

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

Police# 16-008230
Prosecutor# 095429650
1616-CR
OCN# AN012960

COMPLAINT

STATE OF MISSOURI

vs.

**Anthony D. Donlan
2122 S. Ellison Way
Independence, MO 64050
DOB: 08/03/1998; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Robbery 1st Degree (569.020-001Y19791207.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with others forcibly stole guns owned by [REDACTED], and in the course thereof the defendant or, another participant in the crime used and threatened the immediate use of a dangerous instrument against [REDACTED] and or [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 (571.015-001Y19755299.0)

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 February 1, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony

of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count III. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841305.0)

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 of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant struck [REDACTED], and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof 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 IV. Armed Criminal Action (571.015-001Y19755299.0)

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 February 1, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count III, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count V. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20145299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(4), RSMo, committed the class D felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about February 2, 2016, at 3921 S. Bolger Dr., in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a hand gun, a weapon readily capable of lethal use, in an angry or threatening manner.

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 two (2) years 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 five thousand dollars (\$5,000); or by both imprisonment and a fine.

Count VI. Robbery 1st Degree (569.020-001Y19791204.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 2, 2016, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with others, forcibly stole a wallet and cell phone owned by [REDACTED], and in the course thereof the defendant or another participant in the crime was armed with a deadly weapon.

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 VII. Armed Criminal Action (571.015-001Y19755299.0)

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 February 2, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count VI, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

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.

THE STATE OF MISSOURI

vs.

Anthony D. Donlan

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,



Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

DET Kurt Wyckoff , 223 N. Memorial Drive, Independence, MO 64050

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

Police# 16-008230
Prosecutor# 095429672
1616-CR
OCN# an012960

COMPLAINT

STATE OF MISSOURI

vs.

**Dyllan M Reade
1350 N. Osage St.
Independence, MO 64050
DOB: 07/24/1998; Race/Sex: W/M;**

**██████████
Defendant.**

Count I. Robbery 1st Degree (569.020-001Y19791204.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 2, 2016, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with others, forcibly stole a wallet and cell phone owned by ██████████, and in the course thereof the defendant or another participant in the crimewas armed with a deadly weapon.

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.

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of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

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Prosecuting Attorney
Jackson County, Missouri
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Michael J. Hunt (#34818)
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Independence, Missouri 64050
(816) 881-3856
mhunt@jacksongov.org

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

PO Maggy Chapman , 223 N. Memorial Drive, Independence, MO 64050

PO Milton Cox , 223 N. Memorial Drive, Independence, MO 64050

PO Jason Cundiff , 223 N. Memorial Drive, Independence, MO 64050

PO Brett Duncan , 223 N. Memorial Drive, Independence, MO 64050

PO Joseph Farnsworth , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED]

PO Justin Marriott , 223 N. Memorial Drive, Independence, MO 64050

SGT Steven McVay , 223 N. Memorial Drive, Independence, MO 64050

DET Brice Minter , 223 N. Memorial Drive, Independence, MO 64050

PO Jeffrey Nunn , 223 N. Memorial Drive, Independence, MO 64050

CST Dale Perry , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED], MO 64050

[REDACTED]

[REDACTED]

PO Edward Wisdom , 223 N. Memorial Drive, Independence, MO 64050

DET Kurt Wyckoff , 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 2/2/2016

Report #: 2016-8391

I, Kurt Wyckoff, a Detective with the Independence, Missouri, Police Department, 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 2/2/2016, at 1305 hours, Dyllan M. Reade, (Race- white, Sex- male, DOB- 07-24-1998, Address-1350 N. Osage, Independence MO, 64050, SSN- [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

Report 2016-8230: On 02/01/2016 at approximately 2018 hours, Independence Police Officers were dispatched to the residence of 1345 S. Baker Drive regarding a home invasion Armed Robbery.

Based on the investigation, it was reported that the residents and or victims identified as Mary L. **STUCKER**, Jeffrey E. **STUCKER** and Christopher F. **GIBSON** were located in the living room when they heard a knock on the front door. As Mary Stucker answered the door, she was contacted by an unknown Caucasian male, approximately (18-22) years of age, 5'9"-6'00", 150 lbs., with dark hair, a dark thin mustache, and a black hooded sweatshirt. Based on the investigation, it was determined that this suspect was identified as Joseph C. **ANDERSON**.

