

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	17-006169
PROSECUTOR NO. :	095440643

STATE OF MISSOURI,
PLAINTIFF,
vs.
JAMES B SHADE
721 NE Tudor Rd.,
Lee'S Summit, MO - 64086
DOB: 03/28/1972
Race/Sex: W/M;
SSN: XXX-XX-XXXX
DEFENDANT.

COMPLAINT

Count I. Unlawful Use Of Weapon - Subsection 9 - Shoot At/from Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20145213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B Felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 28, 2017, at 721 NE Tudor apartment number 3, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a habitable structure: apartment number 1 of 721 Tudor, Lee's Summit, Missouri.

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.

Count II. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the class E felony of unlawful use of a weapon, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a shotgun, a weapon readily capable of lethal use, in an angry or threatening manner.

State vs. James B Shade

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.

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/ Michael J. Hunt

Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

DET Chad Albin , 10 NE Tudor, Lee's Summit, MO - 64086
SGT Tanya Blevins , 10 NE Tudor, Lee's Summit, MO - 64086
PO Chloe Crowdes , Prosecuting Atty. Office, Kansas City, MO - 64106
PO Chris Drake , 10 NE Tudor, Lee's Summit, MO - 64086

[REDACTED]

PO Michael Heady , 10 NE Tudor, Lee's Summit, MO - 64086
PO Michael Isberg , 10 NE Tudor, Lee's Summit, MO - 64086
PO Kent Miller , 10 NE Tudor, Lee's Summit, MO - 64086
PO Erica Osborn , 10 NE Tudor, Lee's Summit, MO - 64086
PO Jeff Short , 10 NE Tudor, Lee's Summit, MO - 64086

STATEMENT OF PROBABLE CAUSE

Lee's Summit Police Department Case File: 1 17 006169

Date: 31 July 2017

I, Detective C. Albin, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that on 28 July 2017, at 721 Northeast Tudor Road, Lee's Summit, Jackson County, Missouri 64086, the suspect, James B. Shade [white, male, SSN 4 [REDACTED], DOB: 28 March 1972, 45 years old] committed one or more criminal offenses.

The facts supporting this belief are as follows:

On Friday, 28 July 2017 Lee's Summit Police Officers were dispatched to 721 Northeast Tudor Road, Apartment 3, Lee's Summit, Jackson County, Missouri to investigate a male that was threatening to commit suicide. The male had called a suicide crisis hotline and threatened to use a firearm to commit suicide.

While officers were responding to the above listed address the Lee's Summit Police Department Communications Unit informed officers, via the police radio, that the reporting party was calling from the National Veterans Crisis Hotline. The reporting party stated that he answered a hotline phone call from a male that identified himself as James Shade (suspect). James Shade was having "suicidal thoughts" and had a plan to "shoot" himself. The reporting party told James Shade that he was going to call the police. James Shade replied, "I will shoot anyone that shows up." The reporting party was also able to confirm with the Communications Unit that James Shade was armed with a "gun".

Patrol Sergeant T. Blevins arrived on scene and attempted to contact the suspect, James Shade, by telephone. The suspect never answered the telephone.

As officers arrived at the residence and began to approach apartment numbered three, Officer M. Heady observed the suspect open the front door of apartment numbered three. When the suspect opened the door. Officer M. Heady began providing verbal commands to the suspect. When the suspect recognized Officer M. Heady as a police officer he slammed the door shut. Approximately thirty seconds later, the suspect fired one round from inside his apartment, a 12 gauge shot gun slug traveled through the front door of his apartment and in the direction of Officer M. Heady. The round continued to go through the front door of apartment numbered one which was across the hallway. It was later determined that the round that entered apartment numbered one traveled through multiple walls, doors, and a window, and eventually exited the apartment on the west side of the building crossing the parking lot and striking a second building.

The suspect then exited his apartment with a shotgun pointed underneath his jaw. Officers told the suspect to put down the shotgun multiple times. The suspect told the officers he was not going to put down the shotgun.

An Officer then shot the suspect with less lethal munitions in an attempt to get him to comply with their orders and to drop the shotgun. An Officer continued to shoot the suspect with the less lethal munitions four more times. In between the impacts of the less lethal munitions the suspect yelled, "Do you think that will stop me!"

The suspect began moving towards an officer, multiple officers shot the suspect before the suspect could hurt the police officer or an incident by stander.

The suspect collapsed on the north end of the breezeway in building numbered 721. The suspect was taken in custody as part of this ongoing assault investigation. On his person officers discovered a shotgun that was loaded with one slug round and four rounds of "Critical Defense 00 Buck".

The suspect was transported to the hospital and was still being treated at the time of this application.

Master Police Officer M. Isberg contacted the suspect's brother who received a text message on his mobile phone from James Shade. The message was sent from James Shade's mobile phone to his brother. Master Police Officer M. Isberg observed the text message himself and photographed the text message as it was displayed on the mobile phone. The message stated, "Hey Brother I'm sorry.. suicide by cop is my best option. I have \$450,000 on Life Insurance. Please delegate between my boys.. Nick and Jake are going to receive Social Security benefits until they're 18. But give Tyler everything he wants and needs for his education".

On 7 April 2017, Lee's Summit Police Officer responded to James Shade's apartment to investigate James Shade threatening suicide. James Shade had been sending text messages to family members threatening suicide. Officers made contact with James Shade and were allowed inside his apartment. The officers observed a loaded "lever action rifle" and a "loaded single shot shotgun" inside the apartment. James Shade voluntarily went to the Veteran's Administration Hospital for treatment. When they arrived at the emergency room James Shade told the intake nurse that he had previously received treatment for "suicidal ideations".

31 July 2017

Date



Signature of Detective C. Albin, Badge #9919

THE COURT FINDS PROBABLE CAUSE.

Date

Judge