# IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT

Police# 16-047233 Prosecutor# 095433107 1616-CR OCN# B2104933

### **COMPLAINT**

STATE OF MISSOURI

VS.

Defendant.

#### Count I. Tampering With Motor Vehicle 1st Degree (569.080-002Y20052902.0)

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 C felony of tampering in the first degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about July 4, 2016, in the county of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile, specifically a Chrysler 300 automobile.

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).

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 II. 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 July 4, 2016, in the county of Jackson, State of Missouri, law enforcement officers, were 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 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 in excess of the posted speed limit and failed to maintain the proper lane of traffic.

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 range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed one thousand dollars (\$1,000); 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. Assault 2nd Degree (565.060-001Y19841305.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.060, 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 July 4, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to the means of a dangerous instrument, by striking him with vehicle Defendant was operating.

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 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 **unclassified felony of armed criminal action**, punishable upon conviction under Section 571.015.1, 571.015.2, and 571.015.3 RSMo, in that on or about July 4, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of assault in the second 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 second degree charged in Count III 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 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.

#### Dallas C. Letchworth

#### **JEAN PETERS BAKER**

Prosecuting Attorney Jackson County, Missouri by,

James F. Stigall (#65391) Assistant Prosecuting Attorney 415 E. 12th St., Fl 7M Kansas City, Missouri 64106 (816) 881-3538 JStigall@jacksongov.org

#### WITNESSES:

PO Marc A. Catron , 1125 Locust, Kansas City, MO 64106 DET Chason C. Crowell , 1125 Locust, Kansas City, MO 64106 DET Thomas M Hammond , 1125 Locust, Kansas City, MO 64106 PO Ann Malnar , 1125 Locust, Kansas City, MO 64106 PO Jake W. Prough , 1125 Locust, Kansas City, MO 64106 PO Michael S. Vulje , 1125 Locust, Kansas City, MO 64106 PO Brian J. Wellington , 1125 Locust, Kansas City, MO 64106

#### PROBABLE CAUSE STATEMENT FORM

CRN: 16-47233, 16-47822,

		16-4/823, 16-4/8	33
I, Detective Wellington , Kansas City, (Name and identify law enforcement officer			
knowing that false statements on this for	m are punis	shable by law, state that the facts contained herein are to	rue.
I have probable cause to believe that on			in
	(D	Oate) (Address)	
Kansas City, Jackson County	Missouri	Dallas C. Letchworth	
(County)		(Name of Offender(s))	
W/F, 07/11/1997, 5'03", 115lbs., SSN#		committed one or more criminal offense(s	s).
(Description of Identity	y)		
The facts supporting this belief are as followed	llows:		

On 07/01/2016 Officers of the Kansas City, Missouri Police Department responded to the 7-11 at 11107 Grandview Rd. on a reported Shooting. Upon their arrival they contacted a 42 year old male that stated he was at 63/Paseo Blvd. when he was Robbed, Assaulted, and then held against his will for 2-3 days by three unknown black males. During the assault his keys were taken out of his pocket. The vehicle was found to be missing and was later reported stolen. The victim stated that

no one other than him and his father should have been driving his vehicle.

On 07/04/2016 at approximately 1106 hrs. officers of the Kansas City, Missouri Police Department responded to 3500 Ruysser Rd. and observed a silver in color Chrysler 300 that had been reported stolen. Officers conducted surveillance on the vehicle. At 1117 hrs. a white female was dropped off at the vehicle by a black Dodge Ram, occupied by two white males. The white female, later identified as Dallas C. Letchworth W/F 07/11/1997, entered the stolen Chrysler 300 and drove off northbound on Ruysser Rd. Officers attempted to stop the Chrysler 300 by activating their visual lights and audible sirens at Red Bud Rd. and Grandview Rd. The vehicle failed to stop and officers began pursuing the vehicle northbound on Grandview Rd. at a high rate of speed. Letchworth continued straight without stopping through a 4 way stop onto Prospect Av. Letchworth continued traveling northbound to 85 St. where she made a right hand turn to go eastbound at a red traffic signal without stopping. Letchworth traveled to Hickman Mill Dr. where she made a right turn to go southbound without stopping through a red traffic signal. Letchworth took the entrance to southbound 71 Hwy. where she drove on the right shoulder to pass a vehicle. Letchworth got up to approximately 100 MPH on 71 Hwy, and then cut off two vehicles from the far left lane to the far right exit lane to Bannister Rd. causing a clear and present danger to motorists on the highway. Letchworth did not slow down on the exit ramp and drove through the Red Traffic Signal on Bannister Rd. back onto southbound 71 Hwy. causing motorist to have to avoid getting hit. We continued pursuing Letchworth, at speeds near 100 MPH onto the I-470 eastbound exit ramp. Letchworth got to I-470 Hwy, and made an erratic right turn/swerve perpendicular to the intended flow of traffic on I-470 Hwy, and drove across 3 lanes of traffic and 2 shoulders onto the southbound Red Bridge Rd. exit. As she erratically swerved from I-470 Hwy. to the Red Bridge exit, she struck a motorcycle, sending the driver to the pavement. The driver of the motorcycle was rushed to the hospital, with significant injuries. Letchworth then exited toward Red Bridge Rd. where she attempted to make a right hand turn to travel west, but she was going too fast, lost control, and slid onto the median which disabled her vehicle. Letchworth, who was the sole occupant of the vehicle, exited from the driver seat, and started fleeing on foot into a wooded area, where she was taken into custody. While searching Letchworth incident to arrest, two syringes were located tucked into her bra under her right arm. The syringes were recovered will be submitted for Lab analysis.

Date: 07/04/2016

#### PROBABLE CAUSE STATEMENT FORM

CRN 16-47233, 16-47822, 16-47823, 16-47833

On 07/04/2016 at 1600 hrs. a Detective with the Sex Crimes Unit responded to South Patrol Detention to interview Dallas C. Letchworth regarding this incident. Letchworth was read her Miranda Warning aloud, at which time she stated she understood her rights and stated she was willing to talk. Letchworth signed her Miranda Warning at 1613 hrs. Letchworth stated she had been given the keys to the silver Chrysler by a "tweeker". Letchworth stated she got into the vehicle and drove away when she noticed the police trying to pull her over. Letchworth stated she wasn't going to stop because she had warrants. The Detective asked Letchworth if she could see the police lights and hear the siren. Letchworth stated not at first but she could after a minute. Letchworth stated she shouldn't have tried to run from the police because the car was on empty. Letchworth further stated she continued to try to get away from the police but struck a motorcycle. She continued driving until striking a median which disabled her vehicle. Letchworth stated she tried to flee on foot but was ultimately taken into custody.

Printed Name	Detective Wellington #5539	Signature Det Welsh 5537	
The Court find	s probable cause and directs the iss	uance of a warrant this day of	
		Judge	
	Circuit Court of	County, State of Missouri.	