

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

POLICE NO. :	19-004691
PROSECUTOR NO. :	095455276
OCN:	

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
LAUREN N MICHAEL	)	
11307 Milton Thompson Rd.	)	CASE NO. 1916-CR
Lees Summit, MO 64086	)	DIVISION
DOB: 03/24/1990	)	
Race/Sex: W/F	)	
	)	
DEFENDANT.	)	

**COMPLAINT
WARRANT REQUESTED**

Count I. Assault 1st Degree Or Attempt (565.050-002Y19791304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class B Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 8, 2019, in the County of Jackson, State of Missouri, the Defendant shot at the victim, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of , and was done for the purpose of committing such assault.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served. 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.

Count II. Armed Criminal Action (571.015-001Y19755213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of Armed Criminal Action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about August 8, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree as charged in

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Count 1, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Assault in the First Degree by, with, and through, the knowing use, assistance, and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

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/ Dion Sankar
Dion Sankar (#64333)
Assistant Prosecuting Attorney
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WITNESSES:

1. DET Richard A. Berger, 3310 NE Rennau Drive, Lees Summit, MO 64064
2. Doug Blodgett, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
3. DEP Ray Heck, 3310 NE Rennau Drive, Lees Summit, MO 64064
4. DEP Collin Love, 3310 NE Rennau, Lees Summit, MO 64064
5. DEP Dustin Love, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
6. DEP Sean Plain, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
7. [REDACTED]

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I, Detective Richard Berger, 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 August 8, 2019, at or near 4048 Oak St. and 4050 Oak St., Kansas City, MO, which is inside the boundaries of Jackson County, Missouri, Lauren N. Michael, W/F, D/O/B: March 24, 1990, [REDACTED], last known address: 11307 Milton Thompson Rd., Lee's Summit, MO, committed one or more criminal offense(s).

2. The facts supporting this belief are as follows:

On August 8, 2019, members of the Jackson County Sheriff's Office traffic safety unit were on routine assignment in or around the Midtown/Westport area of Kansas City, Missouri. Unit members include Sergeant Blodgett #24, Deputy Heck #98, Deputy Plain #101, Deputy C. Love #32, Deputy D. Love #61, and Deputy Lauren Michael #56.

According to Deputy D. Love, at approximately 2249 hours, he was backing Deputy Heck on a vehicle stop in the area of 37th St. and Main St. when he observed a Bird scooter, occupied by a male driver and female passenger, travelling southbound in the northbound lanes of traffic. Deputy D. Love gave a verbal order for the driver to stop and used his flashlight to get the attention of the driver; however, both scooter occupants looked back, and the driver continued southbound. Deputy D. Love activated his emergency lights, and he caught up to the scooter in the area of 3731 Main St. Deputy D. Love pulled into a parking lot, in front of the scooter, and, as a result, the scooter collided with the side of his patrol vehicle.

Deputy D. Love exited his vehicle, and he took the driver of the scooter into custody. Deputy D. Love attempted to detain the female passenger, later identified as [REDACTED], W/F, D/O/B: October 26, 1993, and he told her to turn around, to which she replied, "No! Fuck you!" and ran southbound. Deputy D. Love announced he was in foot pursuit, and he gave a description of [REDACTED] as wearing a white

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shirt and as having braids. At this time, dispatch alerted all units, and all radio traffic was restricted to the incident at hand.

A short time later, Deputy D. Love spoke to Sergeant Blodgett over the radio, which can be heard by all Sheriff's Office patrol and traffic units, and informed him that the only thing (charge) he had on [REDACTED] was the failure to obey a lawful order by running, and he had the operator of the vehicle (scooter) in custody. The aforementioned charge, is outlined in the Jackson County, Missouri petty offense code, Chapter 55, Ord. 5539, penalty sec. 5520. The violation of this section is a misdemeanor, and upon conviction is subject to a fine of not more than one thousand dollars (\$1000) or by imprisonment in the county jail for a term not exceeding one (1) year, or by both.

At 2256 hours, Sergeant Blodgett advised dispatch to clear the air, allowing normal radio traffic.

According to Deputy Michael, at approximately 2314 hours, she was still canvassing the area for [REDACTED]. She located [REDACTED] sitting on concrete steps of 4048 Oak St. Deputy Michael did not immediately inform dispatch that she had located [REDACTED].

Deputy Michael's dash camera video was extracted and recovered from her vehicle. The video has no audio.

On the video, [REDACTED] stood up from a seated position on the steps and walked toward Deputy Michael with a bag in her hand, which was apparently a drink. Both individuals were out of view of the video; however at approximately the 23:15:11 time mark, Deputy Michael can be seen attempting to detain [REDACTED], and, in that effort, Deputy Michael eventually grabbed [REDACTED] hair and pulled her to the ground. As Deputy Michael is pulling [REDACTED] by the hair, the drink in [REDACTED] hand spills on Deputy Michael. After Deputy Michael took [REDACTED] to the ground, the video depicts only [REDACTED] legs, but a small portion of Deputy Michael's left side is briefly visible.

