IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT

KC22069237
095471690
HS036510
)
NTIFF,)
)
)
) CASE NO. 2216-CR
) DIVISION
)
)
)
DANT.)
PLAINT

Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)

WARRANT REQUESTED

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 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 October 12, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm from a black Lincoln Continental, 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 II. Armed Criminal Action (571.015-001Y20205213.0)

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 on or about October 12, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 1, 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.

State vs. Kammron C Tucker

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. 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.

Count III. Assault - 2nd Degree - Special Victim (565.052-004Y20201310.0)

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 B felony of assault in the second degree, punishable upon conviction under Section(s) 558.002 and 558.011, RSMo, in that on or about October 12, 2022, in the County of Jackson, State of Missouri, the defendant attempted to cause physical injury to Officer special victim, by means of a deadly weapon by shooting at Officer.

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 IV. Armed Criminal Action (571.015-001Y20205213.0)

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 on or about October 12, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the second 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 second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

State vs. Kammron C Tucker

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. 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.

Count V. Assault - 2nd Degree - Special Victim (565.052-004Y20201310.0)

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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 (571.015-001Y20205213.0)

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 on or about October 12, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the second degree charged in Count 5, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

State vs. Kammron C Tucker

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/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
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Floor 7M
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WITNESSES:

- 1. DET David A. Adair, 1125 Locust, Kansas City, MO 64106
- 2. CST Leah Davis, 2645 Brooklyn Ave., Kansas City, MO 64127
- 3. PO Kegan J. Gemmell, 1125 Locust, Kansas City, MO 64106
- 4. MO 64106
- 5. CST Kellie Green, 2645 Brooklyn Avenue, Kansas City, MO 64127
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- 9. PO Carlos A. Mena, 1125 Locust, Kansas City, MO 64106
- 10. DET Lauren E. Montgomery-Gist, 1125 Locust, Kansas City, MO 64106
- 11. PO Antoney H. Perez, 1125 Locust, Kansas City, MO 64106
- 12. PO Kenneth G. Secaida, 1125 Locust, Kansas City, MO 64106
- 13. <u>64106</u>

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT

POLICE NO.:	KC220	69237
CCUTOR NO.:	095471	731
OCN:		
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PLAI	NTIFF,)
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DEFEN	DANT.	<u>)</u>
COMP	LAIN	<u>r</u>
ARRANT I	REOU	ESTED
	CCUTOR NO. : OCN: PLAIN DEFEN COMP	CCUTOR NO.: 095471

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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 II. Armed Criminal Action (571.015-001Y20205213.0)

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 on or about October 12, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 1, 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 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. 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.

Count III. Assault - 2nd Degree - Special Victim (565.052-004Y20201310.0)

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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.

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assault in the second 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. 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.

Count V. Assault - 2nd Degree - Special Victim (565.052-004Y20201310.0)

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 B felony of assault in the second degree, punishable upon conviction under Section(s) (558.002 and) 558.011, RSMo, in that on or about October 12, 2022, in the County of Jackson, State of Missouri, the defendant attempted to cause physical injury to Officer Jackson applied a police officer and special victim by means of a deadly weapon by shooting at Officer

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 (571.015-001Y20205213.0)

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 on or about October 12, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the second degree charged in Count 5, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the second 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. 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.

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/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
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WITNESSES:

- 1. DET David A. Adair, 1125 Locust, Kansas City, MO 64106
- 2. PO Kenneth G. Davis, 1125 Locust, Kansas City, MO 64106
- 3. CST Leah Davis, 2645 Brooklyn Ave., Kansas City, MO 64127

- 4. CIV Stephanie Fagan, 1125 Locust, Kansas City, MO 64106
- 5. PO Kegan J. Gemmell, 1125 Locust, Kansas City, MO 64106
- 6.
- 7. CST Kellie Green, 2645 Brooklyn Avenue, Kansas City, MO 64127
- 8. CST Megan Ingram, 2645 Brooklyn Ave., Kansas City, MO 64127
- 9. PO Shane M. Johnson, 1125 Locust, Kansas City, MO 64106
- 10. PO Eric J. Joy, 1125 Locust, Kansas City, MO 64106
- 11. CST Eden Kuhn, 1125 Locust, Kansas City, MO 64106
- 12. PO Carlos A. Mena, 1125 Locust, Kansas City, MO 64106
- 13. DET Lauren E. Montgomery-Gist, 1125 Locust, Kansas City, MO 64106
- 14. DET Dennis J Paquette, 1125 Locust, Kansas City, MO 64106
- 15. PO Antoney H. Perez, 1125 Locust, Kansas City, MO 64106
- 16. PO Kenneth G. Secaida, 1125 Locust, Kansas City, MO 64106
- 17. CST Kelli Sharp, 2645 Brooklyn, Kansas City, MO 64127
- 18. PO 64106
- 19. CST Greg VanRyn, 6633 Troost, Kansas City, MO 64131

