

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

POLICE NO. :	23-003285
PROSECUTOR NO. :	095474469
OCN:	PQ007280

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
COOPER D ASHLEY)	
12906 Gammon Rd.)	CASE NO. 2316-CR
Lees Summit, MO 64086)	DIVISION
DOB: 02/20/2005)	
Race/Sex: W/M)	
)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y20200999.0)

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 May 13, 2023, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Dakota Wrightsman by shooting him.

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.

State vs. Cooper D Ashley

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
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STATEMENT OF PROBABLE CAUSE

Date: 5/30/23

Lee's Summit P.D. Case Number: LSPD23-03285 Murder

I, Detective 1001 - Stewart, Phillip Jr, an investigator with the Lee's Summit, Missouri, Department of Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that on **May 13th, 2023**, in the area of **Lee's Summit, Jackson County Missouri**, the suspect, **ASHLEY, COOPER D (Race: White, Sex: Male, DOB: , and [REDACTED]** committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 5-13-2023 at about 0122hrs Lee's Summit Police Officers responded to a residence located in Lee's Summit, Jackson County Missouri regarding a gunshot victim, hereon identified as Victim #1. On officer's arrival Victim #1 was located near the top of the stairs on the second story, bleeding from his head and neck area. Life saving measures were attempted that were unsuccessful and Victim #1 succumbed to his injuries.

Located at the scene on the lower level floor was a Glock 36, a .45 caliber semi-automatic handgun. Also observed was a large amount of blood extending from Victim #1, down the stairs into the basement.

At the residence was Victim #1's father, hereon referred to as Witness #1. He explained he was outside the residence when he heard a single gunshot. When he entered the house, he saw Victim #1 leaving the basement area and run to the top of the stairs to Victim #1's mother, hereon referred to as Witness #2. Witness #1 said Victim #1 had been in the basement with Cooper ASHLEY, Witness #3 and Witness #4.

DET Michael REESE and DET James TREACY later conducted an interview with ASHLEY. ASHLEY stated he was in the basement with Victim #1, Witness #3 and Witness #4 when he observed a handgun on the floor behind where Victim #1 was seated in a bean bag chair. ASHLEY said he picked up the handgun and had his finger on the trigger and a single shot was fired. ASHLEY stated Victim #1 was looking at him at the time the shot was fired. After the shot was fired Victim #1 ran from the basement. A presumptive gunshot residue test was conducted on ASHLEY's hands which showed positive for gunshot residue. Further, during the interview ASHLEY revealed he had consumed Marijuana a short time prior.

I, along with DET Steve OWINGS, later conducted an interview with Witness #3. Witness #3 stated the firearm used by ASHLEY belonged to him (Witness #3). Witness #3 stated he was carrying the firearm in the pocket of his hooded sweatshirt. While in the basement he engaged in a playful wrestling over a bean bag chair with Witness #4 during which he believes the firearm came out of his pocket. Witness #3 soon heard a shot and when he turned he saw ASHLEY holding the firearm pointed at a downward angle (toward Victim #1).

Two interviews were conducted with Witness #4 on 5-13-2023 and 5-24-2023. Witness #4 stated on 5-13-2023 he was at Victim #1's house with Witness #3 and ASHLEY. He and Witness #3 were wrestling when he heard a shot. He went on to describe after the shot he looked to ASHLEY who was standing behind Victim #1, with the gun in his hand with an outstretched arm, with the gun pointed at Victim #1's head. Witness #4 would later stand and demonstrate how he observed ASHLEY standing with the gun with SGT Matt MILLER standing in as Victim #1. Witness #4 stood behind SGT MILLER and slightly to SGT MILLER's left. Witness #4's hand was almost

fully extended, pointed downward at what appeared to be a 50 to 60 degree angle, just left of center of SGT MILLER's head. Witness #4 also stated when he first turned to look after the shot the firearm was smoking. Next Witness #4 said Victim #1 ran from the basement and heard ASHLEY say "What did I do?" and "I thought it was my airsoft gun." Witness #4 was certain ASHLEY stated "my airsoft gun" It should be noted that at no time during the interview with ASHLEY did he state he thought he fired an airsoft firearm. Witness #4 said immediately following the shot, ASHLEY commented of leaving the residence and in response both he and Witness #3 both stated no, because he (ASHLEY) had just shot someone. Next ASHLEY asked about creating a "story". ASHLEY offered an excuse of he dropped the gun or the gun fell and it went off. Witness #4 also stated he partook in smoking Marijuana with the others that included ASHLEY. Witness #4 added ASHLEY had consumed "a good quantity of alcohol" as well.

On 5-17-2023 a second interview was conducted with Witness #1. Prior to the interview a video of the activities in the home were watched for the night of 5-13-2023. In the video Witness #1 is seen, but not heard, having a conversation with ASHLEY, Witness #3 and Witness #4. Witness #1 was asked about this conversation. Witness #1 said he again asked him what happened. ASHLEY tells him "We had the gun. It was on the floor and I went to move it away so this wouldn't happen and it just went off." Witness #1 did not offered an explanation as to how the firearm came to be on the floor. He asked the three why they had a gun and no one gave an answer, only shrugs. Witness #1 believes that at the time ASHLEY knew the firearm was in fact a firearm.

Other interviews had been conducted with those associated with ASHLEY. One such interview was with Witness #5. Witness #5 has known ASHLEY his entire life. In that interview Witness #5 stated he has taught ASHLEY how to shoot firearms. On 5-17-2023 an interview was conducted with Witness #6. Witness #6 is friends with Witness #4, Witness #3, ASHLEY and Victim #1 and all had been together at Witness #6's residence for a short time before going to Victim #1's residence. Witness #6 also told me he has seen ASHLEY in possession of a firearm in the past stating that it belonged to Witness #5. I asked Witness #6 if he has ever seen ASHLEY with an airsoft gun, he stated yes that ASHLEY would often carry it to look "cool". Witness #6 also described times where ASHLEY would horseplay with the airsoft by pointing at himself and/or point it at others (to include Witness #6) while pulling the trigger. Also interviewed was Witness #7, another friend who was also present at Witness #6' residence. Witness #7 told us he knew ASHLEY to possess a Glock replica pellet gun. Witness #7 said ASHLEY would carry this in his waistband in a manner it could be seen. He also stated he has known ASHLEY to point it at others and pull the trigger. During the second interview with Witness #4 he also talked ASHLEY's reckless play with an airsoft. Witness #4 had also described occasions in which ASHLEY would point the airsoft at him and others and pull the trigger.

A check of ASHLEY's criminal history showed no prior arrest or convictions.



06/06/23

Signature of Detective 1001 - Stewart, Phillip Jr

Date