

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

POLICE NO. :	19-023380
PROSECUTOR NO. :	095451837
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
NAQUITA D WILLIAMS)	
4412 NE Sunnybrook Ln)	CASE NO. 1916-CR
Kansas City, MO 64117)	DIVISION
DOB: 02/04/1985)	
Race/Sex: B/F)	
[REDACTED])	
	DEFENDANT.)

COMPLAINT

Count I. Dwi - Death Of Another Not A Passenger (577.010-033Y20175404.0)

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 B felony of driving while intoxicated – resulting in death**, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about April 1, 2019, E 87th St and I-435 in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by not maintaining the proper lane of traffic and as a result caused death to Danzel Campbell, and Danzel Campbell was not a passenger in the vehicle operated by the defendant.

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.

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.

State vs. Naquita D Williams

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Brady X. Twenter
Brady X. Twenter (#49380)
Assistant Prosecuting Attorney
1315 Locust, 1st Floor
Kansas City, MO 64106
BTwenter@jacksongov.org

WITNESSES:

1. Danzel M Campbell, Pros. Atty. Off., 415 E 12th St, Floor 11, Kansas City, MO 64106
2. PO Dustin Dykstra, 1125 Locust, Kansas City, MO 64106
3. [REDACTED] . Atty. Off., 415 E 12th St, Floor 11, Kansas City, MO 64106
4. PO Jordan P. Infranca, 1125 Locust, Kansas City, MO 64106
5. [REDACTED]
6. PO Aaron M. Kohrs, 1125 Locust, Kansas City, MO 64106
7. [REDACTED]
8. PO Lawrence R. Pollard, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 04/01/2019

CRN: 19-023380

I, Det. Lawrence Pollard #5044

(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 04/01/2019, at E. 87th St and I-435 in

Kansas City, Jackson Missouri, NAQUITA D WILLIAMS B/F 02/04/1985

(County)

(Name of Offender(s))

(Description of Identity)

committed one or more criminal offense(s).

Fatality

The facts supporting this belief are as follows:

On 04/01/2019 at 0145 hours, Kansas City, Missouri Police Officers responded to E. 87th St. and I-435 in, Kansas City, Jackson County, Missouri, to investigate a serious injury crash. Upon arrival it was determined a maroon, 2003 Cadillac Escalade, bearing Missouri license, VB5R2S, had been involved in a crash with a black, 2011 Ford Fusion bearing Missouri temporary tag 044MT3. The driver of the Ford Fusion died as a result of their injuries.

Members of the Kansas City Missouri Police Department Accident Investigation Section took control of the scene and conducted an investigation. Investigators determined the Cadillac Escalade, being driven by Naquita D Williams (b/f 02/04/1985) was traveling southbound in the northbound lanes of travel on I-435 when it collided head on with the Ford Fusion.

Williams was transported to an area hospital for medical treatment. Officers J. Infranca and N. Magers of the DUI Section made contact with Williams. Officers detected an odor of intoxicants and observed her eyes to be watery, bloodshot and glassy. William's speech was slurred, confused and stuttering. Officer Infranca administered the Horizontal Gaze Nystagmus Test and observed adequate clues indicating impairment. The remaining 2 SFSTs were not administered due to medical treatment. Williams was advised of Missouri Implied Consent and refused to submit to a chemical test of her blood. A search warrant was sought and obtained by a Jackson County Circuit Court Judge. Four gray top vials of blood were drawn pursuant to the search warrant. The blood was released to Children's Mercy toxicology Lab for analysis. The results are pending.

Witness Brooklyn Johnson stated she was southbound on I-435 near Gregory Blvd. She observed a red SUV traveling southbound in the northbound lanes of travel. Johnson observed a vehicle take evasive action to avoid the SUV. Johnson called 911 to report the wrong way driver. While on the phone with 911, Johnson witnessed the red SUV strike the black Ford Fusion head on.

Witness Adam Pearce stated he observed an SUV "blacked out" sitting in the middle of the highway. He observed flames coming from the SUV and ran up to assist. He observed a female inside the cab of the SUV. She exited the vehicle and walked around the SUV entering the passenger door. He stated the female was not acting appropriate with the situation as she was entering a vehicle with visible flames coming from the engine compartment. Pearce stated he believed the female smelled like cigarette smoke or marijuana, he identified the female as the occupant of the SUV and stated the female had told him she was the only occupant.

PROBABLE CAUSE STATEMENT FORM

CRN 19-023380

On 04/01/2019 at 1031 hours, Det. C. Rives and I responded to Research Medical Center, 2316 E Meyer Blvd., Room #4119 where we contacted **Williams**. She was advised of her Miranda Rights as they were read aloud from Form 340 PD. **Williams** acknowledged she understood her rights and agreed to make a statement. **Williams** stated she was at her brother's friend's house at a location she did not know. She stated she was driving north towards her house on a highway she did not know the name of when she was struck by another vehicle. **Williams** stated she uses GPS to get around and is unfamiliar with street names and locations. **Williams** initially denied consuming alcohol or drugs (legal or illegal) then admitted to marijuana use a couple weeks ago and stated she consumed one wine cooler at approximately 5 in the evening. **Williams** stated she was the sole occupant of the maroon Cadillac.

A computer check of **Williams** revealed a valid operator's status through Missouri Department of Revenue with one prior alcohol conviction.

On or about 01/17/2016, the defendant was convicted of DWI, in the Circuit Court of Jackson County, Missouri, in case #70092100, for events that occurred on 07/17/2013.

Printed Name Det. Lawrence Pollard #5044 Signature *Det. Lawrence Pollard #5044*

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

Judge

Circuit Court of _____ County, State of Missouri.