

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

POLICE NO. :	KC24051302
PROSECUTOR NO. :	095479622
OCN:	HU022812

STATE OF MISSOURI,

PLAINTIFF,)

VS.

JORGE I. ARROYO

1520 CHERRY ST

KANSAS CITY, MO 64108

DOB:

Race/Sex: B/M

S.S.N.:

DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y20201399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the Defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony Assault in the First Degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about June 30, 2024, in the County of Jackson, State of Missouri, the Defendant knowingly caused or attempted to cause serious physical injury to [REDACTED], a police officer with the Kansas City, Missouri Police Department, and special victim, who was in the performance of his official duties as a police officer, by striking [REDACTED] with with a metal chair, and in the course thereof Defendant inflicted serious physical injury on [REDACTED].

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. Armed Criminal Action (571.015-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the Defendant, in violation of Section 571.015, RSMo, committed the **Felony of Armed Criminal Action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about June 30, 2024, in the County of Jackson, State of Missouri, the Defendant committed the Felony of Assault in the First Degree, charged in Count 1, all allegations of which are incorporated herein by reference, and the Defendant committed the foregoing Felony of Assault in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

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/ Luke H. Alsobrook

State vs. JORGE I ARROYO, Case No.

Luke H. Alsobrook (#66442)
Assistant Prosecuting Attorney
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WITNESSES:

The State's witnesses as of 7/1/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 06-30-2024

CRN: KC24051302

I, [REDACTED], Kansas City Missouri Police Department, Assault Squad
(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 06-30-2024, at 10 E. 13th St in
(Date) (Address)

Kansas City, Jackson Missouri Jorge I. Arroyo
(County) (Name of Offender(s))

a Hispanic male committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 06-30-2024, at approximately 0816 hours, officers of the Kansas City, Missouri Police Department were dispatched to Cosentino's Downtown Market located at 10 E. 13th Street, Kansas City, Jackson County, Missouri, for a reported assist the officer. A sergeant with the Kansas City, Missouri Police Department was working off duty, in uniform, at that location providing security, and had called for an assist advising he was down. Upon arrival, officers found Jorge I. Arroyo being restrained by staff and customers, and found the sergeant injured. He was transported to a local hospital for treatment.

During a preliminary interview at the hospital, the sergeant stated the following: At the request of store staff, he had asked the male to leave since he had previously been trespassed from the store for stealing. [REDACTED] began placing the male's items outside the store when the male became enraged, picked up a metal chair, and hit him in the head with the chair approximately 3-4 times. The sergeant tripped and fell to the ground while the male continued striking him, either with the chair or by punching him. The male had knocked his microphone off, and he had difficulty finding his radio, but managed to radio for assistance. In the meantime, others at the store jumped on the male and pulled him off the sergeant. He did not lose consciousness but felt as though he was about to.

Arroyo was subdued and restrained by customers and employees who came to the sergeant's assistance until officers arrived and took him into custody at 0818 hours. Arroyo was not interviewed due to his aggressiveness.

WIT#1 stated the following: He was in the store when he heard yelling, walked around the corner, and observed the sergeant lying on the ground with Arroyo on top of him. Arroyo began punching the sergeant numerous times with the sergeant attempting to protect his head. WIT#1 ran down the aisle and tackled Arroyo and helped hold onto him until he was handcuffed and officers arrived.

WIT#2 stated the following: He did not wish to give his last name or identifying information, but advised he was inside by the registers when he heard yelling and saw Arroyo swing the chair and strike the sergeant with it.

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Another party tackled him and WIT#2 helped hold him on the ground. The sergeant slid his handcuffs over to him and WIT#1 handcuffed Arroyo.

WIT#3, a store manager, stated the following: He was in the back of the store when he heard yelling. He approached and saw Arroyo hit the sergeant in the head with a metal chair. The sergeant fell to the ground and Arroyo began punching him in the back of the head. A nearby shopper tackled Arroyo and WIT#1, along with several other parties, then held him on the ground until police arrived. WIT#3 recognized him as a frequent trespasser at the location who had been arrested before.

WIT#4, an employee at the store, stated the following: He heard yelling and observed Arroyo swinging the chair. While Arroyo was on top of the officer and punching him, he could hear Arroyo state "I'm going to kill you." After Arroyo was restrained, he rendered aid to the sergeant by placing towels on his head.

At the time of this report, the sergeant has multiple injuries including to one hand (possibly broken) and is underwent surgery to repair the serious physical injury laceration to his head, which will not stop bleeding. The laceration required approximately twenty (20) to thirty (30) stitches to close the wound.

The metal chair sustained damage and had apparent blood and flesh sticking to it. Video of the incident exists and depicts the suspect chasing the sergeant and striking him over the head with the metal chair, as well as punching him in the back of the head after he is down on the ground.

Arroyo's criminal history does not appear to exist and he does not have a state ID. Based upon his Colombian passport he appears to be from that country, and should be regarded as a flight risk. Arroyo's extreme aggression and the level of injury inflicted upon the sergeant in full police uniform render him a danger to the public and to other law enforcement, and he is unlikely to appear on a summons.

Printed Name _____ Signature /s/ _____

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

Judge

Circuit Court of _____ County, State of Missouri.