

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

<b>POLICE NO. :</b>	17-049878
<b>PROSECUTOR NO. :</b>	095439764

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>CECIL E. TAYLOR</b>	)	
<b>Homeless, LKA: 800 E. 100th St., Apt. 301</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64131</b>	)	<b>DIVISION</b>
<b>DOB: 02/05/1973</b>	)	
<b>Race/Sex: B/M;</b>	)	
<b>SSN: XXX-XX-XXXX</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Assault - 3rd Degree - Special Victim (565.054-001Y20171312.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the **Class D Felony of Assault in the Third Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 2, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to [REDACTED], a law enforcement officer with the Kansas City Missouri Police Department, and special victim in the performance of his or her official duties, by punching [REDACTED] in the head with the hand of the defenant.

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.

**Count II. Assault - 3rd Degree - Special Victim (565.054-001Y20171312.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the **Class D Felony of Assault in the Third Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 2, 2017, in the County

## State vs. Cecil E. Taylor

of Jackson, State of Missouri, the defendant knowingly caused physical injury to William Finn, a law enforcement officer with the Kansas City Missouri Police Department, and special victim in the performance of his or her official duties, by punching [REDACTED] in the wrist, by striking and kicking [REDACTED] with the hand and foot of the defenant and by struggling with and resisting the arrest of [REDACTED].

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.

### **Count III. Resisting/Interfering With Arrest For a Felony (575.150-001Y20174801.0)**

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 E Felony of Resisting an Arrest**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 2, 2017, in the County of Jackson, State of Missouri, [REDACTED] and [REDACTED], law enforcement officers with the Kansas City Missouri Police Department, were making an arrest of defendant for Felony Assault, and the defendant knew or reasonably should have known that the officers were making an arrest, and, for the purpose of preventing the officers from effecting the arrest, resisted the arrest of defendant by using violence or physical force in that defendant punched [REDACTED] in the head with a closed fist, punched [REDACTED] in the wrist with his fist and attempted to hit and kick [REDACTED] and [REDACTED] multiple times.

The range punishment for a class E 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 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.

### **Count IV. Assault - 3rd Degree (565.054-002Y20171306.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the **Class E Felony of Assault in the Third Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 2, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to [REDACTED] by punching [REDACTED] in the face with the hand of the defendant.

**State vs. Cecil E. Taylor**

The range punishment for a class E 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 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.

**Count V. Property Damage 1st Degree (569.100-001Y20172902.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the **Class E Felony of Property Damage in the First Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 2, 2017, in the County of Jackson, State of Missouri, the defendant knowingly damaged a Samsung cellular telephone at 1500 Paseo, Kansas City, Jackson County, Missouri, which property was owned by [REDACTED], by punching [REDACTED] in the face, causing him to drop the phone and by picking up the phone and throwing the phone down on the concrete, and the damages to such property exceeded seven hundred and fifty dollars.

The range punishment for a class E 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 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.

**Count VI. Trespass - 1st Degree (569.140-001N20165707.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.140, RSMo, committed the **Class B Misdemeanor of Trespass in the First Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 2, 2017, in the County of Jackson, State of Missouri, the defendant knowingly entered and remained unlawfully in a building located at 1500 Paseo, Kansas City, Jackson County, Missouri and possessed by [REDACTED].

The range of punishment for a class B misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed six (6) months; 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.

**State vs. Cecil E. Taylor**

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  
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**WITNESSES:**

PO William S. Finn, 1125 Locust, Kansas City, MO - 64106

DET Blake E. Groves, 1125 Locust, Kansas City, MO - 64106

PO Lance W. Lenz, 1125 Locust, Kansas City, MO - 64106

PO Chad E. Pfaff , 1125 Locust, Kansas City, MO - 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 06-02-2017

CRN: 17-049878  
17-049866

I, Detective Blake Groves #5271 of the 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 06-02-2017, at I-70 and Paseo in  
(Date) (Address)

Kansas City, Jackson Missouri Cecil E. Taylor  
(County) (Name of Offender(s))

B/M 02-05-1973; SSN: [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

- RSMO 575.150: Resisting Arrest
- RSMO 565.054: Assault 3rd Degree x1
- RSMO 565.054: Assault 3rd Degree (of a special victim) x2
- RSMO 569.100: Property Damage 1st Degree
- RSMO 569.140: Trespass 1st Degree

The facts supporting this belief are as follows:

On 06-02-2017 at approximately 0932 hours, officers with the Kansas City, Missouri Police Department were dispatched to the BP station at 1500 Paseo regarding an outside disturbance.

When they arrived, they contacted the clerk who was using a towel to soak up blood from his lip. When he removed the towel, there was a visible laceration to his lip which required medical attention. The clerk stated that a male who he'd had multiple issues with had come back on the property despite being told not to return. When the clerk told the suspect to leave again, the suspect punched him. The punch caused the clerk to drop his \$850 Samsung phone. Upon seeing this, the suspect picked the phone up, looked at it, and threw it down on the concrete, causing it to shatter. He then fled on foot.

The clerk was transported to an area hospital for treatment for a black eye and a lacerated lip where he was given 5 stitches to his upper lip.

The responding officers conducted an area canvass for the suspect and a witness pointed him out at the westbound off-ramp from I-70 to Paseo. When VOD1 attempted to take him into custody, the suspect immediately punched VOD1 in the left side of his head with a closed fist. While VOD1 attempted to create distance between him and the suspect, he attempted to deploy his Oleoresin Capsicum (OC), but the can got turned around and sprayed VOD1 directly in the right eye. VOD1 got the can turned around and deployed the OC to the suspect who temporarily paused before he continued charging toward VOD1 and trying to punch him again. VOD2 attempted to deploy his Taser to subdue the suspect, but the 1<sup>st</sup> cartridge had no effect. Instead, the suspect punched VOD2 in the wrist he was holding the Taser with before going after VOD1 again. VOD2 deployed a 2<sup>nd</sup> Taser cartridge which caused the suspect to fall to the ground, but it did not stop him from fighting. He continued to hit and kick at the officers while they attempted to get him into custody. They were eventually able to place him in handcuffs at 0955 hours.

VOD1 sustained swelling to the left side of his head, scratches to his arm, bruising to his hand, a sore right knee, tightness in his jaw, and pain with redness to his right eye where he was sprayed with the OC. VOD2 sustained swelling to his left arm near his wrist where the suspect hit him.

**PROBABLE CAUSE STATEMENT FORM**

CRN 17-049878


17-049866

On 06-02-2017 at approximately 2250 hours, a Crime Scene Technician with the Kansas City, Missouri Police Department responded to the hospital where the suspect was admitted. She took right thumb and index prints from him and turned them over to the Fingerprint Identification Section. On 06-03-2017 at approximately 0908 hours, the reporting detective received a call from the Fingerprint Identification Section who advised that the suspect's fingerprints came back to **Cecil E. Taylor B/M 02-05-1973; SSN: [REDACTED]**.

A computer inquiry of **Taylor** showed him to have a prior conviction on 10-30-2008 for 1<sup>st</sup> Degree Assault on Law Enforcement. It also showed an active warrant for Resisting Arrest.

Printed Name Detective Blake Groves #5271

Signature

 5271

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.