

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	22-006352
PROSECUTOR NO. :	095471052
OCN:	

STATE OF MISSOURI,

PLAINTIFF,)

VS.

CAMDEN E. HAGER

717 SE Pierre Ct.

Lees Summit, MO 64063

DOB: 03/15/1999

Race/Sex: W/F

DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

Count I. Dwi - Bac > Or =.18 And Death Of Person (577.010-035Y20205499.0)

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 B felony of driving while intoxicated – resulting in death**, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about August 24, 2022, at or near 1301 NE Windsor, Lee's Summit, 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 over a curb in a parking space at Fairfield Inn, striking the victim and pushing her body into the hotel building and as a result caused death to S.S., and defendant had eighteen-hundredths of one percent or more by weight of alcohol in her blood at the time of the collision.

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.

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. Camden E. Hager

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/ Traci A. Stansell

Traci A. Stansell (#41903)
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WITNESSES:

1. [REDACTED]
2. PO James Brock, 10 NE Tudor, Lee's Summit, MO 64086
3. PO Chris Drake, 10 NE Tudor, Lee's Summit, MO 64086
4. Fairfield Inn, 1301 NE Windsor Dr., Lees Summit, MO 64086
5. SGT Jennifer Kudzinski, 10 NE Tudor Rd., Lees Summit, MO 64086
6. PO Kent Miller, 10 NE Tudor, Lee's Summit, MO 64086
7. PO Lukas Pace, 10 NE Tudor Road, Lees Summit, MO 64086
8. [REDACTED]
9. [REDACTED]
10. PO Tim Warner, 10 NE Tudor, Lee's Summit, MO 64086

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 22-06352

Date: 08-25-2022

I, Michael Perkins, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 08-24-2022, at 1301 NE Windsor Dr. City of Lee's Summit, Jackson County 64086, Camden E. Hager, W/F, 03-15-1999, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 08-24-2022 at about 1917Hrs., the Lee's Summit Police Department received 911 calls reporting an injury crash at the Fairfield Inn located at 1301 NE Windsor Dr. Lee's Summit, MO. Officers arrived on the scene and found that a 2015 Black Ford Focus had struck a pedestrian and then struck a building. Ofc. Pace arrived on the scene and began CPR on the pedestrian. The Lee's Summit Fire Department Ambulance was called to the scene and they continued CPR measures on the pedestrian who was identified as Sandra N. Sipple, B/F, 06-14-2001. Sipple was transported to Centerpoint Hospital by ambulance where she was later pronounced dead due to her injuries. Significant damage to the building at 1301 NE Windsor Dr. (Fairfield Inn).

The crash investigation showed that Sipple was seated on the curb in the parking lot at 1301 NE Windsor Rd. where vehicles park. Sipple was struck by Hager's vehicle and was pushed/pinned into the wall of the building sustaining severe injuries. After impact, Hager backed her vehicle up about 23 feet from the building.

Ofc. Pace made contact with Camden E. Hager. Hager stated that she was driving her 2015 Ford Focus in the parking lot at 1301 NE Windsor Dr. Lee's Summit, MO (Fairfield Inn) and she was attempting to park in a marked parking space. Hager stated that she did not know what happened and she hit the wall. The crash severely injured the pedestrian and caused significant damage to the building. Ofc. Pace could smell an odor of intoxicants on Hager's breath and he began an investigation for driving while intoxicated on Hager.

Ofc. Pace asked Hager if she had anything to drink and stated that he could smell an odor of alcohol on her. Hager said she had a couple of glasses of Sangria while having dinner with her dad. Hager's speech was slurred when she spoke. Ofc. Pace asked Hager to perform field sobriety tests and she agreed to do so. While walking to the area where the field sobriety tests were going to be administered, Hager spontaneously stated "well I'm not going to pass the Breathalyzer but...".

Ofc. Pace administered field sobriety tests on Camden Hager and observed the following:

Horizontal Gaze Nystagmus (explained):

- Ofc. Pace smelled a strong odor of alcoholic beverages emitting from Hager's breath when standing in front of her.
- Camden's eyes were bloodshot and glassy
- pupils were dilated
- Camden confirmed she understood the instructions
- She was not wearing corrective lenses or contacts and she was not blind in either eye

- Camden's eyes tracked equally, her pupils were of equal size, and resting nystagmus was not detected
- Lack of smooth pursuit was present in both eyes
- Distinct and sustained nystagmus at maximum deviation was present in both eyes
- Onset of HGN prior to 45 degrees was present in both eyes
- Vertical Gaze Nystagmus was present in both eyes
 - checked for VGN three times because she moved her head upward multiple times
- Camden swayed noticeably during the test

The walk and turn test was not administered because Camden stated she had problems with her right hip and they would affect the test.

One Leg Stand (explained and demonstrated):

- Camden confirmed she understood the instructions and there was no reason she could not complete the test other than her right leg may shake due to her hip injury
- Camden stood on her left leg
- She swayed noticeably during the test
- Camden began counting at "One thousand two"
- She put her foot down once and did not continue the test

Ofc. Pace asked Camden if she would be "over the legal limit" and she replied "breathalyzer-wise, yeah. I'm going to be honest with you.". Ofc. Pace asked Camden to submit to a preliminary breath test (PBT). Camden agreed. The result of the PBT showed positive for the presence of alcohol with a reading of .203. Based on the totality of the circumstances, Ofc. Pace arrested Camden Hager for driving while intoxicated. Once in custody, Hager stated "I told you it was going to be over the legal limit" and then laughed.

Ofc. Pace transported Camden to Lee's Summit Jail where he read her Missouri Implied Consent and requested Camden submit to a chemical test of her breath. Camden agreed to the breath test. At 2006Hrs., the breath test was conducted and it showed Camden had a Br.A.C. level of .188.

During an interview with Ofc. Pace, Camden stated the following:

1. Admitted to driving the vehicle at the time of the crash
2. Had not consumed any intoxicants after the crash
3. Confirmed that she was under the influence of an alcoholic beverage
4. Indicated she drank three to four Sangrias while eating dinner at her place of employment
5. She began drinking at 1330Hrs and stopped "a little after 6 pm"

Camden indicated that she takes medication for ADHD, Depression, and Anxiety. Ofc. Pace re-read Missouri Implied Consent and requested that Camden submit to a chemical test of her blood. Camden agreed to the test. Camden was transported to Lee's Summit Medical Center where a blood sample was taken.

A criminal history check was conducted and Camden Hager has the following past arrests/convictions:

1. 03-17-2021 – Lee's Summit MO PD – DWI – Guilty SIS

Michael Perkins #0810
Name

/s/ Michael Perkins
Signature