

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

POLICE NO. :	KC22035267
PROSECUTOR NO. :	095469878
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
LEONNA M HALE)	
645 Nebraska Ave.)	CASE NO. 2216-CR
Kansas City, KS 66101)	DIVISION
DOB: 01/06/1996)	
Race/Sex: B/F)	
)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Unlawful Possession Of A Firearm (571.070-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about May 27, 2022, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Lorcin Model L25 handgun, a firearm, and on or about August 21, 2020, the defendant was convicted of the felony of possession of methamphetamine and the felony of interference with a law enforcement officer in the District Court of Johnson County, Kansas, and on or about April 4, 2018, the defendant was convicted of the felony of possession of methamphetamine in the District Court of Johnson County Kansas.

The range 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 one (1) year 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.

State vs. Leonna M Hale

Count II. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class E felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 27, 2022, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a Lorcin Model L25 handgun, a weapon readily capable of lethal use, in an angry or threatening manner.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range 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 one (1) year 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.

Count III. Resisting/Interfering With Arrest, Detention Or Stop (575.150-003Y20204899.0)

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 A misdemeanor of resisting a lawful detention**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 27, 2022, in the County of Jackson, State of Missouri, K.C. and J.R., law enforcement officers, were attempting to make a lawful detention of defendant, and the defendant knew or reasonably should have known that the officers were making a lawful detention, and, for the purpose of preventing the officers from effecting the detention, resisted the detention of defendant by fleeing from the officers.

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 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).

State vs. Leonna M Hale

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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jordan L. Logan
Jordan L. Logan (#63975)
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City, MO 64106

8. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 05-31-2022

CRN: KC22-035267

I, Det. Jeremy D. Wells #5015 Kansas City, Missouri Police Department
(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 05-27-2022, at 634 Prospect Ave in
(Date) (Address)

Kansas City, Jackson Missouri Leonna M. Hale
(County) (Name of Offender(s))

B/F 01-06-1996 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 05-27-2022 at approximately 1953 hours, Officers of the Kansas City, Missouri Police Department were in the area of 6th Street and Prospect Ave Kansas City, Jackson County, MO on patrol when they observed a maroon Chrysler Town and County minivan bearing license EH2-Y2J MO. The vehicle had been broadcast via KCPD Dispatch as an armed robbery car-jacking from Kansas City, Kansas (#22-48389).

The vehicle was located in the northeast corner of the **Family Dollar at 634 Prospect Ave Kansas City, Jackson County, MO** backed into a parking spot with two occupants inside. Officers activated their vehicle lights and audio video equipment to conduct a car check after it was determined the vehicle was taken in regard to the aforementioned offense and the suspects were both armed at the time of the robbery. The male driver exited the vehicle and ran from the scene in a northeast direction with two officers giving chase. The second female occupant exited the passenger side of the vehicle and retreated to the rear of the van in an east then southern direction. Two additional officers, K.C. and J.R., exited their marked vehicles attempting to give verbal commands to the female who refused to comply continuing south on foot. The officers determined the female was armed and she pointed a firearm at them causing officers to discharge their firearms striking the female. She was transported to an area hospital and admitted for her injuries. The male driver was taken into custody a few blocks east of the location (**2661 Independence Ave Kansas City, Jackson County, MO**) and requested to be transported to the hospital.

Video surveillance was collected from officer's in-car audio/video cameras as well as the body worn audio/video cameras (BWC) worn by the officers. All officers involved in the above captioned incident were in full department approved uniforms with full police markings affixed to the uniform. In reviewing the video associated to J.R., I observed she is in the driver's seat of the police vehicle and is observed to exit the vehicle with her firearm deployed in the direction of the vehicle taken from KC, KS. It is observed K.C. is on the passenger side of the stolen vehicle providing verbal commands to the female passenger identified as **Leonna M. Hale B/F, 01-06-1996**. **Hale** is observed getting out of the passenger side of the vehicle and running to the east then south. As **Hale** is observed coming from the driver rear of the vehicle the BWC captures **Hale** with a

PROBABLE CAUSE STATEMENT FORM

CRN KC22-035267

firearm in her right hand pointing/tracking officers as she continues south through the grassed area east of the parking lot. J.R. and K.C. are heard giving **Hale** additional verbal commands to drop the firearm and **Hale** is observed to still be pointing the firearm in the victims' direction. I hear three gunshots and **Hale** appears to stumble to the ground then continues into the east parking lot, falls to the ground, and does not appear to have the firearm in her hands any longer. J.R. is observed giving **Hale** verbal commands, approaching her, placing her into handcuffs, and confirming that an officer had called for KCFD-EMS to respond as **Hale** had sustained injuries from the shooting. **Hale** was transported to an area hospital where she was admitted, is listed in stable condition, still intubated, and unable to provide a statement to detectives in regard.

