

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	17-009003
PROSECUTOR NO. :	095442161

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
ALEX M. LATTA)	
1616 SW Summit Hill Court,)	CASE NO. 1716-CR
Lees Summit, MO - 64081)	DIVISION
DOB: 02/18/1996)	
Race/Sex: W/M;)	
SSN: XXX-XX-5257)	
)	DEFENDANT.

COMPLAINT

Count I. Assault 1st Degree Or Attempt (565.050-002Y19791399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the class B felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about October 28, 2017, in the County of Jackson, State of Missouri, the defendant shot at a motor vehicle being operated by [REDACTED], and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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. Armed Criminal Action (571.015-001Y19755213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about October 28, 2017, in the County of Jackson, State of

State vs. Alex M. Latta

Missouri, the defendant committed the felony of assault in the first degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count III. 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 October 28, 2017, at NW Murray Rd, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm from a Chevrolet Silverado, a motor vehicle.

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 IV. Armed Criminal Action (571.015-001Y19755299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about October 28, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of [name of felony] charged in Count 3, all

State vs. Alex M. Latta

allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of [name of felony] by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count V. Unlawful Possession, Transport, Manufacture, Repair Or Sale Of Illegal Weapon (571.020-001Y20175203.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.020.1, RSMo, committed the class D felony of unlawful possession of a weapon, punishable upon conviction under Sections 558.011 and (558.002), RSMo, in that on or about October 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed a short barreled shotgun.

The range of 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 VI. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo,

State vs. Alex M. Latta

committed the class D felony of unlawful possession of a firearm, punishable under Sections 558.002 and 558.011, RSMo, in that on or about October 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Glock 23 .40 S&W caliber, a firearm, and was convicted in Jackson County of the class C felony of unlawful possession of a firearm on July 22, 2016. The defendant pleaded guilty in 1516-CR04617-01, and received a three year suspended sentence.

The range of 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 VII. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the class D felony of unlawful possession of a firearm, punishable under Sections 558.002 and 558.011, RSMo, in that on or about October 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Verona 12 guage shotgun with a sawed off 15 5/8" barrel, a firearm, and was convicted in Jackson County of the class C felony of unlawful possession of a firearm on July 22, 2016. The defendant pleaded guilty in 1516-CR04617-01, and received a three year suspended sentence.

The range of 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 IX. Possession Of Controlled Substance Except 35 Grams Or Less Of Marijuana/synthetic Cannabinoid (579.015-001Y20173562.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.015, RSMo, committed the class D felony of possession of a controlled substance, punishable upon conviction under Section(s) 558.002 (and 558.011), RSMo, in that on or about October 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed

State vs. Alex M. Latta

marijuana, a controlled substance, knowing of its presence and nature, and the amount of marijuana was more than 35 grams.

The range of 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 X. Unlawful Use Of Weapon - Subsection 11 - Possess Weapon And A Felony Controlled Substance (571.030-019Y20175299.0)

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 under Sections 558.002 and 558.011, RSMo, in that on or about October 28, 2017, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Verona 12 gauge shotgun with a sawed off 15-5/8" barrel, a firearm, while also possessing more than 35 grams of marijuana, a controlled substance, knowing of its presence and nature.

The range of 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Brady X. Twenter

State vs. Alex M. Latta

Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
415 East 12th Street 11th Floor
Kansas City, MO - 64106
BTwenter@jacksongov.org

WITNESSES:

[REDACTED] 3

[REDACTED]

[REDACTED]

[REDACTED]

SGT Aaron Evans , 10 NE Tudor, Lee's Summit, MO - 64086

PO Christy Griffin , 10 NE Tudor, Lee's Summit, MO - 64086

DET Aaron Ide , 10 NE Tudor, Lee's Summit, MO - 64086

SGT Scott Liles , 10 NE Tudor, Lees Summit, MO - 64086

[REDACTED]

[REDACTED]

[REDACTED] 052

Statement of Probable Cause

LSPD Complaint: 17-9003

Date: 10-29-17

I, Detective S. Cole, Badge #1012, an investigator with the Lee's Summit Missouri Department of Police, knowing that false statements herein are punishable by law, and that the facts herein are true, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe on or about 10-28-17; at SW Murray Rd. and SW 1st St. in Lee's Summit, Jackson County, Missouri 64064, **Alex M. Latta, WM, 02/18/1996,** [REDACTED], committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 10/28/17 at approximately 1600 hours, officers were dispatched on a rollover crash near NW Murray Rd and NW Obrien Rd. Officers arrived and observed a 2003 Chevrolet Silverado resting on its roof in the grass off of the roadway near the intersection of NW Murray Rd and NW Obrien Rd. The driver of the pickup, DEF-Alex Latta, and its passenger, DEF-[REDACTED] [REDACTED], were contacted outside of the vehicle where they had exited the pickup. Both DEF-Latta and DEF-[REDACTED] were treated at the scene by EMS personnel and then transported to Research Medical Center for treatment. Multiple items from inside of the pickup were strewn about the grass around the pickup truck where they were ejected out of the vehicle during the crash.

