



Sections 558.002 and 558.011, RSMo, in that on or about on or about September 24, 2023, in the County of Jackson, State of Missouri, [REDACTED], a law enforcement officer, was attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, resisted the stop of defendant by fleeing from the officer and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant operated a vehicle at speeds in excess of the posted speed limit, driving the wrong way on a divided road within the lanes of oncoming traffic while other motorists were present.

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 III. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.)**

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 September 24, 2023, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a 2012 red Ford F-150, 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,

/s/ Jordan L. Logan

State vs. Matthew T. Brooks, Case No.

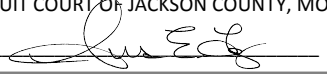
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**WITNESSES:**

The State's witnesses as of 9/27/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

27-Sep-2023 11:11

CIRCUIT COURT OF JACKSON COUNTY, MO

BY 

PROBABLE CAUSE STATEMENT

Date: 9/25/2023

Report: 2023-66263

OCN:

I, Detective Ron Baltzer, knowing that false statements on this form are punishable by law, state that the facts contained herein are true:

1. I have probable cause to believe that on **9/24/2023 at 2301 hours, Lee's Summit Rd and 23<sup>rd</sup> St, Matthew Travis Brooks, 1500 N Osage, Independence, MO, 64050**, committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 9/24/2023 at approximately 2301 hours, Officers of the Independence Police Department attempted to stop a red 2012 Ford F-150 for no observed license plate. The F-150 failed to stop for the Officer who activated his emergency lights and sirens at Lee's Summit Rd and 20<sup>th</sup> St, Jackson County, Missouri at 23:02:08 hours. The Ford F-150 failed to stop when given both visual and audible signals to do so, it fled northbound on Lee's Summit Rd. The F-150 ran the red light at Lee's Summit and Truman Rd where the Ford F-150 almost struck another vehicle. The Ford F-150 continued north to US-24 Hwy. The truck turned eastbound on US-24 Hwy. On US 24 Hwy the truck reached speeds over 100 mph while traveling in the center turn lane at times with oncoming traffic westbound on US 24 Hwy. The Ford F-150 made a right turn onto southbound Little Blue Pkwy.

As the Ford F-150 traveled southbound on Little Blue Pkwy from US-24 Hwy it failed to maintain a single lane of traffic and crossed over the double yellow centerline and drove in the northbound lane of travel two times. When the Ford F-150 reached the area where the center grass median began the truck continued traveling south in the northbound lane of the divided road. The Ford F-150 failed to return to the southbound lanes of travel and continued to the east then south in the northbound lane. At 23:06:53 hours the Ford F-150 passed at northbound motorist on the Ford F-150's left side. The other motorist had to swerve to avoid being struck. The Ford F-150 then passed a northbound motorist on the Ford F-150's right side. The patrol vehicle's speed was 91 miles per hour in the posted 50 miles per hours zone. An exact speed of the Ford F-150 could not be obtained due to the offset of the vehicles, however it appeared the F-150 was traveling at a similar speed to the patrol car that was attempting to keep up from across the divided highway.

When the Ford F-150 reached Bundschu Rd, the truck had the opportunity to return to the southbound lane, but continued past the light, and remained southbound in the northbound lanes at a high rate of speed. The highway was divided by a wide grass median. Officers terminated the pursuit, remaining in the southbound lanes, and turned off their patrol vehicles emergency lights, siren, and began slowing. The Ford F-150 disappeared from the camera view until Officers drove upon a crash. On approach, officers observed that the Ford F-150 had collided with a blue 2014 Dodge Avenger in the outside lane of traffic of northbound Little Blue Parkway south of Bundschu Rd. When Officers arrived at the crash scene, they located the driver of the F-150, identified

as Matthew Brooks, in the front left seat of the truck, trapped behind the steering wheel. A female passenger was later located hiding in the tall grass/brush approximately ten feet south of the Ford F-150.

Two other Officers responded to the Dodge Avenger and found a female driver trapped in the vehicle. Officers retrieved a baton and broke out the rear window to get to the victim. The officer found the victim to be deceased in the vehicle. The body of the deceased had to be extracted with care from the front left seat of vehicle by Independence Fire Department, and was released to Jackson Medical Examiner's Office.

A crash reconstruction investigation from the evidence at the scene revealed the following: The impact between the Ford F-150 and the Dodge Avenger occurred in the outside lane of northbound Little Blue Pkwy. When struck, the momentum of the Dodge Avenger was overcome by the momentum of the Ford F-150. The Dodge Avenger was stopped in its path of travel and knocked backwards and off the east side of the roadway.

The Ford F-150 continued southbound in the northbound lanes of Little Blue Pkwy after striking the Dodge Avenger. It continued southbound in excess of 370 feet (straight line distance) from the area of impact to the point of rest after striking the Dodge Avenger. When the Ford F-150 drove off the east shoulder of the roadway it went into a ditch striking the east side of the bank and coming to rest.

Based on reconstruction calculations, the Ford F-150 would have been traveling well above the posted 50mph speed limit while travelling the wrong way on the divided highway leading up to the collision.

Brooks was transported to an area hospital for his injuries. An Officer met Brooks at the hospital and found him to be impaired by a Controlled Substance. A consensual blood draw was taken by ER staff and transported to Children's Hospital Lab. A preliminary result showed the presence of Amphetamine and Methamphetamine. A confirmed Lab report is pending. Due to Brooks' injuries he was not able to perform SFST's or a DRE Examination.

The Ford F-150 being driven by Brooks had been reported stolen on 05/30/2023 in Fairway, Kansas. Brooks has a felony warrant for Burglary 2<sup>nd</sup> Degree.

**Ron Baltzer**

Print Name

Detective Ron Baltzer

Independence MO Police

**/s/ Ron Baltzer**

Signature