

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

<b>POLICE NO. :</b>	19-003775
<b>PROSECUTOR NO. :</b>	095453556
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>TYLER A. SELBY</b>	)	
<b>2844 SW Carlton Drive</b>	)	<b>CASE NO. 1916-CR</b>
<b>Lees Summit, MO 64082</b>	)	<b>DIVISION</b>
<b>DOB: 10/08/1985</b>	)	
<b>Race/Sex: W/M</b>	)	
<b>S.S.N.: XXX-XX-5632</b>	)	
	<b>DEFENDANT.</b>	)

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Involuntary Manslaughter-2nd Degree (565.027-001Y20170909.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.027, RSMo, committed the **class E felony of involuntary manslaughter in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 7, 2019, in the County of Jackson, State of Missouri, the defendant caused the death of Sherman L. Thompson by colliding with a vehicle in which the victim was an occupant and did so with criminal negligence in that defendant driving too fast.

The range of punishment for a class E 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 (4) 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 statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

**State vs. Tyler A. Selby**

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 Christy Griffin, 10 NE Tudor, Lee's Summit, MO 64086
2. Michael Perkins, 10 NE Tudor, Lee's Summit, MO 64086
3. Sherman L. Thompson, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. PO Todd Weger, 10 NE Tudor, Lee's Summit, MO 64086
5. James Zimmerman, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

# STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 19-3775 (MVA) 19-4100 (Property)

Date: 06-28-2019

OCN : None

I, Traffic Officer Mike Perkins, a Police Officer 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 05/07/2019 at 0820 Hrs. on SW 3<sup>rd</sup> St. at SW Rogers Dr. city of Lee's Summit, County of Jackson, State of Missouri, 64081, Tyler A Selby, 10-08-1985, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 05-07-2019 at 0820 Hrs., Ofc. C. Griffin with the Lee's Summit Police Department was dispatched to the area of SW 3<sup>rd</sup> St. and SW Rogers Dr. in regard to a two vehicle crash. Upon arrival, Ofc. Griffin located both vehicles involved and both drivers were present. Both vehicles had disabling damage and had to be towed from the scene. Front air bags were deployed in both vehicles.

Ofc. Griffin made contact with Tyler Selby who was driving a 2018 Tesla Model 3 westbound on SW 3<sup>rd</sup> St. and he stated that a vehicle driven by Sherman Thompson made a turn in front of him causing the crash.

Sherman Thompson was southbound on SW Rogers Dr. and making a turn from Rogers onto SW 3<sup>rd</sup> St. Thompson was being treated at the scene by ambulance personnel and Ofc. Griffin was unable to speak with him at the time. Thompson was injured in the crash and taken by ambulance to Centerpoint Hospital. Ofc. Griffin went to Centerpoint Hospital and was able to speak with Thompson there and he stated that prior to making a turn onto SW 3<sup>rd</sup> St. from Rogers he did not see Selby's vehicle coming westbound on SW 3<sup>rd</sup> St. and he was struck while turning onto 3<sup>rd</sup> St.

Witness James Zimmerman was westbound on SW 3<sup>rd</sup> St. in the left lane when he noticed Selby's vehicle approaching from the rear at a very high rate of speed. Zimmerman stated that Selby's vehicle reached his and made a lane change to the right and passed him. Zimmerman stated that his vehicle was going about 35-40 MPH and he estimated that Selby's vehicle was going about 20 MPH faster than his.

A search warrant was obtained through the Jackson County Missouri Court to obtain the data contained in an air bag control module for Tyler Selby's vehicle. The data from the module shows actions of Selby's vehicle five seconds prior to the air bags in the Tesla being deployed due to the crash. The data shows that 5.0 seconds prior to deployment, Selby's vehicle was going 65 MPH. At 3.6 seconds prior to deployment, Selby's vehicle was going 68 MPH. Selby's vehicle then begins to decrease in speed down to 54 MPH 1.0 second until deployment. Selby's vehicle shows a speed of 48 MPH 0.0 seconds before deployment. The roadway on SW 3<sup>rd</sup> St at SW Rogers Dr. is a posted 35 MPH zone.

Sherman Thompson was admitted to Centerpoint Hospital on 05/07/2019 due to his injuries sustained in the crash. According to the Jackson County Medical Examiner's Report, Sherman Thompson suffered a C2 fracture, multiple rib fractures, and a subdural hematoma. While in the hospital, Thompson had increased respiratory distress and on 05/12/2019, Thompson "coded" and the hospital was unable to regain any rhythmic activity. Sherman Thompson was pronounced dead on 05/12/2019 at 0830 HRS by Dr. Kakumanu, The Jackson County Medical Examiner's Office concluded that Sherman Thompson died from multiple blunt force trauma and the manner of the trauma was a traffic accident.

# STATEMENT OF PROBABLE CAUSE

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Based upon the circumstances, Tyler Selby acted with criminal negligence by driving at nearly double the posted speed 68 MPH, on a roadway that had a speed limit posted at 35 MPH. Selby's vehicle struck Sherman Thompson's vehicle causing injury to Thompson and he had to be transported from the scene of the crash by ambulance to Centerpoint Hospital. Thompson was admitted to Centerpoint Hospital where he remained until 05/12/2019 when he died from his injuries according to the Jackson County Medical Examiner's report.

Tyler Selby shows a driving history of five past speeding citations in Missouri.

Mike Perkins 0810  
\_\_\_\_\_  
Print Name (Police Officer)

/s/Mike Perkins  
\_\_\_\_\_  
Signature (Police Officer)