

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

POLICE NO. :	17-027481
PROSECUTOR NO. :	095440139

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
TRENTON L. STANLEY)	
3700 N. Walrond Ave.,)	CASE NO. 1716-CR
Kansas City, MO - 64127)	DIVISION
DOB: 06/06/1989)	
Race/Sex: W/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840909.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the **Class C Felony of Involuntary Manslaughter in the First Degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 17, 2017, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Krealonna M. Willis by operating a motor vehicle in the improper lane of traffic and causing a vehicular collision.

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 three (3) years and not to exceed ten (10) years; 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. 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 April 17, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Involuntary Manslaughter in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Involuntary Manslaughter 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 range of punishment for the offense of Armed Criminal Action in violation of section

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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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Brady X. Twenter
Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
415 East 12th Street 11th Floor
Kansas City, MO - 64106
BTwenter@jacksongov.org

WITNESSES:

DET Gary L. Burgess, 1125 Locust, Kansas City, MO - 64106
PO Timothy L. Fillpot, 1125 Locust, Kansas City, MO - 64106
PO Aaron M. Kohrs, 1125 Locust, Kansas City, MO - 64106
DET Kevin D. Richardson, 1125 Locust, Kansas City, MO - 64106
Billy Smith, Prosecuting Atty. Office, Kansas City, MO - 64106
PO Michael S. Vulje, 1125 Locust, Kansas City, MO - 64106

 **PROBABLE CAUSE STATEMENT FORM** 

Date: 06/21/2017

CRN: 17-027481

I, Det. Gary Burgess #4441

(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 04/17/2017, at Gardner Avenue and N. Chouteau Trafficway in
(Date) (Address)
Kansas City, Jackson Missouri, Trenton L Stanley W/M 06/06/1989
(County) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

Fatality Vehicular

The facts supporting this belief are as follows:

On 04/17/2017 at 1000 hours, Kansas City, Missouri Police Officers responded to Gardner Avenue and N.Chouteau Trafficway, Kansas City, Jackson County, Missouri in regard to a fatal crash involving two motor vehicles. A black 2002 Ford Mustang bearing Missouri license plate FL0N7B, which was being operated by Trenton L Stanley, (W/M, 06/06/1989), and a red 2003 Saturn L300 bearing Kansas license plate 825JXH, which was being operated by Krealonna M Willis (B/F, 05/13/1993), were traveling south on N.Chouteau Trafficway. The two vehicles sideswiped eachother and the Saturn lost control and struck the concrete barrier then flipped numerous times before coming to stop. The driver of the Saturn, Krealonna Willis, was pronounced dead at the scene.

A witness stated both vehicles were southbound on N. Chouteau Trafficway, south of Gardner Avenue and the Ford was driving south in the northbound lanes. The witness had to take evasive action by changing lanes, to avoid a collision with the Ford. The Ford then swerved back into the southbound lanes of N. Chouteau Trafficway and struck the Saturn. The impact caused the Saturn to strike the outside lane cement wall and then flipped multiple times.

While at the scene a Kansas City Missouri Detective read Mr. Stanley his Miranda Rights, and he advised he understood his rights and signed the Miranda Waiver. Stanley stated on 04-17-2017 sometime after 0930 hours, he was driving south on N. Chouteau Trafficway, near 210 Highway, when he observed a maroon Saturn weaving in and out of traffic. As Stanley passed the Saturn, the black female driver, Willis, swerved towards him in a manner that he felt like she was trying to "take him out". Willis was yelling profanities at Stanley so he yelled back at her then turned his music up. Stanley passed Willis and stayed even with another motorist in the next lane to prevent Willis from passing him. As Stanley approached the green light at Gardner Avenue, he sped up to about 40-50 mph and he thought he was a good distance ahead of Willis, but as he crested the hill on N. Chouteau, south of Gardner Avenue, he saw Willis next to him in the #2 lane. Stanley then took his phone out and was going to video Willis and he could tell she was still yelling at him. After he pointed his phone at Willis he yelled, "I got you now". Willis then moved over into his lane (#1 lane) so he moved into the #1 northbound lane of Chouteau to avoid a collision. Stanley tried to pass Willis and as he was doing so, Willis sideswiped his car. After Stanley regained control of his car he could see the Saturn in his rear view mirror and it was also losing control and then it flipped over numerous times. Stanley drove south a short distance then he stopped and returned back to the crash to offer assistance. Stanley called 911 and tried to open the doors of the Saturn and speak to Willis to check on her condition, but he didn't get a response.

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Accident Investigation Section Officers conducted an investigation of the collision. The officers determined Willis was traveling 70 MPH in the inside (#1 lane) and Stanley drove alongside her at or near the same speed in the #1 northbound lane of travel. Stanley then struck the left side of Willis's vehicle and caused her to lose control, strike the concrete wall and then overturn and she died as a result.

Stanley consented to a blood draw after the accident and the toxicology report revealed a positive response for marijuana. The medical examiner report revealed Willis also had marijuana in her system at the time of the accident. A computer check revealed Stanley to have a valid Missouri driver's license.

Printed Name Det. Gary Burgess #4441 Signature Det. Gary Burgess #4441

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

Judge

Circuit Court of _____ County, State of Missouri.