

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

<b>POLICE NO. :</b>	18-0272808
<b>PROSECUTOR NO. :</b>	095447801
<b>OCN :</b>	hospitalized

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>SEAN RICHARD STOFF</b>	)	
<b>313 Brookwood Drive</b>	)	<b>CASE NO.</b>
<b>Blue Springs, MO - 64014</b>	)	<b>DIVISION</b>
<b>DOB: 07/13/1984</b>	)	
<b>Race/Sex: /M</b>	)	
<b>[REDACTED]</b>	)	
	)	<b>DEFENDANT.</b>

**MISDEMEANOR INFORMATION**

**In the Circuit Court of Jackson County, Missouri, at Independence, Term, 2019. In Division Number 30 thereof, designated by the rules of said Court as Criminal Division.**

**Count I. Operated A Motor Vehicle In A Careless And Imprudent Manner-  
Involving An Accident (304.012-002N199654050)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 304.012, RSMo, committed the class A misdemeanor of careless and imprudent driving, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about May 9, 2018, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle on a public road known as 350 Hwy near Maple Street, in a careless and imprudent manner by failing to stop at a red traffic signal, and thereby endangered the life and limb of any person and was at that time involved in an accident.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); or by both

**State vs. Sean Richard Stoff**

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 up to a maximum of twenty thousand dollars (\$20,000).

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 a summons be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

/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. TPR Geoffrey L. Billings, 504 E. Blue Pkwy, Lees Summit, MO 64063
2. CPL Nate Bradley, 504 E. Blue Pkwy, Lees Summit, MO 64063
3. Jocelynn Durham,
4. TPR Jack Frost, 504 E. Blue Pkwy, Lees Summit, MO 64063
5. Thomas R Hammond, 6137 Ditzler Ave., Raytown, MO 64133
6. Robbie A. Highfill, 6213 Hadley Street, Raytown, MO 64133
7. Christopher S Reed, 4325 Ditzler, Kansas City, MO 64133
8. Dave Respass, StarChase,
9. CPL Bradley D. Ussary, 3525 N. Belt Hwy., Saint Joseph, MO 64506-1370
10. DEP Drew VanBibber, 3310 NE Rennau, Lees Summit, MO 64064
11. DEP Jesse Whitener, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703

## Statement of Probable Cause

Date: 09-05-2018

MSHP Report #180272808

I, Trooper Jack Frost, a Trooper with the Missouri State Highway Patrol, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that Sean Richard Stoff, (White/Male; DOB July 13, 1984; [REDACTED]) committed one or more criminal offenses at or near Missouri 350 Highway and Maple Street, Raytown, in Jackson County Missouri. The facts supporting this belief are as follows:

On May 9, 2018, at 0135 hours, Sean Stoff, while employed by the Jackson County Sheriff's Department and while on-duty, was assisting in the pursuit of a fleeing subject southbound on Missouri 350 at Maple Street, Raytown, Missouri. Sean Stoff had deactivated his patrol vehicle's emergency equipment but continued to travel at a high rate of speed while tracking the suspect's GPS coordinates through his dispatch. While the traffic signal for Missouri 350 and Maple Street displayed a solid red signal to southbound traffic, and a solid green left-turn signal to northbound traffic, Sean Stoff entered the intersection traveling southbound. At the same time, Christopher Reed was turning left in his vehicle from northbound Missouri 350 onto Maple Street, and was struck by Sean Stoff's patrol vehicle. Christopher Reed was ejected from his vehicle and was later transported to Research Medical Hospital. Mr. Reed suffered serious, disabling injuries as a result of this crash.

Corporal N. Bradley completed a Technical Crash Report Supplement. During his investigation, Corporal Bradley obtained the in-car video from Sean Stoff's patrol vehicle at the time of the crash. He also obtained video from Deputy Vanbiber's vehicle who was traveling directly behind Stoff at the time of the crash. His video also captures the crash.

In Stoff's video, you can see indicators at the bottom of the screen which display the speed of his vehicle and whether or not his microphone, brakes, emergency lights and sirens are activated. At the time of the crash, Stoff's vehicle was traveling 71 mph at impact and his emergency lights and siren were not activated.

In VanBiber's video, you can see the red traffic light illuminated as the deputies approached the intersection. Stoff did not slow as he approached the intersection and his lights and sirens were not activated as he approached the intersection.

Trooper Jack Frost

Printed Name

/s/ Jack Frost

Signature