IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT INDEPENDENCE

POI	LICE NO.:	23-0189	50
PROSECU	TOR NO.:	0954739	907
	OCN:		
STATE OF MISSOURI,	PLAIN	TIFF,))
VS.		`	
MELVIN T BROWN 1409 South Spring Street Independence, MO 64055 DOB: 08/17/1996))) CASE NO. 2316-CR) DIVISION
Race/Sex: W/M)
	DEFENI	DANT.	<i>,</i>)

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 on or about March 22, 2023, in the County of Jackson, State of Missouri, Jake J. Monteer was killed by being struck by a motor vehicle while riding a motorcycle 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 March 22, 2023, 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. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-003Y20200999.0)

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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 on or about March 22, 2023, in the County of Jackson, State of Missouri, Jessica M Fields was killed by being struck by a motor vehicle while riding a motorcycle 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 March 22, 2023, 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 III. 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 an arrest**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about March 22, 2023, in the County of Jackson, State of Missouri, Officers Gena, Stauch and Romey, law enforcement officers, were making an arrest of defendant for Tampering with a Motor Vehile, and the defendant knew or reasonably should have known that the officers were making an arrest, and, for the purpose of preventing the officers from effecting the arrest, resisted the arrest of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant drove at high rates of speed and ignored traffic control devices.

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 IV. Leaving Scene Of Accident - Accident Resulting In Death (577.060-006Y20205401.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.060, RSMo,

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committed the class D felony of leaving the scene of an accident, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 22, 2023, the defendant, while operating a motor vehicle on a highway generally open for use by the public located at or near Scott Avenue and Winner Road, in the County of Jackson, State of Missouri, was involved in an accident that resulted in the death of Jake J. Monteer and Jessica Fields, and the defendant knew that such accident had occurred, and the defendant left the place of the accident without stopping and giving defendant's name, residential address, and operator's license number to such persons or to a police officer in the vicinity or to the nearest police station or judicial officer.

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 V. 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 558.011 and 558.002, RSMo, in that on or about March 22, 2023, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a white Jeep Grand Cherokee, an automobile.

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.

JEAN PETERS BAKER

Prosecuting Attorney Jackson County, Missouri by,

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/s/ Traci A. Stansell

Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
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WITNESSES:

- 1. PO Ron Baltzer, 223 N. Memorial Drive, Independence, MO 64050
- 2. SGT Scott Durst, 223 N. Memorial Drive, Independence, MO 64050
- 3. Jessica M Fields, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 4. PO Brian Flavin, 223 N. Memorial Drive, Independence, MO 64050
- 5. PO Joshua Gena, 223 N. Memorial Drive, Independence, MO 64050
- 6. Jake J. Monteer, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 7. PO Robert Romey, 223 N. Memorial Drive, Independence, MO 64050
- 8. PO Brett Schmidli, 223 N. Memorial Drive, Independence, MO 64050
- 9. PO Jeremie Stauch, 223 N. Memorial Drive, Independence, MO 64050
- 10. PO Chad Stetzler, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 3/23/2023 Report: 2023-18950 OCN:

- I, <u>Detective Ron Baltzer</u>, knowing that false statements on this form are punishable by law, state that the facts contained herein are true:
- I have probable cause to believe that on 3/22/2022 at 2240 hours, Francis and McCoy, Melvin Tyler Brown, W/M. 08/17/1996, 1409 S Spring St, Independence, MO, 64055, Independence, Jackson County, Missouri.
- 2. The facts supporting this belief are as follows:

On 03-22-2023 at approximately 2240 hours, Detective Gena conducted a traffic stop at Francis and McCoy Street.

Prior to the traffic stop, Detective Gena drove by 1409 S. Spring and observed a white Jeep bearing Missouri registration ZG3L4U, which was showing as a stolen vehicle.

Detective Gena conducted surveillance from a safe distance from the residence and observed an unknown subject walk towards the Jeep from the residence. Detective Gena observed the lights activate on the Jeep. Detective Gena observed the Jeep reverse out of the driveway and travel north on Spring Street then west on Southside Blvd. Detective Gena advised dispatch and other units that he was following an occupied stolen vehicle and requested officers to set up stop sticks in the area to prevent a prolonged pursuit.