ANDERSON inquired if "Andrew" (and or Mary Stucker's son identified as Andrew **BLANCHARD**) resided at the residence. She stated that he did not reside at the residence anymore as **ANDERSON** forced his way inside the residence and displayed a black unknown make/model/caliber semi-automatic handgun and ordered all three victims onto the floor behind the couch while pointing the firearm at Mary Stucker's head.

A second unknown Caucasian male entered the residence. He was further described as being approximately (17-20) years of age, 5'9"-6'00", 135 lbs., with blond bushy hair, and wearing a black hooded sweatshirt. The second suspect walked over to Christopher Gibson, who had not immediately complied by lying down on the floor and was struck with a pair of brass knuckles above his right eye. Based on the investigation, it was determined that this suspect was identified as Anthony D. **DONLAN**.

DONLAN inquired about the location of their two firearms as Jeffrey Stucker initially stated that they did not have any firearms. **DONLAN** then began to punch and kick him about the body and face as he was positioned on the floor. Eventually, Jeffrey Stucker advised the location of the firearms as he indicated that the weapons were located on the desk (located in the living room). As **DONLAN** was attempting to locate the firearms, a third unknown Caucasian male with unknown description entered the residence. It was further reported by the victims that this particular subject did not make any statements or take any overt actions. Based on the investigation, it was determined that this suspect was identified as Saili A. **PRADO**.

Once obtaining possession of the firearms, all three suspects departed from the residence as they departed in an unknown white 4-door vehicle.

Report 2016-8382: On 02/02/2016 at approximately 1233 hours, Independence Police Officers were dispatched to the McDonald's restaurant located at 3921 S. Bolger Drive regarding a reported Aggravated Assault. It was reported by the McDonald's owner and or victim identified [REDACTED] that as he arrived to the business he observed five Caucasian males already seated in the lobby area of the restaurant and assumed that they had previously purchased food prior to his arrival; which did not include soda beverages because they retained cups that were designated for water only. However, several subjects were observed retrieving soda/Gatorade from the fountain drink dispenser as the subjects were eventually confronted by the general manager as asked to stop dispensing soda as this was not included with the price of their meals. [REDACTED] further indicated that all five subjects were Caucasian males, late teens to early twenties.

He provided further descriptions of two suspects that took more of an active role during the incident as they were described as the following:

-SUSPECT #1: Caucasian male, late teens to early twenties, approximately 5'09"-5'10", 170 lbs., black short hair wearing a black t-shirt and black "baggy" style jeans. Based on the investigation, it was determined that this suspect was identified as Joseph C. **ANDERSON**.

-SUSPECT #2: Caucasian male, late teens to early twenties, approximately 5'08"-5'09", 150-160 lbs., blond hair, acne; wearing a red "skull" cap with a fuzzy style ball on top, red jacket and possibly jeans. Based on the investigation, it was determined that this suspect was identified as Anthony D. **DONLAN**.

[REDACTED] advised that after all of the suspects were confronted about taking soda/Gatorade from the fountain dispenser, several of the outcry suspects made a few comments. However, **ANDERSON** advised that if they wanted the soda that they should just take it and walk out of the business.

[REDACTED] advised that he directed his attention towards **ANDERSON** and engaged in conversation, the other four suspects began to exit into the vestibule area. As [REDACTED] was conversing with **ANDERSON** about the incident, **DONLAN** was standing halfway in between the vestibule and lobby area as he propped the door open. [REDACTED] advised that as **DONLAN** stated something to him, he turned his attention towards him as he struck him in the face with a cup of water. [REDACTED] stated that as he took one step towards **DONLAN**, he pulled out an unknown black in color unknown make/model/caliber semi-automatic handgun and pointed it directly at him. All of the suspects were then reported to have departed in a 1990's white Cadillac 4-door sedan bearing Missouri license plate #AJ1-R4M.

On 02/02/2016 at approximately 1710 hours, Detective Brice Minter contacted [REDACTED] and presented a photo array consisting of (6) Caucasian male subjects with similar characteristics and features as a possible suspect was placed in position number (3); who was identified as Anthony L. Donlan. After presenting the array, [REDACTED] made a positive indication and identified Donlan as the suspect.