Body worn camera from K.C. is consistent with that of J.R. and all actions by **Hale** are captured from a slightly different angle and vantage point as the officers were approaching from different locations. K.C.'s bodycam did capture **Hale** to have no firearm in her right hand when she exited the vehicle; however as **Hale** is running from the officers, I observed her to have a firearm in her right hand pointed in the direction of the officers as she is running away from them.

The suspect #2 and Hale were arrested under an investigative hold for Homicide 1020 Squad. The male was treated and released from the hospital and transported to East Patrol Detention for completion of booking. The female, Hale, remains in an area hospital in stable condition. One firearm was located not far from the female suspect, where she had dropped it, and an additional firearm was located in the driver side door pocket. Both firearms were discovered to have one live round in the chamber of each and additional live rounds in the magazines. No officers were observed to have injuries from this incident on scene.

J.R., (Kansas City, Missouri Police Officer) provided a statement to the Highway Patrol Investigators in regard to this incident. She stated she and her partner heard the broadcast information supplied by KCPD dispatch in regard to the aforementioned armed carjacking vehicle and were provided information from an LPR (License Plate Reader Cameras) the vehicle had recently been in the area of 9th and Prospect Ave. She stated they moved into the area when they were contacted about the EPD Impact Officers locating the vehicle backed into a parking spot on the northeast corner of the Family Dollar parking lot. She advised they entered the parking lot from the southeast corner entrance and stopped at the front left corner of the KC, KS car jacked van. She stated her partner ran after the male driver and she approached the van from the south driver side giving **Hale** verbal commands. She stated **Hale** was looking around as if trying to locate a place to run while K.C. was giving **Hale** verbal commands. She advised **Hale** ran behind the van and as J.R. was approaching the rear of the van, **Hale** appeared and pointed a firearm at her. She stated she was in fear **Hale** was going to shoot her and she discharge her firearm one time. She began to make her way back to near her patrol vehicle and observed **Hale** lying in the parking lot and did not observe the firearm in possession of **Hale** any longer.

K.C. (Kansas City, Missouri Police Officer) provided a statement to the Highway Patrol Investigators in regard to this incident. He stated he and his partner heard the broadcast information supplied by KCPD Dispatch in regard to the aforementioned armed carjacking vehicle and were provided information from an LPR (License Plate Reader Cameras) the vehicle had recently been in the area of 9th and Prospect Ave. He stated they located the vehicle in the Family Dollar parking lot and advised dispatch while setting up across the street to keep an eye on the vehicle. He stated he observed a black male walking from the Family Dollar toward the vehicle and get into the driver seat. He stated they moved the police vehicle into the parking lot on the right side front of the vehicle and began giving verbal commands to the occupants. He advised the male ran from the driver side of the

PROBABLE CAUSE STATEMENT FORM

CRN KC22-035267

vehicle and two officers began to chase him while he stayed behind with the van and **Hale**. He stated **Hale** was standing inside the passenger side open door of the van and **Hale** was refusing to get on the ground or follow verbal commands. He advised **Hale** appeared to be reaching with her left hand into the vehicle and then ran or fast walked toward the rear of the van. He advised as he pursued **Hale** he observed her to have a firearm pointed at him and he heard one shot, flinched, felt some pain, and believed he may have been shot. He stated he discharged his firearm at **Hale** twice and observed **Hale** drop the firearm at the front left corner of a dark vehicle south of where the **Hale** had run from. He advised he was unaware J.R. had been to his right at the time he discharged his firearm and described the firearm **Hale** had dropped as a small firearm and observed it near the dark vehicle where he originally observed it dropped by **Hale**.

Suspect #2 (male witness) was transported to East Patrol Detention upon being released from an area hospital and was booked in for this investigation and an unrelated outstanding warrant. He was read his Miranda Rights aloud utilizing the Adult Miranda Warning Card Form 72 P.D. and he advised he understood his rights. He advised he and **Hale** (his girlfriend) had been in KC, KS in the area of 4th and Troup when they rented the van from a white couple for "heroin and meth". He stated he provided the drugs to the couple and they allowed he and **Hale** to leave with the vehicle. He stated they drove to the park located at 12th and Prospect Ave Kansas City, Jackson County, MO where **Hale** began speaking with his play cousins and he sat next to a tree and "shot up". He advised they then entered the van and drove to the Family Dollar and backed into a parking spot. He advised he went inside to get a bluetooth cord for the vehicle, came back to the van, discovered they already had a cord so went back in to return the purchased item, and returned to the van entering the driver seat. He stated police then pulled up in front of the van with guns drawn and pointed at them. He advised he exited the vehicle and ran leaving **Hale** in the passenger seat. He stated as he was running from the police he heard shots coming from behind him. He was asked if **Hale** was ever observed with a firearm while he was with her during the day or if he had a firearm at any point. He stated he nor **Hale** had firearms in the vehicle and advised he is a felon and not allowed to own or have a firearm. He was asked if his version of events would be given differently by anyone else and asked if the owners of the car would say anything different. He advised no and continued to state the van was a rental. He denied he and **Hale** had taken the van during an armed robbery/ carjacking. He was presented a Consent to Search Form 155 PD and signed it allowing detectives to obtain a sample of his DNA via a buccal swab, which he signed. The buccal swab was collected and placed into the 7th Floor Property Locker as evidence.

Hale was contacted at 2301 Holmes Street Kansas City, Jackson County, MO in regard to this investigation by Missouri Highway Patrol investigators and was read her Miranda Rights. She stated she understood her rights and agreed to provide a statement in regard to this investigation. **Hale** advised she had been picked up in KC, KS by suspect #2 in a van somewhere on 4th street and they drove to a park in Kansas City, Jackson County, MO where she talked to some of suspect #2 people. **Hale** stated they went to the Family Dollar where the shooting occurred and parked so suspect #2 could go get something from inside. **Hale** stated when suspect #2 got back into the driver side of the van she observed police pull up in front of the van and pointed guns at them. **Hale** stated suspect #2 exited the van and ran from the scene with officers chasing him and she got out of the passenger side of the vehicle with her hands up. **Hale** stated she then ran and saw the female officer who was telling her to stop and she continued to run with her hands up. **Hale** stated she then heard gunshots and knew she had been hit. **Hale** stated the female officer had shot her and made her put her hands behind her back, even though she was unable to move it. **Hale** denied ever having a gun or anything in her hands and advised she believed the officers approached them because someone must have told police the occupants were armed. **Hale**

PROBABLE CAUSE STATEMENT FORM

CRN KC22-035267

had nothing else to add and this part of the interview was concluded. KCPD Detectives entered the room with an active audio and video body worn camera activated. **Hale** was asked if she would mind speaking with detectives in regard to the above statement and she immediately requested a lawyer (prior to Miranda being read aloud); therefore **Hale** was never able to be questioned about the body camera footage captured from the officers involved.

Three spent shell casings head-stamped Speer 40 S&W were located in the area where the victim's discharged their firearms from and a black and silver Lorcin Model L25 serial # 296497 handgun was located where **Hale** stumbled prior to continuing into the east parking lot. The firearm dropped by **Hale** was observed to have one live 22 caliber round in the chamber as well as two live 25 caliber rounds in the magazine. The second firearm was located in the driver side door and determined to be a Glock 30 Gen 4, .45 caliber, Serial # BTFC676 with a laser sight. There was one live .45 caliber round located in the chamber and in the magazine (24 capacity) I observed 23 (twenty three) live .45 caliber rounds.

A search of Hale's criminal history shows two prior felony cases with three prior felony convictions out of the District Court of Johnson County, Kansas. District Court online records confirm that the felonies are as follows:

On or about August 21, 2020, the defendant was convicted of the felony of possession of methamphetamine and the felony of interference with a law enforcement officer in Case No. 19CR02085, and on or about April 4, 2018, the defendant was convicted of the felony of possession of methamphetamine in Case No. 17CR02775.

Printed Name Det. Jeremy D. Wells #5015 Signature /s/ Det. Jeremy D. Wells #5015

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

Judge

Circuit Court of _____ County, State of Missouri.