

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	18-003221
PROSECUTOR NO. :	095443265

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
ISAIAH D. JACKSON)	
3707 Bales Ave.,)	CASE NO. 1816-CR
Kansas City, MO - 64127)	DIVISION
DOB: 05/24/1991)	
Race/Sex: B/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 January 13, 2018, in the County of Jackson, State of Missouri, the defendant shot into a vehicle occupied by [REDACTED], and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED] a law enforcement officer, 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 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.

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

State vs. Isaiah D. Jackson

Section 571.015.1, RSMo, in that on or about January 13, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the first degree charged in Count I, 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 deadly weapon.

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. 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 January 13, 2018, in the County of Jackson, State of Missouri, the defendant shot into a vehicle operated by [REDACTED], and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], a law enforcement officer, 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 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. Isaiah D. Jackson

Count IV. 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 January 13, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the first degree charged in Count III, 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 deadly weapon.

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 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 January 13, 2018, at Blue Parkway and Cleveland Ave., in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a blue Ford Explorer, 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.

State vs. Isaiah D. Jackson

Count VI. 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 January 13, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count V , all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon by, with and through, the knowing use, assistance and aid of a deadly weapon.

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/ Kristin A. Ries
Kristin A. Ries (#66178)
Assistant Prosecuting Attorney
415 East 12th Street Floor 7M
Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 1-13-18

CRN: 18-003221

I, Detective Austin Reiter #5707
(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 1-13-18, at Blue Parkway and Kensington in
(Date) (Address)

Kansas City, Jackson Missouri Isaiah D. Jackson
(County) (Name of Offender(s))

B/M 05-24-91, SSN# [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 1-13-18 at approximately 2313 hours, officers of the Kansas City Missouri Police Department were on patrol in the area of **Blue Parkway and Cleveland, Kansas City, Jackson County, Missouri**. They were in a marked patrol vehicle #190, with police written on the side of the vehicle and a visible light bar on top. The vehicle was driven by a Sergeant with the Kansas City Police Department (VIC2) and in the front seat passenger was another Sergeant (VIC1) with the police department.

Detectives interviewed VIC1 who was riding in the passenger seat of vehicle 190, while VIC2 was driving. As they were traveling east on Blue Parkway approaching Kensington, he heard two loud gunshots just before the rear passenger window of his patrol vehicle broke out. VIC1 said he immediately felt something hit the back of his head and thought he had been shot. He saw a maroon SUV drive past them and continue eastbound on Blue Parkway at a high rate of speed. They activated their emergency equipment and VIC2 pursued the suspect vehicle for about 2 minutes until it pulled over on Blue Parkway. The suspect, **Isaiah D. Jackson B/M 5-24-91** exited the SUV and was taken into custody. JACKSON was the only occupant of the vehicle. VIC1 also said when he heard the shots he did not observe any other vehicles or pedestrians on the south side of the street beside the suspect vehicle VIC1 suffered a small laceration to the back of his head.

Detectives interviewed VIC2, who said he was driving police vehicle 190 eastbound on Blue Parkway just east of Cleveland, with VIC1 in the passenger seat. VIC2 heard what sounded like a loud gunshot as the right rear window of the vehicle broke out. VIC2 said the suspect vehicle immediately drive past them from the right side and continued east on Blue Parkway. VIC2 activated his emergency equipment and pursued the vehicle until it pulled over about two minutes later. **JACKSON** exited the driver side of the vehicle and was taken into custody. VIC2 said he never lost sight of the vehicle and the only occupant was **JACKSON**.

A black handgun magazine was located in **JACKSON'S** jacket pocket. It was loaded with 10 live rounds of Federal S&W 40 caliber ammunition.

PROBABLE CAUSE STATEMENT FORM


CRN 18-003221

Upon review of the VIC1 and VIC2's dash cam video the driver side window of the suspect's vehicle can clearly be seen rolled down as it travels past them at a high rate of speed.

Investigation revealed glass fragments in the street in the area of Blue Parkway and Cleveland. Two spent shell casings were located in the street in the area of Blue Parkway and Cleveland. The head stamp on both shell casings was FED 40 S&W. A Glock model 23 .40 caliber handgun, serial # PXF044, was located in the driver's floor board of the suspect vehicle. It contained a magazine with 10 live rounds of ammunition and one live round of ammunition in the chamber. The round in the chamber of the handgun was head stamped FED 40 S&W. Patrol Vehicle #190 had a broken right rear window. There was an apparent bullet hole in the right rear door and a metal jacket from a spent bullet was located in the right rear seat.

On 01/14/2018 at 1010 hours, JACKSON was transported to the 6th floor of police headquarter where he was placed in an interview room. At 1033 hours, JACKSON was read aloud his Miranda waiver which he signed and agreed to speak with Detectives. JACKSON admitted to driving in the area of Blue Parkway/Cleveland in his mother's Maroon 1999 Mercedes SUV at the time of the incident. JACKSON also admitted to owning the Glock 23 .40 Cal and being in possession of it while he was traveling alone in the SUV. At first JACKSON denied the Glock was loaded with any ammunition and said he had not fired it in 2 years. Later in the interview JACKSON changed his story and said he had fired the Glock in the air about 5 minutes before passing a marked police vehicle in the area of Blue Parkway/Cleveland.

Upon review of KCMO city cameras in the area, Detectives observed police vehicle 190 travel east through the intersection of Blue Parkway and Cleveland. The suspect vehicle travels east through the same intersection behind the police vehicle at a high rate of speed. The suspect vehicle slows to approximately the same rate of speed as the police vehicle and pulls up next to it. The suspect's vehicle's brake light comes on just before the brake lights of the police vehicle are visible. The suspect vehicle then drives quickly in front of the police vehicle, swerves over almost striking it. It should be noted that no other vehicles or pedestrians can be seen on the south side of the vehicle 190 at the time of the shooting, beside the suspect vehicle.

Printed Name Detective Austin Reiter #5707 Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.