At approximately the 23:16:05 time mark, [REDACTED] legs twitched and then [REDACTED] appeared to suddenly get up and run away from the area. Seconds later, at approximately the 23:16:11 time mark, smoke can be seen entering the video's view, which is presumed to be a result of Deputy Michael discharging her service weapon.

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Deputy Michael advised dispatch that shots had been fired and that she had been tased. She relayed that [REDACTED] was running south, and [REDACTED] was holding her left butt cheek.

Deputy Michael was given a Miranda warning and voluntarily spoke with investigators. Deputy Michael reported that, prior to encountering [REDACTED] at 4048 Oak Street, she was aware that [REDACTED] was the passenger on the scooter and was wanted only for fleeing from, or disobeying Deputy D. Love's order.

Deputy Michael stated that, upon finding [REDACTED], she immediately attempted to arrest [REDACTED] but that [REDACTED] resisted by arguing with her and throwing a drink at her. Deputy Michael stated that, after she took [REDACTED] to the ground, [REDACTED] tensed up and continued to resist, causing Deputy Michael to radio other deputies and give her location and indicate that she was "fighting" with a suspect. While [REDACTED] was still on the ground and on her back, Deputy Michael was kneeling beside her. Deputy Michael reported that [REDACTED] continued to resist and was not allowing Deputy Michael to put her in handcuffs. Deputy Michael reported that, at that time, she pulled her Taser and tased [REDACTED] in the stomach area. Deputy Michael then reported that [REDACTED] continued to fight her and then fought Deputy Michael for the Taser, eventually gaining control of the taser. Deputy Michael stated that, shortly thereafter, she was tased on her left leg. Deputy Michael next reported that "nothing" she had done, referencing taking [REDACTED] to the ground and using her Taser, was stopping [REDACTED]. Because of this, Deputy Michael stated that she feared that [REDACTED] would take her firearm and use it against her, so she drew her weapon and fired three to four shots at [REDACTED]. Deputy Michael stated that [REDACTED] was above her at the time that she fired the shots.

[REDACTED] was also formally interviewed. [REDACTED] stated that when Deputy Michael contacted her, Deputy Michael got out of her car with her Taser already drawn and told her to get on the floor. She responded by replying, "for what?" [REDACTED] stated that Deputy Michael would not tell her why she was being detained. [REDACTED] stated that Deputy Michael attempted to tackle her and then eventually took her to the ground and then tased her in the stomach. [REDACTED] explained that she reacted to being tased by pushing the Taser away from her stomach and getting up and running. [REDACTED] stated that, while she was running, she was shot in the back. [REDACTED] said that she did not take the Taser away from Deputy Michael and had no intention of hurting her.

KCPD Crime scene personnel located five spent .40 caliber cartridge cases and Deputy Michael's department issued Taser in the driveway between 4050 Oak St. and 4048 Oak St.

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Both Taser cartridges had been deployed. A download of the Taser's ECM (Electronic Control Module) revealed the Taser to have been armed, and both cartridges deployed within the span of three seconds. Given the limited amount of time, this does not support Deputy Michael's statement that after she tased [REDACTED], [REDACTED] fought Deputy Michael for the Taser and then tased Deputy Michael.

A download of Deputy Michael's firearm showed five live .40 caliber cartridges to be missing from her firearm's magazine. Deputy Michael's vehicle was located immediately next to the area where Deputy Michael and [REDACTED] came into contact with each other on the northwest of Oak St. KCPD Crime Scene personnel identified a bullet entrance hole on the driver's side door area of Deputy Michael's vehicle. In addition, KCPD Crime Scene personnel identified bullet damage to another vehicle that was some distance away on the southeast side of the street, across from 4054 Oak St., and closer to the direction in which [REDACTED] ran after leaving the encounter with Deputy Michael.

There is no indication that [REDACTED] was armed with a weapon prior to or during her encounter with Deputy Michael. After running away from Deputy Michael, [REDACTED] was located further south of the shooting scene in a nearby apartment complex at 4041 Oak St. She was taken into custody and transported to a local hospital with gunshot wounds to her back and buttock area.

Jackson County Sheriff Department's records show that this is the second shooting involving Deputy Michael and a civilian. In May 2017, Deputy Michael shot and killed a civilian. That civilian previously fled from Michael, and she knew him to have active felony warrants for his arrest for tampering with a motor vehicle and robbery. On the day of that shooting, that civilian was reported to have taken items from a Walmart without paying. Deputy Michael was working as security in an off-duty capacity at that Walmart and noticed that the person attempting to leave with the unpaid items was the same civilian with the previously mentioned felony arrest warrants. In attempting to take the civilian into custody, Deputy Michael used her Taser on the civilian and then reported that the civilian took her Taser. After being tased in the face by the civilian, Deputy Michael shot the civilian multiple times.

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In the moments immediately following the August 8, 2019 shooting involving [REDACTED], Deputy Michael reported to Sergeant Blodgett #24 words to effect of "I am not as comfortable with this one as the last one."

/S/ Richard A. Berger

Detective Richard A. Berger
Jackson County, MO Sheriff's Office