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT

POLICE NO. :	KC22069237
PROSECUTOR NO.:	095471689
OCN:	HS036503
STATE OF MISSOURI,)
PLAI	NTIFF,)
VS.)
)
ZABDIEL B. CABALLERO-OCHOA)
11141 E. 27th Street, Apt. #5) CASE NO. 2216-CR
Independence, MO 64052) DIVISION
DOB: 01/27/1999)
Race/Sex: W/M)
)
DEFEN	(DANT.)
COMP	PLAINT

COMPLAINT WARRANT REQUESTED

Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 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 October 12, 2022, at E TRUMAN RD, in the County of Jackson, State of Missouri, the defendant acting alone or purposefully in concert with others, knowingly discharged a firearm from a black Lincoln Continental, 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 II. 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

RESISTING A LAWFUL STOP OR DETENTION

NOTE: The verdict director for this charge requires proof that the defendant knew or reasonably should have known the basis for the stop/detention.

State vs. Zabdiel B. Caballero-Ochoa

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 October 12, 2022, in the County of Jackson, State of Missouri, Officer Gena and Officer Stewart, law enforcement officers, were attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officer(s) were making a lawful stop, and, for the purpose of preventing the officer(s) from effecting the stop, resisted the stop of defendant by fleeing from the officer(s) 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 for approximately 3.5 miles from Truman Road and Oakland Avenue to E.23rd St and Topping at a high rate of speed up to 100 miles per hour.

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/ Kristiane N. Bryant
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- 3. PO Kegan J. Gemmell, 1125 Locust, Kansas City, MO 64106
- 4. PO Joshua Gena, 223 N. Memorial Drive, Independence, MO 64050

State vs. Zabdiel B. Caballero-Ochoa

- 5. CST Kellie Green, 2645 Brooklyn Avenue, Kansas City, MO 64127
- 6. PO Shane M. Johnson, 1125 Locust, Kansas City, MO 64106
- 7. PO Eric J. Joy, 1125 Locust, Kansas City, MO 64106
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- 9. PO Carlos A. Mena, 1125 Locust, Kansas City, MO 64106
- 10. DET Lauren E. Montgomery-Gist, 1125 Locust, Kansas City, MO 64106
- 11. PO Antoney H. Perez, 1125 Locust, Kansas City, MO 64106
- 12. PO Kenneth G. Secaida, 1125 Locust, Kansas City, MO 64106
- 13. PO Dustin Stewart, 223 N. Memorial Drive, Independence, MO 64050

CRN: KC22060237

UUW ACA		
Felony Eluding Aggravated Assault on LEO		
(Description of Identity	7)	
B/M 05-12-95, W/M 01-27-99, B/M 10-		committed one or more criminal offense(s).
(County)		(Name of Offender(s))
Kansas City, _Jackson	Missouri	Kammron C. TUCKER, Zabdiel CABALLERO- OCHOA, James L. GANT
	(Da	ate) (Address)
I have probable cause to believe that on	10-12-22	, at E. Truman Rd/Manchester Ave in
knowing that false statements on this for	m are punis	shable by law, state that the facts contained herein are true.
(Name and identify law enforcement officer	, or person ha	ving information as probable cause.)
I, Det. Lauren Montgomery Gist #5654	l, Kansas C	Tity Missouri Police Department, Assault Squad
Date. 10-14-22		CRIVRC22007237

The facts supporting this belief are as follows:

Date: 10-14-22

On 10-12-22 at approximately 1037 hours, officers of the Kansas City Missouri Police Department were dispatched to the area of I-70 and I-435, in Kansas City, Jackson County, Missouri, to assist Independence PD in the pursuit of a vehicle which had fired shots at them. Upon arrival, KCPD officers assisted Independence officers in the capture of 3 suspects which fled from the scene on foot, leaving their vehicle (a 2007 black Lincoln Continental MKX bearing Missouri license XG0W3Y, VIN: 2LMDU88C87BJ08944) at the on ramp to I-435 NB from 40 Hwy. The driver of the vehicle, Zabdiel B. CABALLERO-OCHOA, was taken into custody by Independence officers at the vehicle and did not flee. A party subsequently identified as Kammron C. TUCKER B/M 05-12-95 was taken into custody by KCPD officers directly in front of 2906 Wallace Ave. At that time he was sweaty and had several minor abrasions to his elbows. He had a cellphone in his hands displaying a Google map navigation for 1621 Belmont Ave. TUCKER spontaneously told officers he had been in a fight earlier in the morning and broke his hand, and "they say I shot at him." TUCKER complained of a possibly broken hand and vomited, and was transported to a local hospital. A juvenile suspect was also taken into custody with a Smith and Wesson M&P .380 handgun in his pocket, which was reported stolen out of KCMO. A fourth suspect (RAC) was taken into custody, but it was later discovered he was not an occupant of the suspect vehicle and had run from police due to existing warrants.

