

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

POLICE NO. :	17-066096
PROSECUTOR NO. :	095440579

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
	)	
vs.	)	
TERRY M. JONES II	)	
5724 Ash Ave.,	)	CASE NO. 1716-CR
Raytown, MO - 64133	)	DIVISION
DOB: 01/20/1983	)	
Race/Sex: W/M;	)	
SSN: XXX-XX-XXXX	)	
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 Felony of Driving While Intoxicated**, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about July 26, 2017, I-435 and Oldham Rd., 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 as a result caused the death of Hawa A. Mohamud, who 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. Terry M. Jones II

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:

DET Kurtis J. Anderson, 1125 Locust, Kansas City, MO - 64106
Joseph M. Field-Farias, Prosecuting Atty. Office, Kansas City, MO - 64106
Nicholas J. Gittemeier, Prosecuting Atty. Office, Kansas City, MO - 64106
Jeremy D Green, Prosecuting Atty. Office, Kansas City, MO - 64106
Alexandria K. Hall, Prosecuting Atty. Office, Kansas City, MO - 64106
PO Karl T. Janning, 1125 Locust, Kansas City, MO - 64106
India M. Johnson, Prosecuting Atty. Office, Kansas City, MO - 64106
Parker G. Kane, Prosecuting Atty. Office, Kansas City, MO - 64106
PO Jamie D. Lamb, 1125 Locust, Kansas City, MO - 64106
PO Douglas H Mc Connell, 1125 Locust, Kansas City, MO - 64106
Keenan McKenzie, Prosecuting Atty. Office, Kansas City, MO - 64106
Richard Milone, Prosecuting Atty. Office, Kansas City, MO - 64106
PO Jacquelynn R. Mutschler, 1125 Locust, Kansas City, MO - 64106
Natalie L. Purnell, Prosecuting Atty. Office, Kansas City, MO - 64106
DET Kevin D. Richardson, 1125 Locust, Kansas City, MO - 64106
PO Kori L. Smeiska, 1125 Locust, Kansas City, MO - 64106
April M. Sohayda-Walters, Prosecuting Atty. Office, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 07/27/2017

CRN: 17-066096

I, **Det. Kurtis Anderson #5019**

(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 07/26/2017, at I-435 Highway and Oldham Rd.

(Date)

(Address)

In Kansas City Jackson Missouri TERRY M. JONES

W/M 01/20/1983

(County)

(Name of Offender(s))

(Description of Identity)

committed one or more criminal offense(s).

Manslaughter

The facts supporting this belief are as follows:

On 07/26/2017, at 2155 hours, Kansas City, Missouri Police Officers were in the area of I-435 Highway and Oldham Rd., Kansas City, Jackson County, Missouri when they came upon a multi-vehicle collision. The Officers determined a maroon Dodge Ram, bearing Missouri license plate UM8N0Z, was traveling northbound on I-435 at a suspected high rate of speed, lost control, crossed over the center median and barrier cables and entered into the southbound lanes of travel. Upon entering the southbound lanes of travel, the Dodge became involved in a collision with a total of 8 other vehicles. The Dodge came to rest upon striking a gray Honda Accord, bearing Missouri license plate AH8V7M, which was being operated by Hawa A. Mohamud. Ms. Mohamud suffered life threatening injuries as a result of the crash and was pronounced dead on the scene. The defendant and driver of the Dodge (**TERRY M. JONES, W/M, 01/20/1983**) identified himself as the driver of the Dodge to the responding officer and remained at the scene.

Kansas City, Missouri Police Detectives identified and interviewed multiple witnesses at the scene. All witnesses reported the Dodge crossed from the northbound lanes to the southbound lanes and landed on the Honda.

A DUI Officer responded to the scene and contacted the defendant. The Officer observed a strong odor of an alcoholic beverage coming from the defendant's breath. The defendant's eyes were observed to be glassy and his speech was observed to be mumbling. The defendant's balance was observed to be swaying. The DUI Officer administered the Standardized Field Sobriety Tests. The Officer observed 6 out of 6 clues during the Horizontal Gaze Nystagmus Test, 5 out of 8 clues during the Walk and Turn Test, and 2 out of 4 clues during the One Leg Stand Test. The defendant was transported to an area hospital where he was read Missouri Implied Consent and refused to submit to a chemical test of his blood. PO Smeiska applied for and obtained a Search Warrant out of Jackson County Missouri for the defendant's blood. The blood was recovered and submitted to the lab for analysis.

Kansas City, Missouri Police Detectives advised the defendant of his Miranda Rights. The defendant declined to be interviewed without an attorney.

Accident Investigation Section Officers conducted an investigation of the collision. The officer determined the defendant was traveling northbound on I-435 at a high rate of speed. The defendant left the roadway to the left and drove through the cable barriers. The defendant struck multiple southbound vehicles and landed on top of the Honda. The driver of the Honda was pronounced dead at the scene.

A computer check revealed the defendant to have a valid operator's license through Missouri Department of Revenue.

On or about 02/01/2007, the defendant was convicted of misdemeanor DWI, in the Circuit Court of Jackson County, Missouri, in case # 060342272, for events that occurred on 11/13/2006.

Printed Name Det. Kurtis Anderson #5019

Signature

Det. Kurtis Anderson #5019

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

Judge

Circuit Court of _____ County, State of Missouri.