

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

Police# 17-061214
Prosecutor# 095440327
1716-CR03020
OCN# B2109304

AMENDED COMPLAINT

STATE OF MISSOURI

vs.

**Kaveon C. Cottonham
12005 Smalley Ave.
Grandview, MO 64030
DOB: 02/08/1998; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840999.0)

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 July 12, 2017, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of A.S. (D.O.B: 12/20/07) by operating a motor vehicle at an excessive rate of speed and failing to obey a traffic control device.

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.

STATE OF MISSOURI

vs.

Kaveon C. Cottonham

Count II. Assault - 2nd Degree (565.052-001Y20171399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 12, 2017, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED] by operating a motor vehicle at an excessive rate of speed and failing to obey a traffic control device.

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. Assault - 2nd Degree (565.052-001Y20171399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 12, 2017, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED] by operating a motor vehicle at an excessive rate of speed and failing to obey a traffic control device.

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 IV. Assault - 2nd Degree (565.052-001Y20171399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 12, 2017, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED] by operating a motor vehicle at an excessive rate of speed and failing to obey a traffic control device.

STATE OF MISSOURI

vs.

Kaveon C. Cottonham

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 V. Leaving Scene Of Accident - Physical Injury (577.060-001Y20175401.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 577.060, RSMo, committed the **class E felony of leaving the scene of an accident**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 12, 2017, the defendant, while operating a motor vehicle on E. 51st St. and Woodland Ave., in the County of Jackson, State of Missouri, was involved in an accident that resulted in physical injury to A.S., and the defendant knew that such accident had occurred, and defendant left the location of the accident without stopping and giving defendant's name, residential address, license number of defendant's vehicle, and operator's license number to the other party in the accident, a law enforcement officer in the vicinity, or to the nearest law enforcement agency.

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.

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.

THE STATE OF MISSOURI

vs.

Kaveon C. Cottonham

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, Missouri 64106
BTwenter@jacksongov.org

WITNESSES:

DET Gary L. Burgess, 1125 Locust, Kansas City, MO 64106

[REDACTED]

DET Christopher G. Hayes, 1125 Locust, Kansas City, MO 64106

SGT Joshua A. Heinen, 1125 Locust, Kansas City, MO 64106

[REDACTED]

PO Robert A. Martin, 1125 Locust, Kansas City, MO 64106

DET Chad M. Rives, 1125 Locust, Kansas City, MO 64106

[REDACTED]

[REDACTED]

PO John F. Vidal, 1125 Locust, Kansas City, MO 64106

[REDACTED]

AMENDED PROBABLE CAUSE STATEMENT FORM

Date: 07/17/2017

CRN: 17-061214

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 E. 51st Street and Woodland Avenue
(Date) (Address)
Kansas City, Jackson Missouri, Kaveon C. Cottonham B/M 02/08/1998
(County) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

Vehicular Assault/Leaving Scene of Accident/No Operator's License

The facts supporting this belief are as follows:

On 07/12/2017 at approximately 1327 hours, a Kansas City Missouri Police Officer was operating his marked police vehicle with the emergency equipment activated while in route to a call for service. When the officer approached 55th Street and Woodland Avenue, Kansas City, Jackson County, Missouri, he observed a gray 2006 Pontiac Grand Prix, bearing Missouri license plate PP5-J6Z, stopped on Woodland Avenue blocking the roadway. The officer turned north onto Woodland Avenue and as he attempted to pass the Pontiac it accelerated and pulled ahead of the officer at a high rate of speed northbound out of the officer's sight. The officer arrived at his call for service and as he exited his patrol car a citizen notified him there was an accident to the north of his location. The officer responded to 51st and Woodland and observed the same gray Pontiac had collided with a white, 2007 Hyundai Sonata bearing Missouri license plate KP8-N7U, which had been traveling east on 51st Street. The driver/defendant of the Pontiac later identified as **Kaveon C. Cottonham (b/m, 02/08/1998)**, then got out of the Pontiac and fled the scene on foot and was taken into custody southeast of the accident scene. The occupants of the Hyundai, [REDACTED], [REDACTED], and [REDACTED] were transported to area hospitals with serious injuries and **A.S. (b/m, 12/20/2007)**, who was seated in the rear passenger location suffered life threatening injuries.

A witness, [REDACTED], **b/f, 03/05/1988**, stated she was the front passenger of the Pontiac and when the defendant (**Kaveon C. Cottonham**), observed the police car behind them with the lights and sirens activated he panicked because he thought the police were attempting to pull them over. The witness asked the defendant to pull over but he sped up to about 75-85 MPH to get away from the officer. As the defendant approached the four way stop at 51st and Woodland Avenue he entered the intersection and struck the white Hyundai which was traveling east bound on 51st Street. The defendant then got out of the Pontiac and ran in a southeast direction. A third passenger (rear seat) in the Pontiac, who also fled from the crash scene was apprehended and identified as [REDACTED], **b/m, 10/10/1996**.

A witness, [REDACTED], **b/f, 11/20/1959**, stated she heard a crash then observed two black males, both armed with guns, run from the Pontiac southeast from the crash site.

PROBABLE CAUSE STATEMENT FORM

CRN 17-061214

Kansas City Missouri Detectives read the defendant his Miranda Rights and he advised he understood his rights and signed the waiver. The defendant denied being involved in an accident then requested an attorney.

A computer check revealed the defendant to not have a valid driver's license.

On 07/14/2017 at 0942 hours, A.S. (b/m, 12/20/2007) died as a result of the injuries he sustained in the crash.

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.