

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC22071389
PROSECUTOR NO. :	095474023
OCN:	HS036666

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
RYAN R. JACKSON)	
1216 Brush Creek Blvd., #C)	CASE NO. 2316-CR
Kansas City, MO 64130)	DIVISION
DOB: 08/23/1992)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Property Damage 1st Degree (569.100-001Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the class E felony of property damage in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about October 21, 2022, in the County of Jackson, State of Missouri, the defendant knowingly damaged a house located in Jackson County, which property was possessed by Edward Dancy by ripping cabinets off the kitchen wall and smashing several doors and windows, and the damages to such property exceeded seven hundred and fifty dollars.

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.

State vs. Ryan R. Jackson

Count II. Animal Abuse - 2nd/Subsequent Offense Or By Torture And/Or Mutilation While Animal Was Alive (578.012-002Y20205599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 578.012, RSMo, committed the class E felony of animal abuse, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about October 21, 2022, in the County of Jackson, State of Missouri, the defendant purposefully or intentionally caused an animal, a gray and white bulldog named Rom, to suffer by striking and breaking its legs, and the suffering caused was the result of torture consciously inflicted while the animal was alive.

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/ Claire E Wyatt
Claire E Wyatt (#74083)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3555
cewyatt@jacksongov.org

WITNESSES:

1. Edward Dancy, 415 E. 12th St, Kansas City, MO 64106
2. PO Juan Garcia, 1125 Locust, Kansas City, MO 64106
3. [REDACTED]

State vs. Ryan R. Jackson

4. [REDACTED]
[REDACTED]
6. PPO Jesse A. Jasso, 1125 Locust, Kansas City, MO 64106
7. DET Jeffrey D. O'Rear, 6801 NE Pleasant Valley Rd, Kansas City, MO 64119
8. PO David J. Owens, 1125 Locust, Kansas City, MO 64106
9. [REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 04/04/2023

CRN: 22071389

I, Detective Jeffrey D. O’Rear, Kansas City Missouri Police Department
(Name and identify law enforcement officer, or person having information as probable cause.)

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 10/21/2022, at 2950 Lockridge St. in
(Date) (Address)

Kansas City, Jackson Missouri Ryan Jackson
(County) (Name of Offender(s))

B/M, 08/23/1992 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 10/21/2022, at 0216 hours, Kansas City, Missouri Police Officers were dispatched to 2950 Lockridge St., Kansas City, Jackson County, Missouri on a reported disturbance.

Prior to the officer’s arrival they made telephone contact with the calling party who was identified as [REDACTED]. The officers were advised by [REDACTED] that he was not at the residence, but had just received a telephone call from his roommate who was at the residence. [REDACTED] identified the roommate as Ryan Jackson. He stated Ryan Jackson called him on the telephone and told him that he had just “fucked up the house, and fucked up his dog.” [REDACTED] informed the responding officers that he would be standing by at the location waiting for their arrival.

Upon arrival the officers made contact with the male outside the dispatched residence who was identified as, Ryan Jackson B/M, 08/23/1992. The responding officers also immediately observed a white and grey bulldog in the roadway. The dog had numerous injuries about it body which consisted of bleeding from the mouth and face. The officers observed a visible injury which was described as blood coming from one of the dog’s paws. It was determined by the officers the dog had no mobility in its hind legs, and was unable to move.

The responding officers then made contact with [REDACTED] it was advised by [REDACTED] that Ryan Jackson had gotten into a verbal argument with him earlier in the day over missing money.

The officers conducted a check of the interior of the dispatched residence. The residence was heavily damaged. Numerous windows and doors were destroyed on multiple levels of the residence. The officers further observed the kitchen cabinets to be ripped of the wall, and television screens to be smashed and destroyed. The preliminary estimate of the damage at this point was approximately \$20,000.

The officers contacted Ryan Jackson who informed then that he did not know who would have caused the damage, and he knew nothing about the visible damage. The officer noted that he did observe what appeared to be fresh blood on the lower leg of Ryan Jackson’s pants. A computer check was conducted of Ryan Jackson was conducted which revealed him to have a outstand warrant for property damage out of the Kansas City, Missouri Police Department.

Kansas City Pet Project responded to the scene and transported the injured dog to Blue Pearl Emergency Animal Hospital for treatment.

PROBABLE CAUSE STATEMENT FORM

CRN 22071389

Ryan Jackson was placed under arrest and subsequently transported to East Patrol Detention for his outstanding arrested warrant. As the injuries and damage amount escalated during the course of this investigation Ryan Jackson was placed on an investigative hold for felony property damage, and animal cruelty.

Shortly after Ryan Jackson's arrest the condition of the dog was followed up while at the Blue Pearl Emergency Animal Hospital. The dog was first examination showed two broken hind legs, cuts and scratches on the surface of his face and mouth, along with a ripped out toenail.

I subsequently made telephone contact with the calling party who was earlier identified as, [REDACTED]. He confirmed all of the above listed statement he had made to the responding police officers were correct and accurate. He confirmed he notify the 911 dispatcher due to the fact he received a telephone call from his roommate Ryan Jackson who alerted him that he had just damaged the house and injured his dog. [REDACTED] confirmed that Ryan Jackson took responsibility for these damages/injuries during the telephone call made to him. [REDACTED] indicated that this incident originally began over Ryan Jackson being upset over the fact that he believed someone had stolen money from him in the recent past. This telephone interview with [REDACTED] and I did further reveal that [REDACTED] was not the actual owner of the now injured dog, but he was simply dog sitting for a friend.

On 10/21/2022, at approximately 1819 hours, I responded to East Patrol Detention Unit, located at, 2640 Prospect Ave., Kansas City, Missouri. This response was for the purpose of interviewing Ryan Jackson B/M, 08/23/1992 regarding his recent arrest involving felony property damage and animal cruelty. Jackson was advised of his Miranda Rights and agreed to provide a statement surrounding his arrest.

During the course of the interview Jackson did not take responsibly for damaging the residence of injury the dog. It should be noted Jackson advised he never called the calling party to alert him of any damages to the house or injuries to the dog. Jackson asked question on how one could be charged for damaging property that belong to themselves, or at a place where they resided. The questions were made by Jackson as he continued to deny any involvement.

On 10/23/2022, it was discovered the dog succumbed to his injuries it suffered on the day of the reported offense.

During the course of this ongoing investigation an area canvass was conducted at surrounding residences near the scene of the offense. A listed witness was contacted who lives near the suspect on 11/07/2022. It was determined during the interview with the witness that he confirmed the individual who was arrested by the responded officers was being belligerent prior to the arrival of the officers. The witness confirmed that he could hear the sounds of property being destroyed and the breakage of glass accompanied with the sound of the suspect voice yelling. It was also confirmed that the witness heard the suspect comment about the dog in question. The witness advised he couldn't completely make out what the suspect said, but "it was about him doing something to the dog, but could not tell what he said exactly."

Printed Name Jeffrey O'Keefe

Signature [Handwritten Signature]

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.