The following items were recovered:

- Verona 12 gauge shotgun with a sawed off 15 5/8" barrel, loaded with three 12 gauge shells (in grass around the truck)
- Black backpack (in grass around the truck) that contained
 - a plastic bag containing 190.5 g of green leafy substance that tested positive for THC with a presumptive test kit
 - Wax paper containing 10.8 g of a waxy substance that tested positive for THC with a presumptive test kit
 - A digital scale with green residue
 - Plastic Food Saver bags
- Two loaded Glock 40 magazines (in grass around the truck)
- A plastic bag containing 113.4 g of green leafy substance that tested positive for THC with a presumptive test kit (inside of truck resting on the roof interior)
- A plastic bag containing 45.8 g of green leafy substance that tested positive for THC with a presumptive test kit (inside of truck resting on the roof interior)
- Glock 23 .40 S&W caliber handgun containing a loaded magazine (inside of truck resting on the roof interior)
- Spent 12 gauge shell (in the grass around the truck)
- Spent .40 S&W case (in the grass around the truck)

A computer check of DEF-Alex Latta revealed that he had Felony convictions for:

- Possession of Firearm (case #1516CR0461701)
- Unlawful Use of Weapon (case #1516CR0461701)
- Possession of Controlled Substance (case #1516CR0194301)

This incident occurred within the City Limits of Lee's Summit, Jackson County Missouri.

The Victims were interviewed and said the following:

██████████ was driving his 1999 Toyota Avalon with his wife, ██████████ ██████████ in the front passenger seat. Their two children, ██████████ (13 months) and ██████████ ██████████ (27 months), were in their respective car seats in the back seat of the vehicle. They drove West on SW 3rd St but then turned into the east entrance of The Oaks Apartments (1403 SW 3rd St) to turn around. A black pickup truck driven by an unknown white male, later identified as Alex Latta, accompanied with an unknown white male passenger, later identified as ██████████ ██████████, followed their sedan from the apartment parking lot back to the entrance and bumped the rear of the sedan with the front of the pickup truck. The truck then drove around the sedan, out of the apartment parking lot and west onto SW 3rd St. ██████████ drove the sedan after the truck and began to follow the truck in an attempt to get the truck to stop to exchange information for the vehicle contact in the parking lot. The pickup truck stopped behind traffic at the stop sign located at SW 3rd St and SW Murray Rd. The truck then turned north on SW Murray Rd and accelerated in an attempt to get away from ██████████ in the sedan. ██████████ followed after the truck and then accelerated into the designated turn lane and began to drive parallel with the truck. ██████████ began to yell for the driver of the truck to "pull over". The driver of the truck then pointed a black handgun at ██████████'s sedan and fired one round which struck Daniel's front passenger tire. The front passenger side of ██████████'s vehicle then briefly collided with the driver side of the pickup truck. The pickup truck then began to weave erratically as it passed through the intersection located at NW Murray Rd and NW Obrien Rd. The truck failed to regain control and began to flip as it left the roadway. ██████████ turned away from the pickup truck on NW Murray Rd onto NW Obrien Rd. ██████████ then realized that the front passenger tire of his vehicle was flat. ██████████ turned around and parked the sedan and informed police of the incident when they arrived. ██████████ and ██████████ stated that they want to prosecute for the Assault.

Defendant ██████████ was interviewed and said the following:

He has known Alex Latta for approximately 7 years. He was aware that Alex owned a shotgun and a handgun and that Alex kept the weapons inside of his pickup truck. ██████████ has purchased Marijuana from Alex in the past. On 10/28/17 at around 1 pm, Alex drove his pickup truck from his Lee's Summit home to ██████████ Raytown home to pick ██████████ up to hang out. Alex drove ██████████ to the Oak Park mall to meet some people and then later drove ██████████ to the apartment complex in Lee's Summit. A short time after arriving at the apartment complex a car driven by a 40 year old white male who was accompanied by a female with children in the back seat arrived in the parking lot complex and parked a couple of parking spaces down from Alex's truck. The male exited the sedan and approached the driver side of Alex's pickup

truck and spoke with Alex. A disagreement between Alex and the male ensued. Alex took a plastic bag of marijuana from the male and then shoved it underneath [REDACTED]'s front passenger seat. Alex then drove his pickup away from the man and his sedan and out of the apartment complex. [REDACTED] was not sure but he believed that Alex and the man disagreed over the price of the Marijuana and that Alex may have took the Marijuana without paying for it. Alex then drove west from the apartment complex onto SW 3rd St and then north onto SW Murray Rd. The man entered his sedan with the female and children and began to follow Alex and [REDACTED] at a high rate of speed. When the man drove his sedan next to Alex's truck, Alex reached between the driver seats and grabbed his handgun. Alex then fired one bullet at the man's car. The man then rammed Alex's truck with his car and Alex lost control of his truck which left the road and began to flip. [REDACTED] did not know who the man or woman was but he believed that Alex may have dealt with them in the past. [REDACTED] stated that Alex only used and fired the handgun once and that Alex did not use or fire the shotgun.

Defendant Alex Latta was interviewed and stated the following:

Alex was driving his friend [REDACTED] [REDACTED] in Alex's pickup truck along SW 3rd St. After passing a gas station a car began to quickly follow Alex in his pickup truck. Alex was concerned that it was people who were out to kill him due to him testifying against someone in the past. The person driving the car later rammed Alex's truck which caused him to lose control and crash. When questioned about the weapons, Alex requested an attorney and the interview was immediately concluded.

Detective S. Cole #1012
Lee's Summit Police Department

/s/ Det. S. Cole #1012
Signature