

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

Police# 16-058931
Prosecutor# 095433970
1616-CR 03001 *P.A.*
OCN# C0051251

COMPLAINT

STATE OF MISSOURI

vs.

John K. Ross
1104 Olive
Kansas City, MO 64127
DOB: 04/12/1962; Race/Sex: B/M;
SS# [REDACTED]
Defendant.

Count I. Assault/attempt Assault 2nd Degree On Law Enforcement Officer, Corrections Officer, Emergency Personnel, Highway Worker, Utility Worker Or Probation And Parole Officer By Means Other Than Deadly Weapon Or Dangerous Instrument/physical Injury (565.082-002Y20051399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.082, RSMo, committed the **Class C Felony of Assault of a law enforcement officer in the second degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about August 11, 2016, in the county of Jackson, State of Missouri, the defendant knowingly caused physical injury to PO [REDACTED], a law enforcement officer, by punching her.

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).

FILED CIRCUIT COURT
JACKSON CO., MO-KC
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THE STATE OF MISSOURI

vs.

John K. Ross

Count II. Assault/attempt Assault 2nd Degree On Law Enforcement Officer, Corrections Officer, Emergency Personnel, Highway Worker, Utility Worker Or Probation And Parole Officer By Means Other Than Deadly Weapon Or Dangerous Instrument/physical Injury (565.082-002Y20051399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.082, RSMo, committed the **Class C Felony of assault of a law enforcement officer in the second degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about August 11, 2016, in the county of Jackson, State of Missouri, the defendant knowingly caused physical injury to PO [REDACTED] a law enforcement officer, by biting her.

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 III. Assault 3rd Degree - Pursuant To Subdivisions (1), (2), (4) And (6) (565.070-002Y20101399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.070, RSMo, committed the **Class A Misdemeanor of Assault in the third degree**, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about August 11, 2016, in the County of Jackson, State of Missouri, the defendant attempted to cause physical injury to [REDACTED] by striking her.

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).

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.

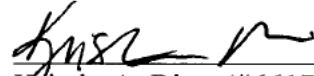
Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

THE STATE OF MISSOURI

vs.

John K. Ross

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,



Kristin A. Ries (#66178)
Assistant Prosecuting Attorney
415 East 12th Street Floor 7M
Kansas City, Missouri 64106
(816) 881-3592
kries2@jacksongov.org

WITNESSES:

PO Sabrina K. Dean , 5301 E. 27th Street, Kansas City, MO 64127
[REDACTED]

DET Mark V. Hammerbacher , 1125 Locust, Kansas City, MO 64106

DET David D. Kisse , 1125 Locust, Kansas City, MO 64106
[REDACTED]

PO Robin R. Reynolds , 1125 Locust, Kansas City, MO 64106

SGT Jonathan P. Rivers , 1125 Locust, Kansas City, MO 64106

PO Abby N. Smith , 1125 Locust, Kansas City, MO 64106
[REDACTED]

DET Sarah M. Throckmorton , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 08-12-2016

CRN: 16-58931

16-59001

I, Detective Sarah Throckmorton #4991, Kansas City Missouri Police Department
(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 08/11/2016, at 11th Street and Prospect Ave
(Date) (Address)

Kansas City, Jackson Missouri [redacted]
(County) (Name of Offender(s))

B/F, 03/06/1976, [redacted] committed one or more criminal offense(s).
(Description of Identity)

Assault on a Law Enforcement Officer

The facts supporting this belief are as follows:

On 08-11-2016 at 1612 hours Officers of the Kansas City, Missouri Police Department were dispatched to 11th Street and Prospect Ave, Kansas City, Jackson County, Missouri on an assist the officer call. Responding Officers contacted the victims, Officers [redacted] and [redacted] who said they were assaulted by Ross and [redacted]

Officer [redacted] stated the following: while working as a two person crew, in police uniforms and in a marked police vehicle she observed Ross punch, head butt and bite [redacted]. Officer [redacted] exited the patrol vehicle to intervene when Ross started punching her in the head and face eight to eleven times with a closed fist. As she and Officer [redacted] got [redacted] and Ross separated, [redacted] lunged forward possibly attempting to hit Ross but she hit Officer [redacted] causing her to be thrown into a metal post box.

Officer [redacted] stated the following: while working as a two person crew, in police uniforms and in a marked police vehicle she observed Ross head butt and punch [redacted]. When she and Officer [redacted] started to intervene, Ross began punching Officer [redacted] in the face and head several times and bit Officer [redacted]s right hand. [redacted] struck Officer [redacted] in the head with a closed fist.

Witness, [redacted] stated the following: he witnessed [redacted] and Ross fighting in the street. When Officer [redacted] exited the police vehicle, Ross attacked her and started punching her.

Officer [redacted] and [redacted] were treated at an area hospital for injuries. Officer [redacted] suffered a concussion. Officer [redacted] complained of feeling nauseous, having a severe headache and ringing in her ears. Officer [redacted] had redness and slight swelling to her right hand from Ross biting her.

[redacted] was arrested and transported to Jackson County Detention Center for questioning. [redacted] was read her Miranda Rights and agreed to speak with detectives. She stated she did not know Ross, he was a stranger. He walked up to her and began assaulting her because he thought she had his "stuff".

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KANSAS CITY, MO
POLICE DEPARTMENT

PROBABLE CAUSE STATEMENT FORM

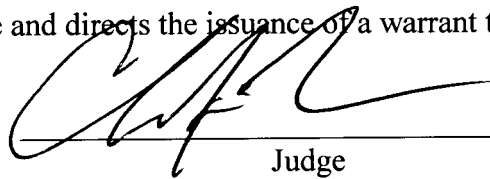
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16-59001

She began physically fighting Ross. Officers arrived and broke the fight up. She did not recall punching Officer [REDACTED] in the head and it was not intentional.

Printed Name Det. Sarah Throckmorton #4991 Signature Det. Sarah Throckmorton #4991

The Court finds probable cause and directs the issuance of a warrant this 12th day of Aug 2016.



Judge

Circuit Court of JACKSON County, State of Missouri.