IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

POLICE NO.:	KC23009966
PROSECUTOR NO.:	095473469
OCN:	HU011207
STATE OF MISSOURI,)
PLAI	NTIFF,)
vs.)
JERRON ALLEN LIGHTFOOT)
2719 E HICKORY CT) CASE NO. 2316-CR
TONGANOXIE, KS 66086) DIVISION
DOB: 02/18/2004)
Race/Sex: W/M)
)
DEFEN	DANT.)
COMP	LAINT

COMPLAINT WARRANT REQUESTED

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y20200909.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the Class C Felony of Involuntary Manslaughter in the First Degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 15, 2023, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of James M. Muhlbauer by operating a motor vehicle at an excessive rate of speed and failing to abide by a traffic control signal, causing his vehicle to strike a motor vehicle in which James M. Muhlbauer was an occupant.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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 II. Involuntary Manslaughter 1st Degree (565.024-001Y20200909.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the Class C Felony of Involuntary Manslaughter in the First Degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about

State vs. JERRON ALLEN LIGHTFOOT

February 15, 2023, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of J. E. by operating a motor vehicle at an excessive rate of speed and failing to abide by a traffic control signal, thereby striking another motor vehicle which then struck J. E.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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/ Lauren Whiston
Lauren Whiston (#66185)
Assistant Prosecuting Attorney
415 E. 12th St., 11th Fl
Kansas City, MO 64106
(816) 881-4312
lwhiston2@jacksongov.org

WITNESSES:

- 1. DET Gary L. Burgess, 1125 Locust, Kansas City, MO 64106
- 2. DET Anthony L. Contreras, 1125 Locust, Kansas City, MO 64106
- 3. PO Douglas D. Davidson, 1125 Locust, Kansas City, MO 64106
- 4. CST Meagan Ingram, 2645 Brooklyn Ave., Kansas City, MO 64127
- 5. PO Karl T. Janning, 1125 Locust, Kansas City, MO 64106
- 6. PO Zackery Jenkins, 1125 Locust, Kansas City, MO 64106
- 7. Kelley Jones, 1224 Old Manor Road, Liberty, MO 64068
- 8. CST Ann M. Mallot, 2645 Brooklyn, Kansas City, MO 64127
- 9. CST Pamela Owens, 1125 Locust, Kansas City, MO 64106
- 10. DET Lawrence R. Pollard, 1125 Locust, Kansas City, MO 64106
- 11. DET Daniel A. Porter, 1125 Locust, Kansas City, MO 64106
- 12. DET Kevin D. Richardson, 1125 Locust, Kansas City, MO 64106
- 13. PO Lucas H. Tarwater, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

CRN: 23-000066

Date. 02 10 2028		25 00000			
I, Det. K. Rick			ving information as probable cause.)		
knowing that fa	alse statements	on this forn	n are punishable by law, stat	e that the facts contained herein are true).
I have probabl	le cause to beli	eve that on_	02-15-2023 , at E. Truma	n Road and Benton Boulevard	in
			(Date)	(Address)	
Kansas City,	Jackson	Missouri,	Jerron Allen Lightfoot	W/M 02-18-2004	
	(County)		(Name of Offender(s)	(Description of Identity)	
committed one	or more crimi	nal offense(s	s).		
Fatality Crash					

The facts supporting this belief are as follows:

Date: 02-16-2023

On 02-15-2023, Kansas City Missouri Police Officers, responded to the area of E. Truman Road and Benton Boulevard, Kansas City, Jackson County, Missouri in regard to an injury crash. Upon arrival, Officers observed a two-vehicle collision. Officer Z. Jenkins observed a white male standing next to one of the crashed vehicles, white Ford Fusion. The white male was later identified as JERRON ALLEN LIGHTFOOT W/M 02-18-2004, and as the driver and sole occupant of the white Ford Fusion. Officer Z. Jenkins asked LIGHTFOOT if he was okay and he responded, "Yes, I'm okay, my brakes went out." The other crashed vehicle was a marked police vehicle which was a blue Ford Crown Victoria. The police officer was still seated in the driver's seat of the police vehicle, unconscious with pulse. The police officer was found wearing his seatbelt, shoulder and lap belt. His partner, police K-9 Champ was found deceased in the back second row compartment of the police vehicle. The police officer was transported to an area hospital where he was later pronounced deceased. Officer Z. Jenkins then located a second deceased male, identified as J.E (w/m), that was pinned underneath the police vehicle.