Report 2016-8391: On 02/02/2016 at approximately 1304 hours Independence Police officers were dispatched to the Discount Smokes, 9935 E. Truman Rd, in reference to an armed robbery. The victim, identified as [REDACTED] stated that as he was exiting the store he was approached by white male with a handgun. The subject advanced on him and yelled "Give me your fucking wallet". The victim attempted to remove his wallet from his sweatpants but was unable to get it out. He stated that the suspect became impatient and ran up to him and struck him in the head with the pistol. The victim stated that he fell to the ground at which time the suspect and another subject began to root through his pants where they removed his wallet and cellular phone, a Samsung Galaxy SIII. The victim stated that once the subjects removed the items they ran back to a white older model Cadillac that was parked at the gas pumps.

Based on the investigation it was later determined that the subject that robbed and struck the victim was Dyllan **READE**. It was also later learned that Anthony **DONLAN** was the second subject out of the car that assisted in emptying the victim's pockets. Saili **PRADO** later told detectives that he was present for the robbery and also ran up to the victim as he was on the ground, but denied taking anything from to victim or assaulting him.

On 02/02/2016 at approximately 1730 hours Detective Wyckoff presented the victim with a photo array consisting of (6) Caucasian male subjects with similar characteristics and features as of the possible suspect. The victim immediately identified **READE** as the person that robbed him at gunpoint.

Independence Police Dispatch broadcasted the suspect vehicle description as provided by the victim.

On 02/02/2016 Officer Nunn observed the suspect vehicle at the Express Mart, 11622 E. 24 Hwy. As Officer Nunn was waiting for additional units to respond the vehicle left the gas station and travelled northbound on Vassar St. at a high rate of speed. Officers attempted to stop the vehicle by activating their emergency equipment but the vehicle refused to pull over and a pursuit was initiated.

The pursuit went through residential areas of Sugar Creek Missouri and then back to Independence through Mill Creek Park. Officer Nunn advised that the vehicle then travelled through a school zone (Mill Creek Elementary) at approximately 60 mph. The pursuit continued and the vehicle was partially disabled by the deployment of stop sticks in the area of Liberty St and Kentucky Rd. The vehicle continued and entered 291 Hwy northbound. The vehicle maintained speeds of 70 to 80 mph despite losing parts of its tires.

The vehicle then crossed over 291 Hwy by driving through some yellow posts just before the Missouri River. It then continued northbound in the southbound lanes over the Missouri River on the bridge. The vehicle exited at 210 Hwy and travelled eastbound. The vehicle continued to lose parts of tires and had debris falling off of it as it travelled. The vehicle then exited onto 435 Hwy southbound. At this time several KCPD officers had joined the pursuit.

The vehicle then pulled off the roadway and came to rest in a muddy area just north of Wilson Rd. One of the occupants, later identified as [REDACTED] surrendered at the vehicle. The other four occupants, later identified as **ANDERSON**, **PRADO**, **READE**, and **DONLAN**, all ran from the vehicle and were apprehended in the wooded area with the assistance of the KCPD helicopter.

The suspect vehicle was towed from the scene and a search warrant was obtained for the vehicle. The following items of evidence were recovered by Independence Detectives Burris and Jarnagin:

- Item # 1 – DNA Swab – from the steering wheel.
- Item # 2 – Missouri Driver's License for Zachary Wedel – from the front passenger seat.
- Item # 3 – Rock Island Armory .45 caliber semi automatic pistol – from underneath front passenger seat. Serial # R1A1231461 (*Reported Stolen in home invasion – IPD case # 2016-8230*)
- Item # 4 – Hi-Point CF .380 caliber semi automatic pistol – from underneath the driver's side seat. Serial # P763817.

Detective Jarnagin interviewed [REDACTED] after reading him his warning of rights. [REDACTED] stated that he moved in with Anderson and two days ago and was paying rent by letting Anderson use his vehicle, the white Cadillac. He stated that on today's date he, **ANDERSON, PRADO, READE,** and **DONLAN** had been driving around. He stated that at the gas station at 9935 E. Truman **READE** and **PRADO** exited the car after **ANDERSON** pointed to Zachary WEDEL and stated "Let's get this guy". He stated that **READE** approached the victim with a gun and then struck him in the head. He advised that **PRADO** was with **READE** when the victim went down. He advised that they ran back to the car and **READE** stated "I hit that guy with my gun". They then left with **ANDERSON** driving and minutes later they got into a high speed pursuit with Police.

