

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

POLICE NO. :	17-48603
PROSECUTOR NO. :	095439650

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
LIONEL M. MEADE)	
6202 E. 96th St.,)	CASE NO. 1716-CR
Kansas City, MO - 64134)	DIVISION
DOB: 04/09/1984)	
Race/Sex: B/M;)	
SSN: XXX-XX-7789)	
)	DEFENDANT.

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171201.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the Class A Felony of Robbery in the First Degree, punishable upon conviction under Section 558.011, RSMo, in that on or about May 28, 2017, in the County of Jackson, State of Missouri, the defendant forcibly stole United States currency in the possession of [REDACTED], and in the course thereof defendant was armed with a deadly weapon.

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 28, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery 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 Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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On or about February 19, 2003, in the 16th Circuit Court of Jackson County, Missouri, the defendant was convicted of the offense of Armed Criminal Action, Case Number 16CR02006151-01.

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.

Count III. Unlawful Possession of a Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the Class D Felony of Unlawful Possession of a Firearm, punishable under Sections 558.002 and 558.011, RSMo, in that on or about May 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Marlin/Ballard brown wood and chrome bolt action .22 caliber rifle, a firearm, and on or about February 19, 2003, the defendant was convicted of the Felony offense of Robbery in the First Degree, a Class A Felony, Case Number 16CR02006151-01, in the 16th Circuit Court in Jackson County, Missouri.

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 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 ten thousand dollars (\$10,000); 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.

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Count IV. Resisting or Interfering With Arrest/Detention/Stop (575.150-003Y19104899.)

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 A Misdemeanor of Resisting a Lawful Stop, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 28, 2017, in the County of Jackson, State of Missouri, [REDACTED], a law enforcement officer, was attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, interfered with the stop of defendant by fleeing from the officer on foot.

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 two thousand dollars (\$2,000); 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,

/s/ Luke H. Alsobrook
Luke H. Alsobrook (#66442)
Assistant Prosecuting Attorney
415 E. 12th St., Floor 7M
Kansas City, MO - 64106
(816) 881-3550
lhalsobrook@jacksongov.org

WITNESSES:

[REDACTED]

DET Jennifer A. Blythe, 1125 Locust, Kansas City, MO - 64106
PO Michele R. Cassidy, 1125 Locust, Kansas City, MO - 64106

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PO Joseph A. Chabot, 1125 Locust, Kansas City, MO - 64106

PO Christopher L. Ciarletta, 1125 Locust, Kansas City, MO - 64106

CG, Prosecuting Attorney, 415 E. 12th Street, Kansas City, MO 64106

DET Eric M. Krawchuk, 1125 Locust, Kansas City, MO - 64106

[REDACTED]

DET Paul A. Oxler , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 05/29/2017

CRN: 17-48603

I, Detective Jennifer Blythe #5490, 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 05/28/2017, at 8411 Holmes Road in
(Date) (Address)

Kansas City, Jackson Missouri Lionel M. Meade Jr.
(County) (Name of Offender(s))

B/M DOB: 04-09-1984, SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

- Robbery-1st Degree
Armed Criminal Action
Resist Arrest
Felon in Possession of a Firearm

The facts supporting this belief are as follows:

On 05-28-2017 at 1734 hours, Officers with the Kansas City, Missouri Police Department were dispatched to the Dollar General located at 8411 Holmes Road in regard to an Armed Business Robbery.

Victims and witnesses at the scene reported a black male suspect was wearing a black hooded sweat shirt entered the store armed with a shotgun. The suspect demanded money from the cash register and approximately \$300-\$400 was placed into a yellow Dollar General bag by an employee. The suspect exited the store and was seen entering a white Pontiac Grand Prix driven by an unknown subject.

Within five minutes, Officers conducting an area canvass located a white Pontiac Grand Prix, bearing MO temp tag 01TDUH, at Gregory and Troost Ave. Officers followed the vehicle for several blocks and at Gregory and Prospect Ave a felony car stop was initiated. The driver, Lionel Meade B/M 04/09/1984, exited the vehicle but fled on foot when officers gave him verbal commands to get down on the ground. A short time later, Meade was located and bit by a police K9. Meade was transported to the hospital and treated for a dog bite. Officers observed Meade run out of his shoes during the foot pursuit. After Meade was taken into custody, and escorted out to Prospect by the officers, he asked if I could get his shoes that were still on the sidewalk. The shoes, all black Reeboks with black soles, matched the shoes worn by the suspect in the store's surveillance footage. Additionally, a juvenile female was taken into custody in the right front passenger seat.

During the officers' investigation, a citizen at 7110 Forest Ave advised officers that he observed a vehicle matching the suspect vehicle speed by as he was standing outside. The citizen heard a noise and walked over to the area in which the noise came from to observe a sawed off shotgun and black shirt on the ground. The citizen moved the items away from children that were playing and stood by until police responded. It was later determined that the recovered sawed off shotgun, a Marlin/Ballard brown wood and chrome, bolt action .22 caliber rifle, serial # 17687949, matched the description of the weapon used in the robbery based on victim and witness statements.

Later, detectives conducted formal interviews with victim #1 and victim #2. Victim #1 described Meade as a black male with a dark skin tone, about 5'08" to 5'09" tall, and about 130 lbs and wearing a black hoodie with

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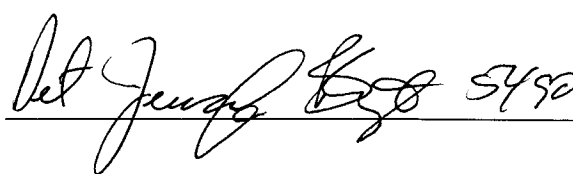
the hood up, blue jeans which were big and a ball cap. Victim #1 also stated that **Meade** had a goatee and unknown markings on his face that could be tattoos. Victim #2 advised that she only saw **Meade** from the side and would not be able to identify him in a photo line-up. Victim #2 described Meade as a black male with a dark skin tone, about 5'01" to 5'04', 150 lbs and wearing a black hoodie and dark sweatpants. Victim #2 thought the suspect vehicle was a silver or gray vehicle with a temporary tag.

Detectives interviewed Meade at Jackson County Detention after he waived his Miranda Rights. Meade denied committing the robbery and stated that he ran from the officers because they had their guns drawn on him. Meade then told detectives that he cut his house arrest bracelet off about twenty minutes before he was pulled over because he was tired of being on house arrest.

Detectives interviewed the juvenile female suspect and after she waived her rights, stated the following: She and **Meade** needed money for food and decided to commit a robbery. They chose the Dollar General for unknown reasons and **Meade** went inside the store while she was the get-a-way driver. Shortly after she and **Meade** left the business, they traded places in the vehicle and **Meade** drove. The juvenile suspect identified the shotgun recovered at 7110 Forest from a photograph shown by the detective as the gun **Meade** used in the robbery.

In 2003, **Meade** was convicted of Robbery-1st Degree and Armed Criminal Action (Jackson County Court Case number CR200206151) resulting in a convicted felon status. Therefore, **Meade** cannot legally possess a firearm.

Printed Name Det. Jennifer Blythe, #5490

Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.