

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

Police# 16-032625
Prosecutor# 095432036
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Curtis R. Ayers
206 S. Village
Tonganoxie, KS 66086
DOB: 05/19/1987; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841304.0)

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 May 9, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] by shooting her.

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 May 9, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of assault 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 assault 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 III. Discharge/shoot Firearm At Or From Motor Vehicle/shoot At Person, Another Motor Vehicle, Or Building/habitable Structure- (571.030-001Y20035213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about May 9, 2016, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a motor vehicle, i.e. a white Chrysler 300, and, as a result of the above described conduct [REDACTED] suffered injury.

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 (571.015-001Y19755213.0)

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 May 9, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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 V. Discharge/shoot Firearm At Or From Motor Vehicle/shoot At Person, Another Motor Vehicle, Or Building/habitable Structure- (571.030-002Y20035213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the class B felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about May 9, 2016, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a motor vehicle, i.e. a 2005 silver Volkswagen Passat.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count VI. Armed Criminal Action (571.015-001Y19755213.0)

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 May 9, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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 resisting a lawful stop, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about May 9, 2016, in the county of Jackson, State of Missouri, Officer R. Anderson, a law enforcement officer, was attempting to make a lawful stop of a vehicle being operated by the defendant, and the defendant knew or reasonably should have known that the officer was making a lawful, and, for the purpose of preventing the officer from effecting the stop, resisted the stop of defendant by fleeing from the officer 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 operated a motor vehicle on 85th Street at speeds above the posted speed limit and failed to stop at multiple traffic signals before colliding into a concrete barrier on Bannister Road.

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.

THE STATE OF MISSOURI

vs.

Curtis R. Ayers

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Bryan O. Covinsky (#47132)
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WITNESSES:

PO Luke T. Little , 1125 Locust, Kansas City, MO 64106

PO Michael P. Livers , 1125 Locust, Kansas City, MO 64106

██████████ Prosecuting Atty. Office, Kansas City, MO 64106

DET Dawn M. Minor , 1125 Locust, Kansas City, MO 64106

██████████ , Prosecuting Atty. Office, Kansas City, MO 64106

DET Terrence D. Owens , 1125 Locust, Kansas City, MO 64106

PO Matthew E. Rittenhouse , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 05/09/2016

CRN: 16-32625

I, Detective Dawn Minor, #4898
(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 05/09/2016, at Bannister and 71 Highway in
(Date) (Address)

Kansas City, Jackson Missouri Ayers, Curtis R.
(County) (Name of Offender(s))

W/M 05/19/1987, SS# committed one or more criminal offense(s).
(Description of Identity)

- Armed Robbery
Armed Criminal Action
Aggravated Assault

The facts supporting this belief are as follows:

On 05/09/2016 at 1431 hours, officers of the Kansas City Missouri Police Department were in the area of Bannister and 71 Highway when they observed a silver Ford Focus that matched the description of a suspect vehicle involved in the shooting of a law enforcement officer which took place on 05-09-2016 in Kansas City Kansas. Officers attempted to stop the vehicle which refused to yield and eventually crashed at Bannister and 71 Highway, Kansas City, Jackson County, Missouri.

The driver of the vehicle, who was later identified as the suspect, AYERS, CURTIS R. W/M 05/19/1987, fled from the suspect vehicle on foot. Officers observed that the suspect was armed with a "long gun" as he ran away from the vehicle.

Ayers ran up onto north bound 71 Highway where he confronted Victim #1. Victim #1 stated she was travelling northbound on 71 Highway in her white 2005, Chrysler 300 when she came up on a traffic backup which made her stop her vehicle. AYERS came to the passenger side of the victim's vehicle then walked around directly in front of her car. AYERS pointed a gun at her and told her to get out of her car. The victim put her car in drive. AYERS shot two rounds from the firearm into the victim's vehicle. Victim #1 realized she had been shot and pulled her vehicle over further north on the highway where she was later contacted by responding officers and medical personnel.

Victim #1 was shown a photo lineup consisting of a photo of the suspect AYERS, CURTIS R., W/M, 05-19-1987 and five photos of males of similar appearance. The victim identified the photo of AYERS as the man who shot her.

Victim #2 stated the following: He was going northbound on 71 Highway in the area north of 75th Street when he observed the suspect in the highway. The suspect initially had his back to him, but then turned around and shot at Victim #2's vehicle one time, striking the vehicle. Victim #2 then fled the scene.

PROBABLE CAUSE STATEMENT FORM

CRN 16-32625

Witness #1 (law enforcement officer) stated that he observed a silver Ford Focus with a Kansas license plate in the area of 69th and 71 Highway, which matched a pick-up description of the vehicle that had been involved in a shooting of a law enforcement officer in Kansas City Kansas. Witness #1 observed the vehicle make several lane changes to get past other vehicles. The suspect vehicle made a sudden swerve from the left lane of 71 Highway to the exit ramp of 85th Street.

Witness #1 activated his emergency equipment and attempted to catch up to the vehicle. The vehicle made a right turn onto 85th Street and then failed to stop for a red traffic light at 85th and Hickman Mills as it made a left turn onto southbound Hickman Mills. The vehicle ran the traffic light at Blue River Road, reentering southbound 71 Highway. The vehicle accelerated rapidly onto 71 Highway, before taking the Bannister Road exit. The witness took the Bannister Road exit and observed that the vehicle had attempted to make a left turn onto eastbound Bannister Road.

The vehicle did not successfully make the left turn on Bannister and had collided with one of the concrete bridge supports. Witness #1 then observed the listed suspect on foot behind the last bridge support. Witness #1 pulled forward and observed that the party was armed with a long gun. Witness #1 stopped and exited his vehicle and observed the suspect run into the brush where he lost sight of him. Witness #1 heard two shots fired, but was not sure where they had come from.

Witness #2 (law enforcement officer) advised he and his partner were responding to the scene to back up Witness #1 and look for the suspect who had fled on foot. While on Bannister just east of 71 Highway Witness #2 heard a gunshot coming from the area of 71 Highway. He saw smoke from the suspect's weapon and sighted in on that area and observed the suspect. Witness #2 fired one round from his patrol rifle, immediately stopping the suspect. Other officers responded to the suspect's location and took him into custody and rendered medical attention.

Printed Name Detective Dawn Minor, #4898

Signature Detective Dawn Minor, #4898

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

Judge

Circuit Court of _____ County, State of Missouri.