

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	18-000820
PROSECUTOR NO. :	095446592
OCN:	hospitalized

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MATTHEW W. HEPTING)	
18413 E. Arrowhead Lane)	CASE NO. 1816-CR
Independence, MO 64056)	DIVISION
DOB: 09/15/1993)	
Race/Sex: W/M)	
<div style="background-color: black; width: 150px; height: 15px;"></div>)	
)	DEFENDANT.

COMPLAINT

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840909.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the **class C felony of involuntary manslaughter in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 7, 2018, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Juanita H. Hanna by operating his vehicle in excess of the posted speed limit and failing to maintain control of his vehicle.

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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 II. Dwi - Serious Physical Injury (577.010-027Y20175404.0)

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 D felony of driving while intoxicated**, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about February 7, 2018,

State vs. Matthew W. Hepting

at or near Blue Mills and Buckner-Tarsney Road, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of drugs, and acted with criminal negligence by driving in excess of the speed limit and as a result caused serious physical injury to Jamilea M. Brisbin.

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 III. Dwi - Serious Physical Injury (577.010-027Y20175404.0)

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 D felony of driving while intoxicated**, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about February 7, 2018, at or near Blue Mills and Buckner-Tarsney Road, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of drugs, and acted with criminal negligence by driving in excess of the speed limit and as a result caused serious physical injury to Clarissa L. Tripp.

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.

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,

State vs. Matthew W. Hepting

/s/ Michael J. Hunt

Michael J. Hunt (#34818)

Assistant Prosecuting Attorney

321 W. Lexington

Independence, MO 64050

(816) 881-3856

mhunt@jacksongov.org

WITNESSES:

1. PO Ron Baltzer, 223 N. Memorial Drive, Independence, MO 64050
2. Jamilea M. Brisbin, 211 Hudson, Buckner, MO 64016
3. Tracy Cederstrom, 108 Osage, Buckner, MO 64016
4. DEP Scott Collins, 3310 NE Rennau, Lees Summit, MO 64064
5. Mary Edwards, 3310 NE Rennau Drive, Lees Summit, MO 64064
6. Juanita H. Hanna,
7. DEP Ray Heck, 3310 NE Rennau Drive, Lees Summit, MO 64064
8. Christopher Hein, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
9. DEP Jessica Hill, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
10. DEP Lauren Michael, 3310 NE Rennau, Lees Summit, MO 64064
11. Clarissa L. Tripp, 417 Hocker Ave., Independence, MO 64056
12. PO Christopher Walker, 223 N. Memorial Drive, Independence, MO 64050

STATEMENT OF PROBABLE CAUSE

DATE: 7/9/2018

JCSO CASE NO.: Probable Cause Statement.doc

I, Detective Jessica N. Hill #79, of the Jackson County, Missouri Sheriff's Office, 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 02-07-2018, at the intersection of Blue Mills Rd and Buckner Tarsney, Buckner, Missouri, which is inside the boundaries of Jackson County, Missouri, Matthew W. Hepting, W/M, 09-15-1993, [REDACTED], last known address: 18413 Arrowhead Lane, Independence, MO, committed one or more criminal offense(s).

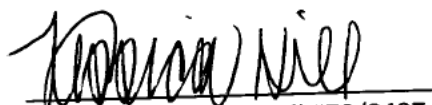
2. The facts supporting this belief are as follows:

On 02-07-2018, at approximately 0041 hours, Deputy Hein was dispatched to Blue Mills and Buckner Tarsney Rd, Buckner, MO in reference to an automobile crash with injuries. Deputy Hein reported, upon his arrival he observed a black in color Pontiac G6, bearing Missouri license YK5L1K, with extensive damage, and four (4) injured occupants. The two rear passengers in the vehicle, Jamilea M. S. Brisbin W/F 11-18-1997 and Clarissa L. Tripp W/F 10-30-1991, were transported by EMS to Centerpoint Medical Center for injuries sustained in the crash. The front passenger, Juanita H. Hanna W/F 04-09-1996, was declared deceased by EMS on scene, and the driver, Matthew W. Hepting W/M 09-15-1993 was life-flighted to Research Medical Center for injuries sustained.

Brisbin and Tripp provided recorded interviews in regard to the crash. Both parties stated Hepting was driving and Hanna was in the front passenger seat when they were picked up in the above described vehicle. They advised Brisbin was behind Hepting and Tripp was behind Hanna. Brisbin and Tripp advised they were traveling north on Buckner Tarsney when Hepting and Hanna began to argue because Hanna thought Hepting was flirting with Tripp. During their argument Tripp advised Hepting hit Hanna in the face with the back of his hand. Hepting then turned up the radio and began to drive at excessive speeds. Brisbin advised during her interview she observed the speedometer to be over 100mph. Tripp said she heard Hanna tell Hepting to slow down, and at that time both Tripp and Brisbin advised they observed Hepting again hit Hanna in the face with the back of his hand. Brisbin advised she observed Hepting travel into an embankment and at that time closed her eyes. Brisbin advised she was admitted into Centerpoint Medical Center from 02-07-2018 through 02-15-2018. Brisbin said she suffered a broken right femur, which required surgery, and her lower back was broken, at the D12, L1, and L2 vertebrae. Tripp said she suffered a broken right femur and knee, eight (8) broken ribs, a broken tail bone, and stitches to her right foot, shin, and lip.

The Jackson County Medical Examiner's report stated the cause of death is Blunt Force Trauma in the manner of a traffic crash. The toxicology report for Hepting, from Truman Medical Center West, from 02-07-2018, after being admitted on his injuries, revealed his blood showed a positive presence of Amphetamines, Benzodiazepines, and Cannabinoids.

Independence Police Department, Officer Baltzer, assisted with the crash reconstruction, which revealed, the posted speed limit on the roadway was 50mph. A recommended speed limit of 45mph sign was also present. There was nothing observed with the roadway that could have been a contributing factor. The vehicle slid 278 feet off the roadway and struck a large tree. The damage observed on the vehicle from the impact with the tree was consistent with damage seen at crash scenes at freeway speeds. The vehicle traveled another 107 feet before coming to a stop. The speedometer was stopped at 82mph, which was consistent with the amount of damage observed on the vehicle. Due to the overwhelming information and observations speed is a large factor in the causality of the crash.



Detective Jessica N. Hill #79/0407
Jackson County, MO Sheriff's Office