IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

DOI ICE NO . VC25016215

I OLICE NO	KC23010313
PROSECUTOR NO.:	095483602
OCN:	
STATE OF MISSOURI,)
PLAIN	NTIFF,)
vs.)
)
ROBERT L. BEEBE)
428 CYPRESS AVE) CASE NO. 2516-CR
KANSAS CITY, MO 64124) DIVISION
DOB:)
Race/Sex: W/M)
S.S.N.:)
DEFENI	DANT.)

COMPLAINT WARRANT REQUESTED

Count I. Resisting Arrest/Detention/Stop By Fleeing - Creating A Substantial Risk Of Serious Injury/Death To Any Person (575.150-002Y20204801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **class E felony of resisting a lawful stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about on or about March 18, 2025, in the County of Jackson, State of Missouri, PO Clayton True and PO Dominic Bristol, law enforcement officers, were attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officers were making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant rammed his vehicle into an occupied police vehicle.

•

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 II. Unlawful Possession Of A Firearm (571.070-004Y20245212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class C felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about March 18, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 9mm Smith and Wesson handgun, a firearm, and on Februry 1, 2024, the defendant was convicted of the felony of possession of a controlled substance in the Circuit Court of Jackson County, Missouri.

The range of 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.

Count III. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(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 March 18, 2025, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a black 2013 Infiniti G37X, 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.

MELESA N. JOHNSON

Prosecuting Attorney Jackson County, Missouri by,

/s/ Gerald Jackson

Gerald Jackson (#66995) Assistant Prosecuting Attorney 415 East 12th Street 11th Floor Kansas City, MO 64106 (816) 881-3555 gjackson@jacksongov.org

WITNESSES:

The State's witnesses as of 3/20/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

State vs. Robert L. Beebe, Case No.