

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

POLICE NO. :	18-004572
PROSECUTOR NO. :	095444242
OCN:	HS001317

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 SAMNANG DUONG)
)
 11317 E. Peery St.) CASE NO. 1816-CR
)
 Independence, MO 64054) DIVISION
)
 DOB: 12/30/1977)
)
 Race/Sex: A/M)
)
)
)
)
 DEFENDANT.)

COMPLAINT

Count I. Terrorist Threat - 1st Degree (574.115-004Y20171602.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 574.115, RSMo, committed the **class D felony of making a terroristic threat in the first degree**, punishable upon conviction under Section 558.011 and 560.011, RSMo., in that on or about January 19, 2018, in the County of Jackson, State of Missouri, the defendant, with the purpose of frightening ten or more people or causing the evacuation, quarantine or closure of any portion of a building, inhabitable structure, place of assembly or facility of transportation, knowingly communicated an express or implied threat to cause an incident or condition involving danger to life, in that he told the Principal of Whittier Elementary and two other individuals at the school that he would shoot them and that he would shoot the whole school up.

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.

State vs. Samnang Duong

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/ P. Benjamin Cox
P. Benjamin Cox (#60757)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, MO 64106
(816) 881-3975
BCox@jacksongov.org

WITNESSES:

[REDACTED]

[REDACTED]

[REDACTED]

DET Austin M. Reiter, 1125 Locust, Kansas City, MO 64106

Whittier Elementary School, 1012 Bales Ave., Kansas City, MO 64127

PROBABLE CAUSE STATEMENT FORM

Date: 03/08/2018

CRN: 18-4572

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 01/19/2018, at 1012 Bales in
(Date) (Address)

Kansas City, Jackson Missouri Samnang Duong
(County) (Name of Offender(s))

WM, 12/30/1977 committed one or more criminal offense(s).
(Description of Identity)

Making a Terrorist Threat

The facts supporting this belief are as follows:

On 01/19/2018 at 1226 hours, officers were dispatched to Whittier Elementary School, located at **1012 Bales Ave, Kansas City, Jackson County, MO** in regard to a suspicious party.

Upon their arrival they contacted VIC2 who advised that a step parent of student, **Samnang DUONG, WM, 12/30/1977** had threatened to shoot several staff members and the entire school.

Detectives interviewed VIC2 who said on 01/19/2018 she was in a meeting along with VIC3 and VIC4. **DUONG** arrived and demanded to know who called DFS in regard to an incident involving his step-son. **DUONG** then said he going to shoot VIC2, VIC3 and VIC4. **DUONG** then said, "I'll shoot the whole school up." VIC2 identified **DUONG** from a single DOR photo.

Detectives interviewed VIC3 who stated on 01/19/2018, she was in a meeting along with VIC2 and VIC4 at Whittier Elementary when **DUONG** arrived and began shouting profanities at the three of them. **DUONG** then said, "If I find out who hot lined my family, I will come up to the school shooting." He then continues and said he didn't care about going to jail and to, "Check my history." VIC3 positively identified **DUONG** from a 6 person photo lineup.

Detectives interviewed VIC4 who said she was in a meeting on 01/19/2018 along with **DUONG**, VIC2 and VIC3. VIC4 said **DUONG** became angry about an incident regarding his step son and started cursing. **DUONG** then threatened that if he found out who called DFS he would shoot them. He then, specifically threatened, her (VIC4) and VIC2 and VIC3 by saying, "I'll shoot you" to each of them.

On 03/08/2018 at 0910 hours, **DUONG** was arrested on a felony stop order in regard to this case. **DUONG** was transported to the 6th floor of police headquarters where at 0914 hours; he was read his Miranda waiver and agreed to speak with Detectives. **DUONG** spoke about several incident involving Whittier Elementary which he did not feel were handled properly. **DUONG** said he was at the school on 01/19/2018 in a meeting along with

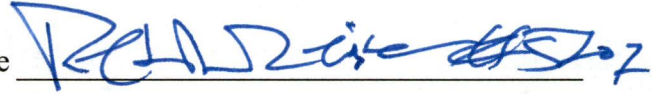
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VIC2, VIC3 and VIC4. **DUONG** admits that he was upset in the meeting but denies threatening to, "Shoot up the school," VIC2, VIC3 or VIC4.

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.