IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT INDEPENDENCE

Police# 16-007007 Prosecutor# 095434631 1616-CR OCN# ca007258

COMPLAINT

STATE OF MISSOURI

VS.

Leon W. Dawson 1005 SE Talonia Dr. Lees Summit, MO 64081 DOB: 10/16/1969; Race/Sex: W/M; SS#

Defendant.

Count I. Assault 1st Degree - Serious Physical Injury (565.050-001Y19841399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, 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 August 31, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to by stabbing him.

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.

THE STATE OF MISSOURI

VS.

Leon W. Dawson

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 August 31, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count 1, 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.

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,

JoEllen F. Engelbart (#68047) Assistant Prosecuting Attorney 321 W. Lexington Independence, Missouri 64050 (816) 881-4618 jengelbart@jacksongov.org

WITNESSES:

DET Stephen Doogs, 10 NE Tudor, Lee's Summit, MO 64086

PO Michael McClure, 10 NE Tudor, Lee's Summit, MO 64086

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 16-7007

Date:	September	1,	2016
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I, Detective Michael Reese, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

On 08/31/2016 at 1822 hours, Leon Dawson arrived home at his residence located at 1005 SE

- 1. I have probable cause to believe that on 08/31/2016, at 1005 SE Talonia Dr, Lee's Summit, Jackson County Missouri, Leon W. Dawson, W/M, 10/16/1969, Committed one or more criminal offenses.
- 2. The facts supporting this belief are as follows:

Talonia Dr, Lee's Summit, MO. Just prior to arriving home, he had received a phone call from his wife, Ketti Dawson who was already at their residence. Leon was advised by his wife that a neighbor, whom they've had an ongoing feud with, was harassing her with profanity and finger gestures from a vehicle he had just arrived in that continued as he stood outside his residence. Upon Leon's arrival and parking his truck in his driveway, he exited the vehicle, immediately walked behind his truck and along the edge of his property in the street while pointing his finger and yelling toward who was sitting in a wheelchair just off his finger and yelling toward proceeded to exchange words across the street at each other that included them both threatening each other and provoking one another to cross to their side of the street. While Leon remained standing in the street just off the curb, approached him. As they briefly continued to argue face to face in close proximately, applied both his hands to each of Leon's front chest/shoulder area and pushed Leon. They remained in close proximately while both of them continued to grab one another in the upper shoulder/head area. Leon removed a black Smith & Wesson folding knife from his right pocket, opened it, and stabbed in in the left mid groin area near the femoral artery. Upon being stabbed, who stabbed and stabbed him a second time just under the left armpit causing him to fall to the ground. This incident occurred in Lee's Summit, Jackson County, MO.
Detective Reese conducted an interview with Leon Dawson who stated he had received a phone call from his wife that she was being threatened by
Detective Reese conducted an interview with neighbor and witness who stated he had just arrived home at 1009 SE Talonia Dr and observed just off his driveway directly across the street. He said while he and were having a brief conversation about "welding" he observed Leon arrive home in his truck, park in his driveway, jump out and run around his truck. Stated Leon began "yelling" at the "don't ever cuss at my wife again." said who was sitting in a wheel chair got up and told Leon to come across the street and do something about it. Stated Leon yelled back at the told Leon to come over to his side. Said then crossed the street to where Leon was and they were arguing face to face. The advised he told them both to "calm down." as stated he observed the either grab or strike Leon and then observed Leon "punch" in in the stomach. Said after Leon "punched" in the stomach, he observed Leon "slip" something back into his pocket as was backing away with blood running down his leg. Advised fell to the ground and said "you saw that Mike he stabbod me". He said I con then said "you saw Mike, it was self defense."

residence of Leon Dawson with consent from his w prior to Leon's arrival at home, his Ketti was in the occupants of a black vehicle driving by their drivew located a 1620 SE 12 th St and exits the veh	driveway displaying a finger gesture to the way. The vehicle stops at the driveway of the control of the contro
arrive home, exit his vehicle across the street arrive home, exit his vehicle across the street arrives home in his truck, particles and immediately walk around the real front of his residence toward continue to have a verbal exchange as the street is not be a standing in the street toward the southern be a location where they continue to exchange when and pushes Lean back slightly. I observe Lean	riew and believed to have entered her residence while in his driveway. I then observe neighbor, and entered her from and engage in a conversation. The residence was and engage in a conversation. The residence is a conversation of his truck. Leon proceeds to walk in the street in pointing at I observed Leon and I observed Leon and I observed to this driveway and side of his residence. I observe walk to words face to face briefly.
striking him a second time in the upper right side of time, Leon backs away from the least of time, Leon backs away from the least of time, Leon backs away from the least of	ing backwards as Leon continue to engage him and of the backwards. After striking the backwards as econd seen holding his mid section before going to the ent within several feet. The backward appears to speak with an and Ketti stand-by in close proximately as other ately 8-9 inch puncture wound to the left groin area
Det. Michael Reese #0727 Print Name (Detective)	Det M. Rue 0727 Signature (Detective)
THE COURT FINDS PROBABLE CAUSE.	
DATE	JUDGE