Detective Wyckoff interviewed Sali **PRADO** after reading him his warning of rights. **PRADO** stated that he was present during the home invasion on at 1345 Baker Drive. He stated that **DONLAN** and **ANDERSON** were the other participants. He stated that **DONLAN** struck the victims in the face while wearing the brass knuckles and demanding their firearms. **PRADO** then stated that he was present today when **READE** committed the robbery at the gas station. He stated that he exited the car as **READE** was knocking the victim to the ground. He stated that he came to within two to three feet of the victim before they ran back to the car. **PRADO** advised that they then got into a high speed chase with police.

Detective Minter interviewed Joseph **ANDERSON** after reading him his warning of rights. **ANDERSON** stated on 01/22/16 he was robbed by three men at gunpoint at his residence. He stated that they were looking for marijuana. He stated that **DONLAN** advised him that he knew where he could obtain several guns that they could utilize for their protection. He stated that on 02/01/2016 he, **DONLAN,** and **PRADO,** arrived to an unknown residence off of Truman Rd. or Lee's Summit Rd, described as a townhouse or an apartment. **ANDERSON** stated that he knocked on the door and a female answered the door. He asked for "Drew" and she advised that he does not reside at the residence and she advised that "Drew" was her son.

ANDERSON advised that once he verified that it was the correct address he brandished a BB gun pistol and all three forced their way into the residence. They were confronted by two males inside the residence at which time **DONLAN** struck one of the male victims in the face, knocking him unconscious, and striking the second male victim repeatedly about the body, as they repeatedly asked the victims for the locations of the firearms. After the second male was struck the female advised him to tell where the firearms were located. **ANDERSON** stated that they still could not locate the firearms so eventually the male victim located the firearms and handed them to **DONLAN** and **PRADO**. The firearms had been on a computer desk in the living room and were both holstered. **ANDERSON** stated that one firearm was a

Luger .380 and the other was an unknown make .45 caliber. **ANDERSON** stated that they then all fled the scene in the white Cadillac.

ANDERSON stated that on today's date they were all driving around and ended up at the Discount Smokes, 9935 E. Truman Rd. He stated that **READE** exited the car as they were sitting at the pumps. He stated that he then heard **READE** say "Give me your fucking wallet". **ANDERSON** stated that he was behind a pillar and did not see what was happening and did not know who else exited the vehicle to assist **READE**. He stated that **READE** got back into the car and told him to "go". **ANDERSON** stated that they drove to another gas station at which time he saw an Independence Police Officer. He stated that they all got into the vehicle and he drove. He stated that he led officers on a high speed pursuit. He stated that at one point he went the wrong way on 291 Hwy in an effort to evade capture. He advised that their vehicle was eventually disabled and they all ran from the vehicle.

Detective Cox interviewed Dyllan **READE** after reading him his warning of rights. He refused to give a statement and requested an attorney.

Detective Jarnagin interviewed Anthony **DONLAN** after reading him his warning of rights. **DONLAN** stated that he "got in the wrong car". He stated that they were supposed to go to Bass Pro Shops with the other subjects. He then refused to give any other statements.

Kurt Wyckoff

Print Name

Signature



THE COURT FINDS PROBABLE CAUSE:

Date

Judge

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

Police# 16-008230
Prosecutor# 095429675
1616-CR
OCN# an012958

COMPLAINT

STATE OF MISSOURI

vs.

**Joseph C Anderson Jr.
1315 S. Osage St.
Independence, MO 64055
DOB: 07/21/1997; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Robbery 1st Degree (569.020-001Y19791207.0)

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An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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Count III. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841305.0)

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 of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant struck [REDACTED], and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED] and was done for the purpose of committing such assault, and in the course thereof 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.

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Count VI. Armed Criminal Action (571.015-001Y19755299.0)

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 February 2, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count VI, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count VII. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20054801.0)

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 D felony of a lawful stop, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about February 2, 2016, in the county of Jackson, State of Missouri, P.O. Nunn and other law enforcement officers, were attempting to make a lawful stop of 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 the defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that the defendant drove and high speeds and went the wrong way on the one way portion of highway 291.