Detective Gena followed the vehicle south on McCoy Street from Francis and coordinated stop sticks with officers at 35th and Crysler Avenue. Detective Gena continued to follow the vehicle from a safe distance (emergency lights and siren were not activated). The vehicle turned west on 31st Street and then south on Crysler Avenue. The vehicle approached 35th and Crysler Avenue and observed two Independence Police vehicle's and made a U-Turn prior to the intersection to avoid stop sticks.

Detective Gena activated the emergency lights and siren and advised dispatch that he was in pursuit of an occupied stolen vehicle. The pursuit path took the following course:

- North on Crysler Avenue from 35th Street with approximate speeds of 61 mph while traveling north, the vehicle made a wide U-Turn and then traveled back south on Crysler Avenue.
- South on Crysler Avenue from 30th Street with approximate speeds of 50 mph.

- •East on 31st Street from Crysler Avenue with maximum speeds of 66 mph.
- North on Sante Fe from 31st Street with maximum speeds of 71 mph.
- •East on Gudgell Avenue from Sante Fe with maximum speeds of 45 mph.
- North on Spring Street from Gudgell Avenue with maximum speeds of 59 mph.
- East on Southside Blvd from Spring Street with approximate speeds of 55 mph.
- North on Liberty Street from Southside Blvd with maximum speeds of 45 mph.
- •East on 23rd Street from Liberty Street (vehicle went into oncoming traffic, swerved towards Captain S. Durst (victim), and continued east in the westbound lanes) of 23rd St. The vehicle slowed down and traveled 34 mph through Noland Road and drove past three vehicles that were stationary. The Aggravated Assault on LEO report was handled by PO Gena under Report # 2023-19145.
- •The vehicle drove east in the west bound lanes for approximately five blocks passing the three stationary vehicles mentioned above. Detective Gena continued to pursue the vehicle due to the suspect almost striking another officer with the vehicle.
- North on Hocker Avenue from 23rd Street with maximum speeds of 45 mph.
- •West on South Avenue with maximum speeds of 55 mph.
- •North on Main Street from South Avenue with maximum speeds of 67 mph.
- West on Short Avenue from Main Street with approximate speeds of 28 mph.
- •North on Liberty Street from Short Avenue with approximate speeds of 35 mph.
- •West on Walnut Street from Liberty Street with approximate speeds of 70 mph.
- South on Claremont Avenue from Walnut Street (which turned into 15th Street) approximate speeds of 52 mph.
- Vehicle went east, off-road by the railroad tracks.

At the time, Detective Gena exited his patrol vehicle and attempted to pursue the suspect on foot, due to the appearance of the vehicle being disabled from the mud and brush. The vehicle continued and went north on Vermont Avenue. Detective Gena lost sight of the vehicle.

Sgt Romey located the suspect vehicle and his pursuit took the following path:

- EB 15th to Forest Speeds 50 MPH
- NB Forest to WB Truman Rd 63 MPH
- WB Truman Rd to SB Crisp 93 MPH
- SB Crisp to EB 13th St
- Eb 13th to SB Scott 52 MPH

At this time Sgt Romey lost sight of the vehicle.

The vehicle was observed by PO Stauch at 15th St and Scott Ave and the vehicle continued south on Scott. Just as PO Stauch passed the railroad tracks on Scott Avenue, He noticed the Jeep was slowing down at the intersection and then

swerved. PO Stauch was advised by Officer Simpson that he had a successful stop stick deployment which struck the rear driver side tire of the Jeep.

After the stop stick deployment, the Jeep appeared to have lost control traveling off the roadway to the left and then it re-gained control and continued on south Scott Avenue. As PO Stauch got closer to the intersection and he slowed down, he observed what he thought was debris that had fallen out of the vehicle while it was losing control. Once PO Stauch got even closer, he noticed two bodies lying on the street. The incident happened so fast PO Stauch originally thought the people were thrown out of the vehicle. Later while in pursuit of the suspect, Sgt. Gilbertson advised that the Jeep actually struck a Motorcycle and the two occupants appeared to be deceased.

