

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-009595
PROSECUTOR NO. :	095442477

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
RICHARD S. CONNELLY)	
405 A. Hawthorne St.,)	CASE NO. 1716-CR
Independence, MO - 64058)	DIVISION
DOB: 11/07/1987)	
Race/Sex: W/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y19841310.0)**

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 A felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about November 17, 2017, in the County of Jackson, State of Missouri, the defendant attempted to cause serious physical injury to Police Officer [REDACTED] by pointing a gun at him, and in the course thereof, Police Officer [REDACTED] was a special victim as defined by Section 565.002.

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 A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment. The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

State vs. Richard S. Connely

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 November 17, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree, 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.

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/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050

State vs. Richard S. Connely

(816) 881-4488

hwilliams@jacksongov.org

WITNESSES:

DET Chad Albin , 10 NE Tudor, Lee's Summit, MO - 64086

[REDACTED]

DET Kevin Dibben , 10 NE Tudor, Lee's Summit, MO - 64086

PO John Easley , 10 NE Tudor, Lee's Summit, MO - 64086

PO Eric Faler , 10 NE Tudor, Lee's Summit, MO - 64086

PO Andrew Jones , 10 NE Tudor, Lee's Summit, MO - 64086

PO Brian Kelly , 10 NE Tudor, Lee's Summit, MO - 64086

SGT Clayton O'Donnell , 10 NE Tudor, Lee's Summit, MO - 64086

[REDACTED]

PO James Treacy , 10 NE Tudor, Lee's Summit, MO - 64086

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 17-9595

Date: November 17th, 2017

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

1. I have probable cause to believe that on 11/17/2017 at 3 NE O'Brien Rd., Lee's Summit, Jackson County Missouri, Richard S. Connely, W/M, 11/07/1987, ██████████ committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 11-17-17, ██████████ was dispatched to 3 NW O'Brien Rd. in regard to a car prowler. Dispatch advised the subject as a tall bald white male with a flashlight. CMS advised the subject had left the area in an unknown direction in a silver 4 door sedan.

Upon arrival, ██████████ observed a silver Ford Focus (PR8S0N) near the main entrance parking in a parking spot with its lights on. ██████████ stopped his patrol vehicle and contacted the driver, who he described as a white male, early to mid 30's, bald, medium build, some facial hair, wearing a dark colored shirt, dark pants and a yellow reflective vest. ██████████ also observed a black flashlight between his legs. ██████████ asked the driver where he lived and the driver responded, close by. ██████████ then asked if he lived in the apartment complex and the driver responded again it was close by. ██████████ asked the driver for identification. The driver began to look around and placed his vehicle into reverse. The driver turned his vehicle around and began pulling out of the parking lot onto NW O'Brien Rd., traveling on NW O'Brien Rd. without any headlights

██████████ positioned his patrol vehicle behind the Ford Focus in an attempt to deploy a Star Chase round. Both attempts were unsuccessful. ██████████ then activated his patrol vehicle's in an attempt to stop the vehicle. The vehicle driver rolled down the window and pointed, what appeared to be an AR style rifle with a scope attached, at ██████████. ██████████ immediately turned into the nearest parking lot for cover, fearing for his life.

After the vehicle was a safe distance from ██████████ patrol vehicle, he began to follow the vehicle. ██████████ began a pursuit with the Ford Focus. While pursuing the vehicle, the driver slowed to approximately 25 MPH and again, pointed the AR rifle out the window at pursuing officers. During the pursuit, the driver also threw a long gun, long gun case, bullet proof vest, badge out the window and a bag of an unknown white substance on Longview Rd.. ██████████ also stated other items were thrown out the window during the pursuit.

The pursuit eventually ended in Grandview, Missouri where the Ford Focus drove through the grass of an apartment complex, down a small hill and crashed through a fence. Due to the fence blocking his path, ██████████ disregarded the pursuit. He noticed the Ford Focus drive down another hill, onto a different roadway, where it continued with its lights off.

PO Kelley later recovered a Remington 870 shotgun on the shoulder of SW Longview Rd., which is where ██████████ stated a long gun was thrown out the window.

Sgt. O'Donnell recovered the bullet proof vest, which had the words "State Trooper" stitched on the back. At the conclusion of the pursuit, Sgt. O'Donnell noticed the name "Nate Bradley" printed on a label inside the vest. Sgt. O'Donnell recognized the name from previous police contacts as an employee of the Missouri State Highway Patrol.

PO Faler later recovered the badge, which was a Kansas City Police Department badge.

The vehicle was later found abandoned in Grandview, MO at 155th Ter. and Fuller St. PO Easley located a AR style rifle, in plain view, sitting between the passenger and passenger door.

The registered owner of the Ford Focus was later determined as Dauncy Smith, 510 SW Pacific Dr., Belton, MO. Dauncy was later determined to be a black male. Contact was made with Dauncy by telephone by Det. Dibben. Dauncy told Det. Dibben that an acquaintance of his named Rich Connely, took his vehicle without his permission.

Det. Dibben and Det. Treacy were aware of Rich Connely from an on-going property damage case in Lee's Summit.

Det. Dibben showed ██████████ a booking photo of Richard Connely, 11/07/1987, from the Kansas City Police Department, which was taken in September, 2017. ██████████ positively identified the driver of the Ford Focus as ██████████.

Det. James Treacy #0708
Print Name (Detective)

/s/ James R. Treacy #0708
Signature (Detective)