

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

Police# 15-000871  
Prosecutor# 095430140  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Collin J. Carter  
2141 SW Sterling Drive  
Lees Summit, MO 64081  
DOB: 09/10/1997; Race/Sex: W/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840909.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the class C felony of involuntary manslaughter in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Nathan Giron by driving at a high rate of speed, passing another vehicle in a no-passing zone and striking another vehicle while having a CNS depressant in his system.

**Count II. Involuntary Manslaughter 1st Degree (565.024-001Y19840909.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the class C felony of involuntary manslaughter in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of Courtney Rardin by driving at a high rate of speed, passing another vehicle in a no-passing zone and striking another vehicle while having a CNS depressant in his system.

The range punishment for a class C 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 five thousand dollars (\$5,000); or by both imprisonment and a fine.

**Count III. Assault 2nd Degree - Operate Vehicle While Intoxicated - Resulting In Injury  
(565.060-002Y19841399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.060, RSMo, committed the class C felony of assault in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about February 1, 2016, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of a CNS depressant and Benzodiazepine, a controlled substance, and acted with criminal negligence in that the defendant was passing in a no passing zone and caused physical injury to David Lartley by colliding his vehicle with the vehicle that David Lartley was operating.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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).

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.

**THE STATE OF MISSOURI**

vs.

**Collin J. Carter**

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,



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Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, Missouri 64050  
(816) 881-3856  
mhunt@jacksongov.org

**WITNESSES:**

PO John Easley , 10 NE Tudor, Lee's Summit, MO 64086

SGT Aaron Evans , 10 NE Tudor, Lee's Summit, MO 64086

Mark E. Fleming [REDACTED]

Kevin Garver [REDACTED]

Nathan Giron , , ,

PO Ben Griffin , 10 NE Tudor, Lee's Summit, MO 64086

David L. Lartey [REDACTED]

PO Aaron Paris , 10 NE Tudor, Lee's Summit, MO 64086

Michael Perkins , [REDACTED]

Courtney Rardin , , ,

Clint Sanders , [REDACTED]

Karen M. Sanders , [REDACTED]

# STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 01-16-0871

Date: 02-15-2016

OCN :

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 02-01-2016 at 1600 hours on SW Pryor Rd and SW Summit Hills Dr. city of Lee's Summit, County of Jackson, State of Missouri, Collin J. Carter, 09-10-1997, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 02-01-2016, a 2005 Nissan Sentra driven by Collin J. Carter was involved in a two car vehicle crash in the area of Pryor Rd and Summit Hills Dr. Lee's Summit Missouri. The result of the crash caused the death of Nathan R. Giron W/M, 10-10-1997 and Courtney T. Rardin W/M, 06-19-1997 who were both passengers in the vehicle driven by Carter. Davis L. Lartey was the driver of a 2013 Hyundai Sonata and received minor injuries from this crash.


Carter was northbound on Pryor Rd approaching Pryor Rd and Summit Hills Dr. Carter was driving at a high rate of speed estimated at 80-90 mph according to witness Clint R. Sanders. The posted speed limit in this area is 45 mph. Carter came up on Sanders' vehicle on Pryor Rd where Carter nearly struck the rear of Sanders vehicle. Carter then attempted to pass Sanders vehicle on a no pass double yellow line. Oncoming southbound traffic on Pryor Rd caused Carter to swerve back into the northbound lane causing him to begin losing control of his vehicle. Carter began fish-tailing in the northbound lane where he ultimately over-corrected causing his vehicle to swerve and slide across the center of the roadway and into the southbound lane where Carter's vehicle was struck by a vehicle driven by David L. Lartey.

The force of the crash caused Carter's vehicle to rotate clockwise into a ditch on the westside of Pryor Rd where it overturned. Lartey's vehicle came to rest in close proximity to Carter's vehicle with heavy damage.

Nathan R. Giron was a back seat passenger in Carter's vehicle and was pronounced dead at the scene by Lee's Summit Fire Department. Courtney T. Rardin was a front seat passenger in Carter's vehicle and transported from the crash scene to Centerpoint Hospital where he was pronounced dead. Collin J. Carter was transported from the scene with life threatening injuries. David L. Lartey sustained minor injuries and was transported from the scene.

A toxicology report from Research Medical Center obtained by subpoena showed that Carter tested positive for Benzodiazapine (a CNS Depressant) with an "H" indicator. "H" indicates high.

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

  
\_\_\_\_\_  
Signature (Police Officer)

**THE COURT FINDS PROBABLE CAUSE.**

\_\_\_\_\_  
DATE

\_\_\_\_\_  
JUDGE