

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

Police# 15-005789
Prosecutor# 095428794
1516-CR
OCN# U7015958

**COMPLAINT
STATE REQUEST A WARRANT**

STATE OF MISSOURI

vs.

Ray Anthony Jordan
6112 E. 150th Street
Grandview, MO 64030
DOB: 12/24/1974; Race/Sex: B/M;
SS# 4 [REDACTED]
Defendant.

**Count I. Leaving Scene Of Motor Vehicle Accident - Injury, Property Damage Or 2nd
Offense (48865010)**

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, committed the **class D felony of leaving the scene of a motor vehicle accident**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about December 27, 2015, the defendant, while operating a motor vehicle on the East Outer Road, a highway generally open for use by the public at or near 12800 block of East Outer Road in the County of Jackson, State of Missouri, was a party to an accident that caused another person to sustain fatal injuries, and the defendant knew that such injury had occurred, and the defendant left the scene of the accident without stopping and giving sufficient information by which the defendant could be readily identified and located to such person or to a police officer in the vicinity or to the nearest police station or judicial officer.

Count II. Driving While Revoked/suspended - 1st Offense (46776060)

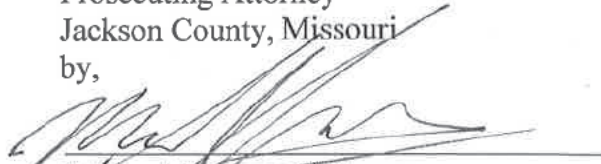
The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 302.321, RSMo, committed the **unclassified misdemeanor of driving while license was suspended**, punishable upon conviction under Sections 302.321, 558.011 and 560.016, RSMo, in that on or about December 27, 2015, in the county of Jackson, State of Missouri, the defendant operated a motor vehicle on a highway, 12800 block of East Outer Road, during a time when the defendant's operator's license was suspended under the laws of this state, and acted with criminal negligence with respect to knowledge of the fact he knew that the defendant's operator's license was suspended.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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,



Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
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WITNESSES:

PO Paul Brooks , 1200 Main Street, Grandview, MO 64030
PO Wesley Flores , 1200 Main Street, Grandview, MO 64030
DET Gabriel Gilbert , 1200 Main Street, Grandview, MO 64030
PO Jacob Gross , 1200 Main Street, Grandview, MO 64030
Christopher M Handley , 12801 S. 71 Hwy, Grandview, MO 64030
Scott A Morris , 7509 E 133rd Terr, Grandview, MO 64030
PO Travis Richardson , 1200 Main Street, Grandview, MO 64030
PO Megan Spears , , ,
PO Martin Studdard , 1200 Main Street, Grandview, MO 64030
PO Joseph Theis , 1200 Main Street, Grandview, MO 64030
Michael D. Williams , 5208 Hickory Road, Apt. 1, Kansas City, MO 64129

GRANDVIEW STATEMENT OF PROBABLE CAUSE**12-30-2015**

I, **Martin Studdard**, 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 **12-27-2015 approximately 0143hours at the 12800 block of East Outer Road (EOR) I-49, Grandview, Jackson County, Missouri, Jordan, Ray Anthony (b/m 12-24-1971)** () committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 12-27-2015 at approximately 0143hours, an SUV struck a pedestrian at the 12800 block of East Outer Road (EOR) I-49 in Grandview, Missouri. The SUV then left the scene. The pedestrian, identified as Morris, Scott Anthony (b/m 03-24-1977) was treated by EMS on scene, and transported to Research Medical Center, where he later died of his injuries sustained in the motor vehicle crash. Surveillance video from the Holiday Inn Express at 12801 S 71 Hwy captured the hit and run motor vehicle crash, showing a dark in color SUV traveling northbound on the East Outer Road. The video showed the vehicle striking Morris, slowing, and then leaving the scene.

On 12-30-2015 at approximately 0059 hours, Suspect Jordan, Ray Anthony (b/m 12-24-1974 SSN) turned himself in at Grandview Police Headquarters, 1200 Main St, Grandview, Missouri. During the interview, Jordan stated that he was operating a tan SUV, a 2009 Kia Borrego, MO 2016 YF1Z1L, VIN KNDJJ741595025134, and had driven to Grandview from Blue Springs, MO.

Jordan at first stated that he did not consume any alcohol prior to the crash, but later amended that statement to 2 beers consumed. He then further amended his statement, stating that he consumed 5 beers prior to the crash. Jordan stated that he lied about his alcohol consumption because he has a prior DWI conviction, and did not want another one.

Jordan stated that he was traveling northbound on EOR I-49 and that he thought he struck a deer with his vehicle while he was in front of the Holiday Inn Express. Jordan stated that he continued northbound, then turned right (eastbound) on to 127th St. Jordan stated that he stopped to inspect his vehicle damage, and looked back towards the area of impact. Jordan stated that he did not see anything on the roadway, including the reporting party who stopped his white SUV, backed up and responded to Mr. Morris, all within 10 seconds of the collision. Jordan stated that he then left the scene in his vehicle. Jordan stated that he left the scene because he has a suspended driver's license.

Jordan stated that the vehicle had been towed to Johnson's Auto Body, 9001 E Winner Rd, Independence, Missouri 64053. The vehicle was recovered by Grandview Police and towed to Grandview Police Headquarters by Lazer Tow. Grandview Officer Nicholas escorted the tow to Grandview Police Headquarters, where the vehicle was secured.

The investigating officer observed severe damage to the passenger side front end, including front bumper, grill, hood, front fender and windshield, consistent with a motor vehicle crash striking a pedestrian. A portion of headlight lens that was recovered at the scene of the crash matched the damage to the suspect vehicle's passenger side headlight. The investigating officer also observed that the passenger side view mirror was broken off and missing, and there was damage to the passenger side doors and rear fender area, consistent with a sideswipe collision that is indicative of impaired driving. The damaged windshield also contained pieces of hair consistent with human hair.

The submitting officer respectfully requests that Jordan be charged with Involuntary Manslaughter, as his reckless behavior, exhibited through his continued and willful operation of a motor vehicle despite knowledge of his suspended driving status, directly resulted in the death of Mr. Morris. Jordan's stated alcohol consumption also adds to his reckless behavior. It is also requested that Jordan be charged with operating a motor vehicle while his driving privilege is SUSPENDED, and leaving the scene of a motor vehicle crash, which again, resulted in the death of Mr. Morris.



DETECTIVE

THE COURT FINDS PROBABLE CAUSE.

JUDGE

DATE