

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-055545
PROSECUTOR NO. :	095440694

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
CARL-DAKOTA A. YOUNG	)	
1712 N. Emery St.,	)	CASE NO. 1716-CR
Independence, MO - 64050	)	DIVISION
DOB: 11/13/1992	)	
Race/Sex: W/M;	)	
SSN: XXX-XX-XXXX	)	
DEFENDANT.	)	

COMPLAINT

Count I. Dwi - Habitual (577.010-019Y20175404.0)

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 558.002, 558.011 and 577.010 RSMo, in that on or about August 5, 2017, Truman Rd. Near Baker Dr. in the County of Jackson, State of Missouri, the defendant, while driving while intoxicated, acted with criminal negligence by driving into oncoming traffic and colliding with another vehicle, which caused the death of Patrice N. Lee, a person not a passenger in the vehicle operated by defendant.

Defendant is a habitual offender and shall not be eligible for parole until eighty-five percent of the sentence is served, and is required to serve a minimum of two years before being eligible for probation or parole.

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.

State vs. Carl-Dakota A. Young

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/ Hallie L. Williams

Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
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WITNESSES:

[REDACTED]
[REDACTED]
[REDACTED]

PO Kenneth Gibson , 223 N. Memorial Drive, Independence, MO - 64050

PO Glen Harder , 223 N. Memorial Drive, Independence, MO - 64050

PO Todd Hargis , 223 N. Memorial Drive, Independence, MO - 64050

Patricia N. Lee , 807 S. Arlington, Independence, MO - 64055

PO Dustin Rapp , 223 N. Memorial Drive, Independence, MO - 64050

[REDACTED]

[REDACTED] le [REDACTED] , [REDACTED]

PO Brett Schmidli , 223 N. Memorial Drive, Independence, MO - 64050

PROBABLE CAUSE STATEMENT

Date: 08/06/2017

Report: 17-55545

I, **Detective Todd Hargis**, knowing that false statements on this form are punishable by law, state that the facts contained herein are true:

1. I have probable cause to believe that on **08/05/2017, Truman RD and Baker Drive, Carl-Dakota A. Young, W/M, 11-13-92, 1712 N. Emery ST, Independence, MO, 64050, [REDACTED]** committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

OCN: **AN016116**

On 08-05-2017 at approximately 0435 hours Independence Missouri Police dispatch was notified of an injury traffic collision which occurred at approximately 0434 hours at Truman RD and Baker Drive. Independence Missouri Police Officer Dustin Rapp was the first officer on scene at 0436 hours.

Officer Rapp made contact with the suspect vehicle driver, Carl-Dakota A. Young, who was sitting on the curb in front of a red, 2014, Chevrolet, Silverado with MO license 0360VN. The suspect stated he was the only occupant of the vehicle. The suspect spontaneously stated he had fallen asleep while driving and struck the other vehicle head-on. He added he had been drinking.

Independence Missouri Police Officer Ken Gibson was called in at 0511 hours to investigate the fatality traffic collision. Officer Gibson investigation showed the Chevrolet driven by the suspect was west bound on Truman RD of west Baker Drive. The Chevrolet crossed over the double yellow center lane line into the west bound inside lane of Truman RD west of Baker Drive. The victim vehicle, (blue, 2004, Ford, Focus with MO license KM5-S0T) was east bound in the inside lane when it was struck by the Chevrolet. The victim vehicle was driven by Patrice N. Lee who died as a result of her injuries.

The suspect was transported to Centerpoint Hospital by ambulance. Officer Richard Remington followed the ambulance to the hospital and maintained a watch over the suspect in the emergency room. Independence Missouri Police Officer Jeff Buck was called in at approximately 0528 hours to conduct the DWI investigation of the suspect. Officer Buck met with the suspect at the hospital at approximately 0611 hours.

Officer Buck introduced himself and asked the suspect what was going on. The suspect stated, "Well been drinking tonight and was on my way home and I ended up crashing,

well fell asleep and ended up crashing into someone.” Officer Buck stated he could smell the strong odor of an intoxicating on the suspect’s breath. Officer Buck observed the suspect’s eyes were extremely bloodshot and glassy. Officer Buck asked the suspect if he had sustained a head injury. The suspect stated he had not sustained a head injury. Officer Buck administered the HGN test to the suspect as he was lying in the hospital bed. The suspect showed no smooth pursuit in both eyes and distinct and sustained Nystagmus at maximum deviation in both eyes. Officer Buck was not able to administer the other tests due to the suspect being attached to several monitors.

Officer Buck based on the suspect’s physical signs of impairment and the impairment clues on the HGN test placed the suspect under arrest for DWI and read to him the Missouri Implied consent. Officer Buck requested chemical samples of the suspect’s blood. The suspect consented to the blood tests.

Centerpoint RN Trysten Dial completed blood draws on the suspect at 0635 hours and 0715 hours. The third blood was completed by RN Leslie Failer at 0754 hours. Officer Buck recovered all the blood draw samples and placed them on police property as evidence.

Independence Missouri Police Officer Glen Harder on 08-05-2017 at approximately 1010 hours conducted a suspect interview in the videotaped interview room in the detective unit of the Independence Missouri Police Department. Officer Harder read to the suspect his Miranda warning of rights from a warning of rights form. Officer Harder allowed the suspect to read the form. The suspect acknowledged he understood his rights by signing the waiver of rights form.

Officer Harder completed the interview section from the alcohol influence report. The suspect stated he was involved in a traffic collision around 400 or 430am on Truman RD. He said he was driving at the time of the traffic collision. He said he was injured in the collision where he broke his right wrist, had a cut above his left eye and had a sore left knee. The suspect stated he did not consume any intoxicating beverages after the traffic collision.

The suspect stated he was drinking at Whiskey Tango in Grain Valley. He said he had 5 or 6 Jack Daniels and Coke. He said his fourth drink was at 8pm and he stopped drinking at 1am. The suspect stated he had not used Marijuana or any other drugs.

The suspect stated he was driving his friend’s truck because he felt in he was in much better shape to drive. The suspect stated he drove his friend to the friend’s mother residence in Bates City. The suspect stated he did not want to stay at his friend’s house and felt he was good to drive. The suspect stated he knew he had struck another vehicle because he got out and checked on the other driver. He said he told by someone at the vehicle to go stay by his vehicle. He stated he sat on the curb, called his parents and told them he had been drinking and had been in a wreck. Officer Harder photographed the suspect’s injuries and concluded the interview.

The suspect had a valid driver's license at the time of the traffic fatality. The suspect has no prior alcohol contacts.

Todd W. Hargis

Print Name

Detective Todd W. Hargis

Independence MO Police

/s/ Todd W. Hargis

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge