

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

POLICE NO. :	KC20009096
PROSECUTOR NO. :	095457495
OCN:	HS017378

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ADDAE J DOYLE)	
3707 North 124th Street)	CASE NO. 2016-CR
Kansas City, KS 66109)	DIVISION
DOB: 01/02/1978)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20174801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the **Class E Felony of Resisting a Lawful Stop**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 5, 2020, in the County of Jackson, State of Missouri, a law enforcement officer with the Kansas City, Missouri Police Department, was attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officers were making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant operated the motor vehicle on a closed street near pedestrians at a high rate of speed and disobeyed traffic control devices.

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

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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. Possession Of Controlled Substance Except 35 Grams Or Less Of Marijuana/synthetic Cannabinoid (579.015-001Y20173572.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.015, RSMo, committed the **Class D Felony of Possession of a Controlled Substance**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 5, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed methamphetamine, a controlled substance, knowing of its presence and nature.

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 seven (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 III. Driving While Intoxicated (577.010-032Y20175403.0)

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 Misdemeanor of Driving While Intoxicated**, punishable upon conviction under Sections 558.002, 558.011 and 577.010 RSMo, in that on or about February 5, 2020, at or near Front Street and Riverfront Rd, Kansas City, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of cocaine and amphetamine, controlled substances.

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 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.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

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JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kristin A. Ries
Kristin A. Ries (#66178)
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WITNESSES:

1. PO Nathan I. Magers, 1125 Locust, Kansas City, MO 64106
2. DET Kevin D. Richardson, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02-05-2020

CRN: 20-009096

I, Det. K. Richardson #4290

(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 02-05-2020, at Front Street and Riverfront Road in Kansas City, Jackson Missouri, Addae J. Doyle B/M 01-02-1978

committed one or more criminal offense(s). Resist Arrest- Eluding/ DWI/ Possession of controlled sub

The facts supporting this belief are as follows:

On 02-05-2020 at approximately 0813 hours, multiple law enforcement agencies were assigned to work the Chiefs Parade Celebration and had closed down and secured the parade route from Riverfront Park to Pershing Road and Grand Boulevard, Kansas City, Jackson County, Missouri, near Union Station. A vehicle described as a green Ford Taurus approached the barricaded location of Front Street and Riverfront Road, where multiple barricades had been positioned blocking the roadway. The driver of the Ford Taurus later identified as ADDAE J. DOYLE BM 01-02-1978 failed to stop at the barricade where an officer was positioned as well. DOYLE struck and knocked down multiple barricades and continued driving southbound along on the closed parade route on Grand Boulevard. In the area of E. 5th Street and Grand Boulevard, a marked police vehicle began pursuing DOYLE by activating their emergency vehicle's red flashing lights and siren. DOYLE refused to stop and accelerated his vehicle to approximately 60 MPH while driving down the closed parade route with hundreds of pedestrians along the parade route. Along the parade route were multiple points where pedestrians were allowed to cross Grand Boulevard, those locations included the following; E. 3rd Street and Grand Boulevard, E. 9th Street and Grand Boulevard, E. 13th Street and Grand Boulevard, Truman Road and Grand Boulevard, E. 18th Street and Grand Boulevard, E. 22nd Street and Grand Boulevard. With multiple emergency vehicles actively pursuing DOYLE he continued to refuse to stop. Officers working the parade route were able to deploy stop sticks and deflate all four of DOYLE'S vehicle tires. DOYLE continued driving northbound on Grand Boulevard at a high rate of speed on flat tires. Once in the area pf Pershing Road and Grand Boulevard, Police Officers were able to TVI (tactical vehicle intervention) DOYLE'S vehicle, disabling his vehicle. DOYLE was taken into custody after being removed from the driver's seat of the vehicle. DOYLE was transported to TMC Hospital for evaluation.

Inventory of DOYLE'S vehicle revealed a clear plastic baggy containing a rock like substance sitting on the driver seat of the vehicle. Detective J. Mutschler recovered the clear plastic baggy containing the rock like substance weighing approximately 4 grams. Sergeant K. Huntington field tested the rock like substance using a TruNarc device and substance tested positive for methamphetamine.

DWI Officer N. Magers, who is also a trained drug recognition officer, responded to TMC Hospital and contacted DOYLE. Officer N. Magers observed DOYLE to be swaying and have poor balance. DOYLE'S eyes were watery and bloodshot and his pupils were constricted and slow to react to light. DOYLE'S speech was heavily slurred and confused. Officer N. Magers administered the horizontal and vertical gaze nystagmus on DOYLE. DOYLE displayed all six clues of impairment during HGN. DOYLE also was positive for VGN. Officer Magers read DOYLE Missouri Implied Consent and requested he submit to a chemical blood test. DOYLE agreed to chemical blood test. While at TMC Hospital, TMT Arnold drew two vials of DOYLE'S blood on 02-05-2020 at 0934 hours. Further, TMT Lager drew two additional vials of blood from DOYLE on 02-05-2020 at 1012 hours. Officer N. Magers recovered the four vials of DOYLE'S blood. Officer N. Magers then transported and released to the four vials of DOYLE'S blood to Children's Mercy Toxicology Lab for further investigation. It should be noted while at TMC Hospital, DOYLE admitted to using PCP and methamphetamine.

PROBABLE CAUSE STATEMENT FORM

CRN 20-009096

I later interviewed DOYLE. After waiving his rights, per Miranda, DOYLE stated the following. He didn't remember or know what he was doing when he got arrested. The last thing DOYLE remembered is getting high. DOYLE refused to state which drugs he had done, because he didn't remember. DOYLE also remembered being pulled out of the vehicle by police pulling on his arm.

Preliminary toxicology results revealed DOYLE tested positive for the presence of amphetamines and cocaine.

A computer check of DOYLE revealed him to have no operator's status through Missouri DOR.

Printed Name Det. K. Richardson #4290

Signature

Det. Richardson #4290

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

Judge

Circuit Court of _____ County, State of Missouri.