The crash occurred at Scott Ave and Winner Rd. The stolen Jeep was southbound on Scott Ave. The motorcycle was eastbound on Winner Rd. The male driver of the motorcycle was pronounced deceased at the scene by AMR. The male was later identified as Jake Jackson Monteer, W/M, 07/08/1981. The female passenger of the motorcycle was transported to Centerpoint Medical Center where she was pronounced deceased at 23:32 hours. The female was later identified as Jessica Marie Fields, W/F, 08/03/1980.

PO Stauch followed the vehicle southbound on Scott Ave to 20th St where he temporary lost sight of the vehicle but picked the vehicle back up eastbound on 23rd St near Crysler. PO Stauch followed the white Jeep on the following streets:

SB, Pleasant, No traffic

EB. South Side, No traffic

SB, Osage, No traffic

WB, Francis through a driveway/yard

SB, Spring, No traffic

EB, Gudgell, No traffic

SB, Osage, No traffic

SB, Noland, medium traffic yielding

Sgt. Stetzler became primary in the pursuit and requested to disable the Jeep due to the severity of the crash and the driver continuing to operate in a dangerous manor. Captain Durst gave Sgt. Stetzler permission. PO Stauch then became secondary in the pursuit until the suspect went eastbound in the westbound lanes of I-70 from Noland Rd. Sgt. Stetzler and PO Stauch turned around and followed the Jeep eastbound on I-70 in the correct lanes of travel. The Jeep later did a U-turn just pass Lee's Summit Rd and began driving westbound on I-70.

Sgt. Stetzler was able to catch back up with the Jeep in the area of Lee's Summit and I-70. The suspect attempted to flee westbound on I-70 in the eastbound lanes. Sgt Stezler attempted to disable the vehicle a second time on the exit

ramp of I-70, which resulted in the suspect turning back eastbound, then southbound on Lee's Summit Rd. Sgt. Stezler was able to effectively disabled the vehicle on Lee's Summit Rd near 42nd St. The Jeep rolled but the driver was still continuing to flee so Sgt Stezler pushed the suspect vehicle into the side of IPD Patrol Unit 4462 causing several thousands of dollars in damage.

The suspect was later identified as Melvin Tyler Brown, W/M, 8/17/1996 and was transported to Centerpoint Hospital for minor injuries- broken arms.

During an inspection of the vehicle Officer's observed the ignition column of the Jeep was broken in numerous pieces. Two screw drivers were located on the driver's seat in the vehicle used to start the vehicle. The rear vent window on the driver's side was broken out and had been taped over to cover the area where the glass once was. Officer's on scene confirmed the vehicle was stolen via Dispatch. The vehicle was stolen on 03-17-2023 from 9900 NW Praire View Road, Kansas City, Missouri, with the owner being Alden Willdermood. SHP# 230317-082550. KCPD Report # 2023-16424.

DRE Brett Schmidli responded to Centerpoint Medical Center. He conducted a DWI investigation on Melvin Brown. PO Schmidli observed signs of impairment on Brown. Missouri Implied Consent was read on 3/23/2023 at 0033 hours. Brown refused to provide a blood sample. PO Schmidli obtained a search warrant due to the fatality crash. A blood sample was drawn at Centerpoint Medical Center by RN Samuel Clark at 0304 hours. The blood sample was placed into property. The blood sample was taken to Children's Mercy Lab. A preliminary result showed the presence of Amphetamine, Methamphetamine and Cannabinoids. A confirmation test is pending.

During PO Schmidli's DWI investigation, PO King picked up Melvin Brown's pants and conducted a further search of them. Inside one of the pockets, PO King located a baggie containing three blue pills labeled "M30" which PO Schmidli advised is a narcotic, possibly Fentanyl, and a clear plastic baggie of a crystal substance. The baggie of the crystal substance field tested positive for the presence of methamphetamine and had a weight of .081 grams. The drugs were placed into property.

Ron Baltzer

Print Name Detective Ron Baltzer Independence MO Police /s/ Ron Baltzer

Signature