

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	19-004194
PROSECUTOR NO. :	095452753
OCN:	ca013539

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
ESTAKIO J ALFONS)	
1553 SW Shelby Ct)	CASE NO. 1916-CR
Lees Summit, MO 64081)	DIVISION
DOB: 06/24/1975)	
Race/Sex: W/M)	
[REDACTED])	
	DEFENDANT.)

COMPLAINT

Count I. Property Damage 1st Degree - L/e Or Relative (569.100-004Y20172903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the class D felony of property damage in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 19, 2019, in the County of Jackson, State of Missouri, the defendant knowingly damaged the building at 10 NE Tudor Rd. Lee's Summit, Mo, which property was owned by City of Lee's Summit Police Department, by driving his truck into the building, and the damages to such property exceeded seven hundred and fifty dollars and the Lee's Summit Police Department is a law enforcement agency.

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 four (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 II. Driving While Intoxicated (577.010-032Y20175404.0)

State vs. Estakio J Alfons

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 misdemeanor of driving while intoxicated**, punishable upon conviction under Sections 558.002, 558.011 and 577.010 RSMo, in that on or about May 19, 2019, at or near 10 NE Tudor Rd, Lee's Summit, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and the defendant operated the motor vehicle with fifteen-hundredths of one percent or more by weight of alcohol in his or her blood.

The range of punishment for a class B misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed six (6) months; by a fine not to exceed one thousand dollars (\$1,000); 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,

/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 Robert Berg,
2. CIV Auburne Counihan, 10 NE Tudor, Lee's Summit, MO 64086
3. PO Zachary James, 10 NE Tudor, Lee's Summit, MO 64086
4. PO Andrew Jones, 10 NE Tudor, Lee's Summit, MO 64086
5. CIV Kellene Lyman, 10 NE Tudor, Lee's Summit, MO 64086
6. PO Jessica Morse, 10 NE Tudor, Lee's Summit, MO 64086
7. Tonia Packard,
8. Michael Perkins, 10 NE Tudor, Lee's Summit, MO 64086
9. DET Michael Reese, 10 NE Tudor, Lee's Summit, MO 64086

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 19-4194

Date: May 20, 2019

I, Detective Michael Reese, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 05/20/2019, at 10 NE Tudor Rd, Lee's Summit, Jackson County Missouri, Estakio J. Alfons, P/I, 06/24/1975, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 05/20/2019, Estakio Alfons entered the property and front parking lot of the Lee's Summit Police Department while operating a silver Jeep Patriot SUV. Alfons navigated the Jeep by circling around the parking lot before turning back toward the front entrance of the Police Department / Municipal Court building occupied by multiple Police Department employees. Alfons stops the Jeep facing the front of the building and then accelerates the Jeep between two square rock barriers before striking the building causing broken glass and structural damage. Alfons reverses the Jeep back away from the building and accelerates the Jeep forward again striking the building a second time causing additional broken glass and structural damage. Alfons reverses the Jeep back from the building again and was contacted by Officers exiting the building. Officers detected the odor of alcohol emitting from Alfons' person and conducted Standard Field Sobriety Tests with negative results. Alfons was read his constitutional rights per the Miranda decision and provided a breath sample that resulted in an excessive B.A.C. (Blood Alcohol Concentration) level of .179. Alfons stated he was on his way home from a "after work party", he was tired and fell asleep in the parking lot and woke-up when he crashed into the building. This incident occurred in Lee's Summit, Jackson County, MO.

Detective Reese's investigation included processing the scene that revealed a silver 2015 Jeep Patriot SUV displaying Missouri license plate TA6 P6R registered to Estakio Alfons parked past the concrete barriers up on the concrete approximately six feet away from the front of the building. The SUV contained a deflated damage right front tire sustained from one of the concrete barriers along with a damaged front end and glass resting on the hood. The building was observed to have a large amount of structural damage and broken glass that extended up and well into building. An inventory of the Jeep during the tow process revealed a bottle of Michelob Ultra containing a liquid consistent with beer laying open on the center console and an empty Michelob Ultra beer box in the cargo compartment. Detective Reese reviewed the security video footage that revealed the following: The Jeep enters the parking lot from the south entrance and travels north through the parking lot before coming back south and lining-up with the front of the building. Once lined-up, the Jeep accelerates between the concrete barriers straight into the building, backs-up and then accelerates again into the building. The Jeep backs-up again and Alfons is contacted by Officers exiting the building. At the time of the incident, the building was occupied by multiple Law Enforcement Officers, Administration and Dispatch personnel.

Detective Reese interviewed three separate Dispatchers who stated they heard a "crashing sound" and observed that the vehicle had struck the building. All three stated the vehicle backed-up and drove again into the building causing damage.

The damage to the building was in excess of \$750

Detective Michael Reese #0727
Print Name (Detective)

/S/ Detective Michael Reese #0727
Signature (Detective)

May 20, 2019
DATE