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 two (2) years 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 five thousand dollars (\$5,000); or by both imprisonment and a fine.

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.

THE STATE OF MISSOURI

vs.

Joseph C Anderson Jr.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,



Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
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(816) 881-3856
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WITNESSES:

[REDACTED]
[REDACTED]
PO Cody Burch , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
[REDACTED]
PO Maggy Chapman , 223 N. Memorial Drive, Independence, MO 64050
PO Milton Cox , 223 N. Memorial Drive, Independence, MO 64050
PO Jason Cundiff , 223 N. Memorial Drive, Independence, MO 64050
PO Brett Duncan , 223 N. Memorial Drive, Independence, MO 64050
PO Joseph Farnsworth , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
DET Kyle Jarnagin , 223 N. Memorial Drive, Independence, MO 64050
PO Justin Marriott , 223 N. Memorial Drive, Independence, MO 64050
SGT Steven McVay , 223 N. Memorial Drive, Independence, MO 64050
DET Brice Minter , 223 N. Memorial Drive, Independence, MO 64050
PO Jeffrey Nunn , 223 N. Memorial Drive, Independence, MO 64050
CST Dale Perry , 223 N. Memorial Drive, Independence, MO 64050
PO Richard Remington , 223 N. Memorial Drive, Independence, [REDACTED]

[REDACTED]
[REDACTED]
PO Gary Starks , 223 N. Memorial Drive, Independence, MO 64050
PO Dustin Stewart , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
PO Edward Wisdom , 223 N. Memorial Drive, Independence, MO 64050
DET Kurt Wyckoff , 223 N. Memorial Drive, Independence, MO 64050

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

Police# 16-008230
Prosecutor# 095429673
1616-CR
OCN# an012955

COMPLAINT

STATE OF MISSOURI

vs.

**Saili A. Prado
5207 Overton Circle
Kansas City, MO 64133
DOB: 06/30/1996; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Robbery 1st Degree (569.020-001Y19791207.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with others forcibly stole guns owned by [REDACTED], and in the course thereof the defendant or, another participant in the crime used and threatened the immediate use of a dangerous instrument against [REDACTED] and or [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 (571.015-001Y19755299.0)

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 February 1, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony

of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count III. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841305.0)

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 of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant struck [REDACTED], and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED], and was done for the purpose of committing such assault, and in the course thereof 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 IV. Armed Criminal Action (571.015-001Y19755299.0)

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 February 1, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count III, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count V. Robbery 1st Degree (569.020-001Y19791204.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about February 2, 2016, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with others, forcibly stole a wallet and cell phone owned by [REDACTED], and in the course thereof the defendant or another participant in the crimewas armed with a deadly weapon.

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 VI. Armed Criminal Action (571.015-001Y19755299.0)

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 February 2, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count VI, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

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.

THE STATE OF MISSOURI

vs.

Saili A. Prado

JEAN PETERS BAKER

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Jackson County, Missouri
by,



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WITNESSES:

[REDACTED]

[REDACTED]

PO Cody Burch , 223 N. Memorial Drive, Independence, MO 64050

DET Christopher Burris , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED] 64050

PO Milton Cox , 223 N. Memorial Drive, Independence, MO 64050

PO Jason Cundiff , 223 N. Memorial Drive, Independence, MO 64050

PO Brett Duncan , 223 N. Memorial Drive, Independence, MO 64050

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SGT Steven McVay , 223 N. Memorial Drive, Independence, MO 64050

DET Brice Minter , 223 N. Memorial Drive, Independence, MO 64050

PO Jeffrey Nunn , 223 N. Memorial Drive, Independence, MO 64050

CST Dale Perry , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED]

PO Gary Starks , 223 N. Memorial Drive, Independence, MO 64050

PO Dustin Stewart , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

DET Todd Winborn , 223 N. Memorial Drive, Independence, MO 64050

PO Edward Wisdom , 223 N. Memorial Drive, Independence, MO 64050

DET Kurt Wyckoff , 223 N. Memorial Drive, Independence, MO 64050