

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

POLICE NO. :	17-061704
PROSECUTOR NO. :	095440364

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
	)	
vs.	)	
JASON EVANS	)	
734 Osage St., Apt. #4,	)	CASE NO. 1716-CR
Leavenworth, KS - 66048	)	DIVISION
DOB: 08/10/1996	)	
Race/Sex: B/M;	)	
SSN: XXX-XX-████	)	
DEFENDANT.	)	

COMPLAINT

Count I. DWI – Habitual Offender – Death of a Non-Passenger (577.010-021Y20175404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.010, committed the **Class B of Driving while Intoxicated**, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about July 13, 2017, E. 75th St. and Paseo Blvd., in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by failing to maintain the proper lane of traffic and failing to obey a traffic control device and as a result caused the death of Stephen Russell and Stephen Russell was not a passenger in the vehicle operated by the defendant.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) 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.

State vs. Jason Evans

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Brady X. Twenter

Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
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WITNESSES:

Sharod Benton, Prosecuting Atty. Office, Kansas City, MO - 64106
PO Marc A. Catron, 1125 Locust, Kansas City, MO - 64106
PO Shantasa D. Fischer, 1125 Locust, Kansas City, MO - 64106
PO James R. Oakes, 1125 Locust, Kansas City, MO - 64106
DET Kevin D. Richardson, 1125 Locust, Kansas City, MO - 64106
DET Chad M. Rives, 1125 Locust, Kansas City, MO - 64106
PO Steven R. Weber, 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07-14-2017

CRN: 17-061704

I, **Det. K. Richardson #4290**

(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 07-13-2017, at E. 75th Street & Paseo Boulevard in
(Date) (Address)
Kansas City, Jackson Missouri, Jason T. Evans B/M 08-10-1996
(County) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

Vehicular Manslaughter

The facts supporting this belief are as follows:

On 7-13-2017 at approximately 2306 hours, Kansas City Missouri Police Officers were dispatched to the area of E. 75th Street and Paseo Boulevard, Kansas City, Jackson County, Missouri on a reported injury crash.

Upon arrival, the officers located a crash involving a white Chevrolet Impala and maroon Chevrolet Pickup. EMS responded and located the driver of the Chevrolet Impala, identified as JASON T. EVANS, B/M 8-10-1996. EVANS was transported to Research Medical Center for treatment. The driver of the maroon Chevrolet Pickup, was identified as Stephen Russell W/M 4-14-1949. Russell was also transported to Research Medical Center for treatment. Russell was pronounced dead shortly after his arrival at the hospital. Accident Investigation Officers responded to the crash scene and determined the white Chevrolet Impala was traveling northbound in the southbound lanes of Paseo Boulevard at a high rate of speed. At E. 75th Street the white Chevrolet Impala, driven by EVANS, struck the maroon Chevrolet Pickup that was traveling eastbound through the intersection.

Officer Smeiska of the DUI Section responded to Research Medical Center and contacted EVANS. Members of the ER staff advised Officer Smeiska that EVANS was combative when he arrived at the hospital and he had an odor of an alcoholic beverage about him. A search warrant was obtained to determine the level of impairment of EVANS. A search warrant was also obtained to search the interior and exterior of EVANS vehicle at the time of the crash.

A computer check of EVANS revealed him to be valid through Kansas DOR.

Printed Name Det. K. Richardson #4290

Signature

[Handwritten Signature] #4290

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

Judge

Circuit Court of _____ County, State of Missouri.