# IN THE CIRCUIT COURT OF JACKS/ON COUNTY, MISSOURI AT KANSAS CITY

Police# 15-091927 Prosecutor# 095431428 1616-CR OCN# W5004521

### **COMPLAINT**

STATE OF MISSOURI

VS.

### Count I. Assault 2nd Degree (565.060-001Y19841399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.060, RSMo, committed the Class C Felony of Assault in the Second Degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about December 21, 2015, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to by failing to obey school bus stop sign and failing to yield to a pedestrian in the roadway.

The range 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 two (2) years 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

## Count II. Fail To Stop For School Bus That Is Receiving/discharging School Children - Resulting In Injury To Child Per Section 304.070 (304.050-001Y20065405.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 304.050, RSMo, committed the Class D Felony of Failing to Stop for a School Bus Receiving or Discharging School Children, punishable upon conviction under Section 304.070, 558.011, and 560.011, RSMo, in that on or about December 21, 2015, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle E. 84th Terr. and Hillcrest Rd., and failed to stop for a properly signaling school bus which was stopped for the purpose of receiving or discharging school children resulting in an injury to a child,

#### THE STATE OF MISSOURI

VS.

### Aminah Z. Ali

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. 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 up to a maximum of twenty thousand dollars (\$20,000).

### Count III. Leaving Scene Of Motor Vehicle Accident - Injury, Property Damage Or 2nd Offense (577.060-001Y19795401.0)

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 21, 2015, the defendant, while operating a motor vehicle on Hillcrest Road, a highway, at or near E. 84th Terrace in the County of Jackson, State of Missouri, was a party to an accident that caused another person to sustain physical injury, 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.

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. 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 up to a maximum of twenty thousand dollars (\$20,000).

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,

Brady X. Twenter (#49380) Assistant Prosecuting Attorney 415 East 12th Street 11th Floor Kansas City, Missouri 64106 BTwenter@jacksongov.org

### THE STATE OF MISSOURI

vs.

### Aminah Z. Ali

### WITNESSES:

DET Kurtis J. Anderson, 1125 Locust, Kansas City, MO 64106

Prosecuting Atty. Office, Kansas City, MO 64106

Dominick Conrad, Prosecuting Atty. Office, Kansas City, MO 64106

PO Daniel Pennycuff, 1125 Locust, Kansas City, MO 64106

PO Paul S. Russo, 1125 Locust, Kansas City, MO 64106

### PROBABLE CAUSE STATEMENT FORM

Date: 04/13/2016		CRN: <b>15-091927</b>			
I, Det. Kurtis Anders					
(Name and identify law enform knowing that false state I have probable cause to the state of the	ements on this for	m are punishable 12/21/2015	by law, state that th		contained herein are true.  nd Hillcrest Rd.
	kson Missouri		ALI Offender(s)	B/F	(Address) 11/17/1994
committed one or more LSMVA	ounty) e criminal offense(	,	Offender(s)		(Description of Identity)
The facts supporting th	nis belief are as fol	lows:			
On 12/21/2015, at 2143 hours to an injury accident that had o					ve. (Metro Patrol Division) in regard issouri.
from the bus. exite third in line behind the bus go impact threw him off the road through the window. He then called 911 while in route and the same of the called 911 while in route and the same of the called 911 while in route and the same of the called 911 while in route and the called 911 while 911 whi	while the children we define the bus after all the of tout of line and passed way and into the bushed responded to his son a told them where the in lowed the suspect and	Jr., off from scho re getting off the bus other children and he d the bus in the medi es next to the apartm and the car fled the sc cident occurred. Wh recorded the license	ool. The bus stopped for the stop was walking to the buston. The car struck ent sign. He made eye cene, squealing its tirestile at the hospital, he results in the stopped for	acing north ped behinds stop. A as contact was. He then received a being relea	e apartment complex at 84th and hbound on Hillcrest and activated its d the bus and southbound, across white car that had been stopped he was crossing the street. The with the driver and shouted at her a took his son to the hospital and phone call from the school principal sed from the hospital, he responded om the crash.
Hillcrest, on Hillcrest, to let ch	hildren off. The stop be the older kids got off the vard the bus. The left into oncoming	oar and flashing light te bus. She observed exited the bus and r	s were activated on the the father of one child an in <u>front of the</u> bus a	bus and s and waiv and across	ed at her fourth stop at 84th Terr. and she had the two kindergarten red for the father to come to the bus. the street. Meanwhile, a white ibu took off and fled the scene. The
to the defendant (AMINAH Z	Z. ALI, B/F, 11/17/199 with the defendant and	94). I obtained a pict five other individual	ure of the defendant fr s whom matched the de	om Misso	a 2011 Chevrolet Malibu registered uri Department of Revenue. I made of the suspect of the hit and run.
A stop order was issued for the defendant of her Miranda Righ					Police Detective advised the
A computer check revealed the defendant to have a valid operator's license through Missouri Department of Revenue.					
Printed Name Det. Ku	rtis Anderson #501	19 Si	gnature <u>Del.</u> k	whi.	day of
The Court finds probab	ole cause and direct	ts the issuance of	a warrant this		day of
Judge					
Ci	ircuit Court of		County, St	ate of M	lissouri.