While at the crash scene, detectives contacted a witness, identified as K. Jones. Ms. Jones stated she was traveling westbound on E. Truman Road at Benton Boulevard, when she observed a white Ford fail to stop at a red light and strike a police vehicle that had been traveling eastbound on E. Truman Road. Ms. Jones stated the impact caused the rear of the white Ford to go airborne. Ms. Jones stated the white Ford was traveling over the posted 35 MPH speed limit on Benton Boulevard and was traveling to fast for conditions. Ms. Jones stated at the time of the crash she only observed the two vehicles involved in the crash at the intersection on the roadway. Ms. Jones stated she called 911 and stopped at the crash scene to check for injuries. She stated she observed the driver of the white Ford exit the vehicle and he appeared not to be injured. Upon the direction of the 911 call takers she entered the police vehicle on the passenger side and checked the police officer for a pulse. The witness observed the police officer unconscious and to have a pulse and still seated in the driver's seat. Ms. Jones remained at the crash scene until police arrived.

Detectives conducted an area canvass for video at the crash scene. Detectives recovered video from two separate businesses near the crash scene. One business on the northwest side of the intersection had video of the crash. A review of the video showed the police officer was traveling eastbound on E. Truman Road at Benton Boulevard and had a green traffic signal at the intersection. Further, the video showed the white Ford was traveling southbound on Benton Boulevard at a high rate of speed and had a red traffic signal. The video showed the white Ford failed to stop at a red traffic signal just prior to striking the police vehicle.

Detectives also reviewed the police vehicle's mounted dash camera and body camera videos. A review of the police vehicle video clearly shows the green traffic signal for eastbound E. Truman Road at Benton Boulevard as the police vehicle approaches the intersection. The dash camera video displayed a speed of 33 MPH for the police vehicle just prior to impact.

PROBABLE CAUSE STATEMENT FORM

CRN	23-009966	
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Detective Rives reviewed city camera videos near the crash scene. The city camera videos showed the white Ford's brakes functioning as designed as it slowed and made a southbound turn onto Benton Boulevard from Independence Avenue just prior to the crash.

Under the authority of a search warrant, the white Ford Fusion was processed. The imaged data on the ACM on the white Ford revealed the following: At 5 seconds prior to impact the vehicle was traveling 84.9 MPH, 0% accelerator and brake switch off, at 4.5 seconds prior to impact the vehicle was traveling 85.4 MPH with 99.9 % accelerator and brake switch off, at 4 seconds prior to impact the vehicle was traveling 86.1 MPH with 99.9 accelerator and brake switch off, at 3.5 seconds prior to impact the vehicle was traveling 87.7 MPH and 99.9 accelerator and brake switch off, at 3 seconds prior to impact the vehicle was traveling 87.7 MPH and 99.9 accelerator and brake switch off, at 2.5 seconds to impact the vehicle was traveling 88.6 MPH and 99.9 accelerator and brake switch off, at 2 seconds prior to impact the vehicle was traveling 82.7 MPH and 25.9 accelerator and brake switch off, at 1.5 seconds prior to impact the vehicle was traveling 82.7 MPH and 0% accelerator and brake switch on, at 1 second prior to impact the vehicle was traveling 78.1 MPH and 0% accelerator and brake switch on and at impact the vehicle was traveling 62.3 MPH and 0% accelerator and brake switch on and at impact the vehicle was traveling 62.3 MPH and 0% accelerator and brake switch on A review the crash data from the ACM showed the vehicle's brakes were functioning as designed due to the driver being able to scrub off 27.4 MPH in 2 seconds. The vehicles ABS was engaged at 1.5 seconds prior to impact.

Detectives interviewed LIGHTFOOT. LIGHTFOOT was advised of his rights, per Miranda, and he agreed to give a statement. LIGHTFOOT stated he had just dropped off his girlfriend at a nearby gas station and he was heading back to his residence in Tonganoxie Kansas. LIGHTFOOT stated as he approached the intersection he had a red traffic signal. LIGHTFOOT stated he attempted to apply his vehicle's brakes and he was unable to slow his vehicle down by pressing the brake pedal. LIGHTFOOT stated he traveled down the hill towards the intersection where the crash occurred and he estimated his vehicle speed of 50-55 MPH at the time of impact. LIGHTFOOT stated he felt a lot of vibration when he attempted to apply the brakes. LIGHTFOOT denied drug or alcohol use prior to the crash. LIGHTFOOT stated he was the sole occupant of the white Ford at the time of the crash.

Under the authority of a search warrant a buccal swab was recovered from LIGHTFOOT.

A computer check of LIGHTFOOT revealed him to respond valid through Kansas DOR.

Printed Name	Det. K. Richard	son #4290	Signature Des	filler	7200
The Court find	s probable cause a	and directs the issuance		day of	<u> </u>
				_	
		Judg	ge		
	Circuit Court	of	County, S	tate of Missouri.	