Detectives responded to the scene, and obtained surveillance video from 7014 E. Truman Rd, which depicts a portion of the car chase including a view of the right rear passenger, a black male wearing a dark colored hoodie and a gold watch, leaning out of the window firing a black handgun. Independence PD dashcam video was also obtained, which depicted the entire vehicular pursuit beginning with the attempted car stop and including multiple incidents of gunfire from the suspect vehicle towards officers. A silver 9mm Taurus handgun was recovered with the slide locked back on the ground just outside the suspect vehicle. An extensive area canvass

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with a K-9 revealed 3 spent 9mm shell casings and a live round along the pursuit path, and also revealed an additional black 9mm handgun which was thrown after the suspect vehicle stopped. Six 9mm shell casings and one live round were located within the suspect vehicle after service of a search warrant. An additional firearm was thrown from the vehicle during the pursuit when the vehicle was driving on I-435 Highway. That firearm has not yet been located.

Both Independence police officers who were shot at during the pursuit responded to KCPD headquarters to provide statements. No officers were injured and their vehicle was not struck by gunfire. In total, the course of the chase was approximately 3.4 miles (GPS approximation using a route from the start and end point). The pursuit began at speeds of 78 mph on city streets, reaching speeds of 86 mph at approximately Truman Rd/Oakland Ave and of 100 mph on E. 23rd St from Topping Ave. The suspect vehicle struck a curb while entering 435 SB from 23rd St, flattening the front passenger tire. Speeds on the highway reached 70 mph due to the vehicle being partially disabled, and it finally came to a stop on the on-ramp to 435 NB from US 40 Hwy.

Independence PO stated the following: Today, he and his partner PO (driving) were dispatched to 1234 S. Franklin Ave in Independence for a reported aggravated assault. They contacted a female victim who stated she saw a black male in his 20s or 30s with a white hoodie and a white male with long blond curly hair inside her brother's truck, and yelled at them. The black male pulled a gun and pointed it at her, and both suspects ran from the scene, dropping 9mm and 22 caliber ammunition boxes. The officers also contacted the owner of the truck who stated he believed his Sig Sauer 9mm pistol was missing, but he was not certain if he had left it in his vehicle or not. Later, PO treceived information from an informant that the two suspects from the assault were back on Franklin Ave. They returned to the area and conducted surveillance before receiving further information that the suspects had just been picked up by a black SUV. They immediately saw a black SUV which passed them, and a black male with dreads in the front passenger seat saw them and turned his head away to avoid eye contact. In the back middle seat, they saw a white male with long blond hair. There appeared to be 4-5 occupants total. PO and PO decided to stop the vehicle due to two occupants matching the description of the suspects, and the fact that the driver was not wearing a seatbelt. They activated emergency lights and initiated a vehicle stop on Truman Rd and Menown Ave (Independence, Jackson County, Missouri). The vehicle began to pull over, then took off, and they initiated a pursuit with lights and sirens activated. At approximately the same time, a black male occupant in the right rear passenger seat stuck a black handgun out the window and fired a single shot in the air. As they pursued the vehicle westbound on Truman Rd, the same party shot in the air approximately 3 more times. The initial shots seemed directed straight up and not at them. However, on the Truman bridge (approximately Truman Rd/Manchester Ave in Kansas City, Jackson County, Missouri), the same suspect shot directly at them a couple of times, leaning out of the window. They fell behind to create more distance, and continued to pursue the suspect vehicle over the bridge. It then turned southbound into the neighborhood, and there were no more shots fired for some time. The vehicle turned southbound onto Topping Ave, and turned eastbound onto 23rd St. At this point the same suspect began shooting at them again, an unknown number of times. The suspect vehicle then attempted to turn onto 435 Hwy southbound, but popped the right rear tire on a curb. They continued southbound on 435, with the suspect firing at them repeatedly, with bullets audibly passing them. PO had his gun drawn but decided against firing due to the potential danger to oncoming traffic and any other vehicles in the area. Just north of the 40 Highway exit, the suspect threw an object which appeared to be a black handgun out of the window. They continued to pursue the vehicle as it continued on 40 Hwy. The suspect vehicle then got on the on-ramp to 435 (northbound), and all passengers

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bailed out of the vehicle and fled. The driver remained in the vehicle and was taken into custody by other Independence officers. They did not return fire at any point. PO wished to press charges and felt his life was in danger during the pursuit. He described the suspect firing shots as a black male in his 20s to 30s, wearing all dark clothing including a blue or black sweater (possibly a hoodie), with dreads and a dark complexion. He was unsure if he would recognize him. PO a was in full uniform with his Independence Police Department badge displayed. His vehicle was a fully marked Independence police vehicle and their lights and sirens were activated throughout the chase, from the time the suspect vehicle fled from them.

Independence PO stated the following: He and PO were riding as a two person crew in a marked patrol vehicle. He stated an aggravated assault had occurred earlier in the day at 1234 S Franklin St, Independence, Mo. He was advised by a source that the suspects of the aggravated assault were driving a black SUV and were back at 1234 S Franklin Dr, and while conducting surveillance at the residence, he observed a black Lincoln MKX SUV leave. PO Stewart began following the suspect vehicle in his marked patrol vehicle, and turned on his overhead lights to conduct an investigative stop. The vehicle initially pulled over as if it was going to stop but then fled. He turned on his sirens and initiated a vehicle pursuit. Near the intersection of Truman Rd/Stark Ave. He observed the suspect on the rear passenger side of the vehicle point a black handgun out of the window and fire the gun to the north, not at him. PO continued to pursue the vehicle when he observed the rear passenger, a black male, lean out of the vehicle and point a black handgun at them and began shooting in his direction. He continued to pursue the vehicle at SB I-435 Hwy/23rd St when he observed the rear passenger lean out of the vehicle and began shooting at them, firing 10 to 12 shots. The pursuit ended at EB 40 Hwy/Donnelly Ave, and he observed several people flee from the vehicle and run into a tree line. PO Stewart stated he was in fear of his life when the suspect was shooting at him, and would like to prosecute.

TUCKER's clothing was recovered for evidence, and a ferrotrace test was conducted on his hands, which was positive. This test is for any iron particles on the hands consistent with firing a metal gun but is a preliminary test and cannot be considered conclusive. Gunshot residue tests were not conducted due to all parties within the vehicle being close in proximity to repeated gunfire.

TUCKER was transported to Headquarters after being released from the hospital, and detectives contacted him there and read him his Miranda rights. TUCKER stated he understood his rights and immediately requested an attorney.

CABALLERO-OCHOA, the driver, was interviewed, and stated the following: He was contacted by his friend, "KC Tucker," who asked him to come pick him up and drive him home. When he arrived TUCKER, two other black males, and a white male entered his vehicle. TUCKER was sitting in the front passenger seat. The white male was sitting in the rear seat in the middle with the other black males on either side of him. He has known TUCKER for approximately a year and is friends with him. He does not know who the other three males are but knows the back passenger on the right side was either named "" or """. When they left the residence he noticed police were in the area already and started following him. The police tried to pull them over and he wanted to stop. All of the passengers told him to run because they were armed with guns, so he decided to flee. While he was driving he heard shots coming from behind him. He believed both passengers near the windows in the rear were shooting at the police, but does not know if the white male in the rear shot. The two black males in the rear of the vehicle shot at the police multiple times during the pursuit. Once they reached the area of 23rd

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and Manchester Avenue he hit a curb and punctured a tire. He wanted to stop but the passengers told him to keep going. Once they got onto 435 south from 23rd Street he observed TUCKER lean out of the front passenger window and fire 5 to 10 shots at the police. TUCKER was leaning out of the window and turned back towards the police while he was firing his handgun, a silver or grey handgun of unknown caliber. Once the vehicle stopped at the end of the pursuit all of the passengers left the vehicle and ran. He observed police approaching and he knew he had a 9mm black handgun in his middle console, and threw it from the vehicle before the police arrived. CABALLERO-OCHOA was shown a photographic lineup containing a photo of TUCKER, and immediately made a positive identification of TUCKER. CABALLERO-OCHOA's statement is consistent with the black unknown make 9mm handgun found in the grass by the K-9 unit near the end point of the pursuit.

The juvenile suspect, was interviewed with his mother and a DJO present, and stated the following:
Yesterday, he was hanging out at a duplex on Franklin St in Independence, Missouri where he was staying for a
few days. He denied any involvement with breaking into a truck. He got picked up along with several other
males (his friend , a shorter black male with dreads, and a taller black male with face tattoos
known as J-Dot), by a "Mexican" male with a beanie in a black SUV. The black male with dreads was in the
front passenger seat, J-Dot was in the right rear seat, was in the middle rear seat, and
was in the left rear seat. They were going to the area of "16th and Truman," which clarified was near the
Quiktrip. Shortly after getting on Truman, they saw the police behind them and the driver started to pull over.
Dot told the driver to run since he had guns and "Percs", and immediately passed guns to the black male with
dreads and received a Smith and Wesson M&P and the black male with dreads received a silver
and black Taurus 9mm, and J-Dot had a black Glock 43. J-Dot started shooting at police, and yelled, "shoot,
nigga, shoot!" stated "I did what I did," which he clarified to mean he shot too.
during the first portion of the chase and emptied his clip fired approximately 3-4 shots shortly after they
got on the highway, after popping their tire, and later advised he did not know how many shots he fired and
believed the gun did not have a full clip. The black male with the dreads shot the whole clip from the silver and
black Taurus 9mm at the end of the chase. When their car stopped, jumped out and ran, tripped, lost his
shoes, and went under a vehicle to hide before being taken into custody.
.380 found in his waistband upon arrest was the same one he had used.
fired. stated he was shooting out of the left side rear window, and shot behind him not necessarily directly
at police. He demonstrated a physical position of leaning far to the side and pointing a gun back behind him.
denied knowing the Smith and Wesson M&P was stolen. He described J-Dot as a black male in his 20s
approximately 6 feet tall, muscular, with face tattoos, wearing a black hoodie. He had met him approximately a
month and a half ago and had seen him every 2-3 weeks since then. He did not know the name of the black male
with dreads, but described him as shorter, in his 20s, wearing a white hoodie. He stated J-Dot had shown him
approximately 100 "Percs" in his possession. stated his friend was a former neighbor,
who currently lives in Grandview. was a white male, about to turn 20. Facebook account's
profile picture included J-Dot. positively identified James GANT B/M 10-07-97 as "J-Dot," from a
photographic lineup, and positively identified Kammron TUCKER as the black male with dreads from another
photographic lineup. Both lineups were presented in a double blind fashion in accordance with current
department policy. It should be noted that on a break in the interview, used his mother's phone to video
call someone and stated that he "clapped at" the police while making a shooting motion, and that police had the
gunshot residue on his hands.

TUCKER's criminal history is as follows: On or about 08-15-2016, in Wyoming, Rawlins second district court, TUCKER was convicted of felony destruction/defacement of property, and sentenced to 3-5 years (#CR-2016-0039). He has several misdemeanor and city convictions through Missouri, and is currently on supervised release through Probation/Parole district 19 with an ankle monitor for unlawful possession of a firearm. TUCKER is currently in Clay County Detention on a detainer, and also has a Platte County warrant for failure to appear. Since TUCKER refuses to abide by the conditions of his supervised release to the extent of obtaining a firearm and shooting at police, I am requesting a warrant be issued for TUCKER and a high or no bond be associated with that warrant, in order to protect the community.

CABALLERO-OCHOA's criminal history includes the following: On or about 08-04-2022, in Jackson County Circuit Court, he was convicted of leaving the scene of an accident, a class D felony, and was sentenced to 3 years probation SIS. He also has a suspended license. Since CABALLERO-OCHOA was the driver of a vehicle on an extended vehicle pursuit, and he had full knowledge that his passengers were shooting at officers, I am requesting a warrant be issued for CABALLERO-OCHOA and a high or no bond be associated with that warrant, in order to protect the community.

James GANT's criminal history is as follows: On or about 05-22-19, in Johnson County KS district court, GANT was convicted of theft by deception, a felony, and sentenced to prison for 12 months (#19CR00207). On or about 01-15-21, in Johnson County KS district court, he was convicted of aggravated escape from custody, a felony, and sentenced to a \$194.50 fine (#20CR02449). On or about 08-04-21, in Jackson County Circuit Court, he was convicted of 2nd degree robbery and sentenced to 7 years confinement suspended, and 5 years probation, which was suspended on 02-22-22 (#1816CR0095701). GANT currently has a warrant for probation violation through Jackson County as well as a Johnson County, Kansas warrant for possession of methamphetamine. Since GANT is a felon with an extensive criminal history and current warrants including a probation violation, and since he initiated firing at police, I am requesting a warrant be issued for GANT and a high or no bond be associated with that warrant, in order to protect the community.

Printed Name	Det. Lauren Montgon	mery Gist #5654	Signature /s/ Det.	Lauren Montgomery Gist #5654
The Court finds	probable cause and di	rects the issuance	of a warrant this	day of
		Judge	e	-
	Circuit Court of		County, Stat	te of Missouri.