3867

I, Kurt Wyckoff, a Detective with the Independence, Missouri, Police Department, 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 1/19/2022, at 1358 hours, Steven E. Thomas, (Race- black, Sex- male, DOB- 01/11/2001, Address-613 NE Columbus, Lee's Summit MO, 64086, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 01/19/2022 at approximately 1358 hours, Steven E. Thomas, herein referred to as **DEFENDANT**, conducted an armed robbery by threatening a person with a gun and taking his truck. The **DEFENDANT** then resisted arrest by fleeing, ultimately resulting in a vehicular accident. Upon striking five uninvolved vehicles the **DEFENDANT** attempted to flee on foot. This occurred in Independence Missouri, Jackson County.

On 01/19/2022 Independence Officer Byrum was dispatched to 1237 S. Harris in regards to an armed robbery. The [REDACTED] stated that he was in the street in front of his house putting license plates on a truck he recently purchased, a black 2006 Ford F-350 bearing Missouri License 6PF-E04. He stated that he turned around and observed two subjects behind him. He stated that the **DEFENDANT** then produced a black handgun and pointed it at him as he stated "Give me your car". [REDACTED] stated that he removed the keys from his sweatshirt pocket and gave them to the **DEFENDANT** because he was in fear of his life. He stated that both subjects then got into his truck and drove off. He stated that the **DEFENDANT** was driving when he last saw them. [REDACTED] stated that he then called 911.

Independence Dispatch received the call and broadcasted the stolen auto information on all Independence frequencies.

Officer Rhyne then located the stolen truck near the intersection of Noland Rd and Fair St. Officer Rhyne activated his emergency lights and conducted a traffic stop in the McDonald's parking lot at 1417 hours. The **DEFENDANT** briefly stopped the truck and Officer Rhyne exited his patrol vehicle. The **DEFENDANT** then began driving and the pursuit began.

The **DEFENDANT** drove around the McDonald's and entered Noland Rd by going southbound in the northbound lanes. Assisting units arrived in the area and pursued the **DEFENDANT**. The **DEFENDANT** crossed the median to get back into the southbound lane of Noland Rd. and accelerated. The **DEFENDANT** proceeded southbound at speeds ranging from 70 to 97 miles per hour. The **DEFENDANT** passed 26 cars while travelling southbound on Noland Rd. Dash cameras show the **DEFENDANT** running a red light at Noland/Noland Ct. travelling approximately 86 miles per hour. Throughout the pursuit the **DEFENDANT** utilized the middle turn lane to pass vehicles.

As the pursuit approaches I-70 traffic on southbound Noland Rd. becomes more prevalent. The **DEFENDANT** is able to squeeze past two vehicles but appears to strike a Jeep Compass at which time it appears the **DEFENDANT** loses control of the truck. The **DEFENDANT** cannot maintain control of the steering and then strikes five vehicles that were in the northbound lanes of Noland Rd. The truck is disabled after the crash. The **DEFENDANT** then exits the truck and runs eastbound in an attempt to elude officers. Officers pursue the **DEFENDANT** on foot and he is taken into custody after a brief struggle.

The vehicle pursuit was 1:53 minutes long, starting at 1417 hours with the crash occurring at 1418:53 hours.

The first vehicle that the **DEFENDANT** struck head-on was a 2016 Ford flex occupied by [REDACTED] was secured in a booster seat in the rear passenger seat of the vehicle. Officers on scene observed [REDACTED] to have large lacerations to her head, exposing brain matter [REDACTED]. [REDACTED] was transported to Children's Mercy hospital. At the time of this report [REDACTED] has multiple skull fractures, bleeding of the brain, and multiple lacerations to her face, arms, and hands. [REDACTED] suffered a concussion, lacerations to arms, and broken teeth. [REDACTED] has a broken sternum from the accident.

In total, as a result of the traffic crash, 5 vehicles were towed from the scene and 3 people were transported to local hospitals with injury.

On 01/19/22 Detective Wyckoff interviewed the **DEFENDANT**. He was read his warning of rights and stated that he understood his rights. The **DEFENDANT** stated that he had been with his cousin on today's date. He identified his cousin as "Marquis" or "Q". He stated that Q is not his actual cousin and he does not know his real name or where he lives. He stated that Q got him into contact with a subject named "P". He stated that "P" was the owner of the truck he crashed. He stated that he drove "P" around the metro all day. He stated that after they were done driving around "P" attempted to rob him at gunpoint, at which time he took "P's" truck. He stated that he was then followed by "P". He stated that he saw that officers were trying to stop him but he was "scared" so he refused to stop. He stated that he then ran from the truck because he was again scared. The **DEFENDANT** could not describe "P" or identify the color of the truck that he claimed to have been driving all day.

The **DEFENDANT** stated that he was sorry that a child was injured in the accident that he caused.

On 01/20/22 Detective Minter conducted a formal interview with the victim of the robbery, [REDACTED] [REDACTED] gave the same account of the incident as he did the day prior. He stated that he had never seen the **DEFENDANT** prior to the **DEFENDANT** pointing a gun at him and demanding the keys to his Ford F-350. He stated that after the robbery he got into his Nissan Maxima to go look for his truck. He stated that he observed the truck parked at the Community of Christ church at which time he parked a few hundred yards from it and called 911 to give them the update. He stated that the truck then left the parking lot and he followed it eastbound on 23rd St. He stated that while on 23rd St he called 911 again and also flagged down an Officer

that was travelling westbound. He advised that Officers were able to catch up to the truck at 23rd and Noland Rd. He stated that he then went back home and waited for the reporting Officer.

█████ stated that it was possible that there was another occupant with the **DEFENDANT** in the truck but he could not see anyone enter the truck on the passenger side from his perspective. He stated that due to the dark tint of the truck he could not tell if there were two people in the truck when he was following it. █████ stated that after the crash he went to the scene and identified the **DEFENDANT** to be the person that pointed the gun at him and stole the truck.

A gun was not located in the truck or in the creek bed where the **DEFENDANT** was apprehended.

Kurt Wyckoff

/s/Kurt Wyckoff

Print Name

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge