

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

<b>POLICE NO. :</b>	17-003658
<b>PROSECUTOR NO. :</b>	095438739

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>JUAN L. SANCHEZ</b>	)	
<b>322 N. Denver Ave.,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64123</b>	)	<b>DIVISION</b>
<b>DOB: 03/11/1996</b>	)	
<b>Race/Sex: H/M;</b>	)	
<b>SSN: XXX-XX-XXXX</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Involuntary Manslaughter 1st Degree (565.024-001Y19840999.0)**

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 558.002 and 558.011, RSMo, in that on or about January 15, 2017, in the County of Jackson, State of Missouri, the defendant recklessly caused the death of [REDACTED] by pursuing [REDACTED] vehicle with defendant's vehicle causing [REDACTED] vehicle to go out of control and strike a pole.

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 three (3) years and not to exceed ten (10) years; 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 II. Armed Criminal Action (571.015-001Y19755299.0)**

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 January 15, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Involuntary Manslaughter charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Involuntary Manslaughter by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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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.

### **Count III. Assault 1st Degree Or Attempt (565.050-002Y19791305.0)**

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 January 15, 2017, in the County of Jackson, State of Missouri, the defendant drove his vehicle towards Abbas Alhashemi, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of Abbas Alhashemit 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 IV. Armed Criminal Action (571.015-001Y19755299.0)**

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 January 15, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count III, all allegations of which are incorporated herein 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 dangerous instrument.

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.

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**Count V. Leaving Scene Of Accident - Physical Injury (577.060-001Y20175401.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 577.060, RSMo, committed the **Class E Felony of Leaving the Scene of an Accident**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 15, 2017, the defendant, while operating a motor vehicle on St. John Ave, in the County of Jackson, State of Missouri, was involved in an accident that resulted in physical injury to [REDACTED] and damage to the property of [REDACTED] in excess of one thousand dollars, and the defendant knew that such accident had occurred, and defendant left the location of the accident without stopping and giving defendant's name, residential address, license number of defendant's vehicle, and operator's license number to the other party in the accident, a law enforcement officer in the vicinity, or to the nearest law enforcement agency.

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 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.

**Count VI. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y20175006.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **Class E Felony of Tampering with Physical Evidence**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 15, 2017, in the County of Jackson, State of Missouri, the defendant concealed a black truck by removing the license plates and covering the truck with a tarp with the purpose to impair its availability in an investigation, and thereby impaired and obstructed the prosecution of defendant for the felony of Involuntary Manslaughter.

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 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 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.

**State vs. Juan L. Sanchez**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Brady X. Twenter*  
Brady X. Twenter (#49380)  
Assistant Prosecuting Attorney  
415 East 12th Street 11th Floor  
Kansas City, MO - 64106  
BTwenter@jacksongov.org

**WITNESSES:**

[REDACTED]  
DET Kurtis J. Anderson, 1125 Locust, Kansas City, MO - 64106

[REDACTED]  
[REDACTED]  
DET Gary L. Burgess, 1125 Locust, Kansas City, MO - 64106

[REDACTED]  
[REDACTED]  
DET Christopher G. Hayes, 1125 Locust, Kansas City, MO - 64106  
PO Karl T. Janning, 1125 Locust, Kansas City, MO - 64106  
PO Walter W. Johnson, 1125 Locust, Kansas City, MO - 64106  
PO Jamie D. Lamb, 1125 Locust, Kansas City, MO - 64106  
DET Kevin D. Richardson, 1125 Locust, Kansas City, MO - 64106

[REDACTED]  
PO John W. Shipman, 1125 Locust, Kansas City, MO - 64106  
[REDACTED]

 **PROBABLE CAUSE STATEMENT FORM** 

Date: 03/23/2017

CRN: 17-003658

**I, Det. Gary Burgess #4441**

(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 01/15/2017, at St. John Avenue and Askew Avenue in

Kansas City, Jackson Missouri, Juan L Sanchez H/M 03/11/1996

(County)

(Name of Offender(s))

(Description of Identity)

committed one or more criminal offense(s).

**Vehicular Manslaughter/Vehicular Assault**

The facts supporting this belief are as follows:

On 01/15/2017 at 1936 hours, Kansas City, Missouri Police Officers were dispatched to St. John Avenue and North Brighton, Kansas City, Jackson County, Missouri in regard to a nature unknown. Shortly after, a 911 call was received in regard to a black Ford F150 chasing a black Dodge Charger and running the Charger off the road and causing it to strike a pole at St. John and Askew. The Ford then drove away south on Kensington. Several more calls were received regarding a black Dodge Charger wrecked into a pole. Officers responded to St. John and Askew and observed a black, 2011 Dodge Charger bearing Missouri license plate MM8G0A collided with a pole. The driver of the Dodge, Shaymaa Saudi (W/F, 10/16/1981) was transported to an area hospital where she died from injuries sustained in the crash. The back seat passenger, [REDACTED] (W/F, 02/03/2012) was also transported to an area hospital with serious injuries.

A Kansas City Missouri Police Detective contacted Abbas Alhashemi (W/M, 02/03/1984), the husband of SAUDI. ALHASHEMI stated he was with SAUDI and his daughter prior to the crash and he was driving the Dodge west on St. John Avenue. As he approached Denver Avenue, a black, 1998 Ford F-150 bearing Missouri license plate 8TA848, pulled out onto St. John in front of him and stopped. ALHASHEMI honked his horn at the Ford and it immediately backed up towards his vehicle. The driver/defendant of the Ford later identified as **Juan L Sanchez (H/M, 03/11/1996)** got out of the Ford and grabbed a rake, which was later determined to be a pitchfork, out the back of the truck and walked towards them. ALHASHEMI told SANCHEZ he didn't want any trouble and SANCHEZ got back into the Ford and drove west on St. John. A short distance later SANCHEZ stopped again and would not let ALHASHEMI pass him. SANCHEZ then backed the Ford into ALHASHEMI's Dodge, this time hitting it. SANCHEZ then got out of the Ford and again walked towards them with the pitchfork. ALHASHEMI and SAUDI got out of their car and SANCHEZ swung the pitchfork at both of them. ALHASHEMI confronted SANCHEZ and took the pitchfork away from him. SANCHEZ then got back into the Ford and drove away west on St. John then turned around and drove back east on St. John and nearly struck ALHASHEMI, who was standing in the roadway. As SANCHEZ drove past him, ALHASHEMI swung the pitchfork and broke out the passenger side window of the Ford. Per ALHASHEMI's demand, SAUDI got into the Dodge and drove away west on St. John Avenue. SANCHEZ continued to try and run over ALHASHEMI by driving around in circles and nearly up on the sidewalk after him. SANCHEZ then drove west on St. John and caught up to SAUDI, who was stopped at St. John Avenue and Elmwood Avenue, and rammed the rear of her vehicle. Both vehicles continued west on St. John and ALHASHEMI lost sight of them. ALHASHEMI walked west on St. John and got into a vehicle with his friend, ALTONI SATTAR, and they drove west on St. John Avenue to find SAUDI. As they were traveling west on St. John, they observed the Ford traveling back east on St. John without headlights. SATTAR turned his vehicle around and observed the Ford pull into a driveway just west of Jackson Avenue, on St. John Avenue.

Kansas City Missouri Detectives conducted an area canvas for surveillance video and recovered video from 4901 St. John Avenue. The surveillance video showed what appeared to be a black, two door Ford F150 driving erratically and attempting to run over a pedestrian in the roadway. The pedestrian appeared to be swinging an object at the truck. A small dark vehicle then drove away west on St. John and the truck soon followed.

Kansas City Missouri Detectives contacted SATTAR and he stated he was driving to a relative's house when he saw ALHASHEMI walking west on St. John Avenue near Van Brunt. ALHASHEMI got into his car and told him what happened and SATTAR drove him around and they looked for SAUDI. As they were driving west on St. John, ALHASHEMI saw the black Ford that was following his family and he told SATTAR to turn around and follow it. SATTAR turned around and he saw the Ford turn into a driveway between two houses just west of Jackson Avenue on the south side of St. John Avenue. SATTAR then drove them to the scene of the crash at St. John and Askew. The detectives drove SATTAR to the location he observed the Ford pull into and he pointed to the driveway for 4125 St. John Avenue.

Kansas City Missouri Detectives contacted [REDACTED] who called 911 when he observed a black two door Ford F150 chasing a black Dodge Charger west on St. John Avenue past his residence. [REDACTED] stated he was outside his residence at 3928 St. John Avenue when he observed the Ford chasing a Dodge at about 60 mph. The Dodge turned it's blinker on and tried to turn South onto Monroe, but the Ford drove into the oncoming lanes of traffic and it appeared it tried to perform a "pit maneuver" on the rear driver's side of the Dodge. The Dodge then lost control and drove up on the sidewalk just past the southwest corner of St. John and Monroe, then immediately drove northwest across St. John and [REDACTED] heard a loud crash.

A Kansas City Missouri Detective was contacted by a witness, [REDACTED]. He stated on 01/15/2017 at approximately 1930 hours, he observed a black Dodge Charger and a black Ford truck driving side by side at a high rate of speed west on St. John at Brighton. The Charger was in the outside #2 lane and the Ford was in the inside #1 lane. [REDACTED] observed the Charger attempt to change lanes in front of the Ford near St. John and Askew. The Ford struck the Charger as it changed lanes and the Charger then lost control and drove into the eastbound lanes of travel and struck the south side curb of St. John. The Charger then drove back into the westbound lanes of travel and struck the utility pole. The Ford did not stop at the crash scene.

Later that day ALHASHEMI contacted a Kansas City Missouri Police Detective and stated he found the Ford F150 in the driveway of 4125 St. John Avenue, under a tarp, and there was a Dodge truck parked in front of it. A search warrant was obtained and the Ford was towed to the City Tow Hold Lot.

Kansas City Missouri Detectives contacted witnesses [REDACTED] and [REDACTED] and they stated on 01/15/2017 sometime after 1900 hours, they were in their 2005 gold Ford Explorer traveling west on St. John. When they came to the intersection at St. John and Chelsea, they saw a black Ford F150 parked in the middle of the street and a Dodge Charger was behind it. As they drove around the vehicles, [REDACTED] observed the defendant trying to stab ALHASHEMI with a pitchfork. BROWN drove past the disturbance and made a U-turn at Van Brunt and stopped. They then saw the Ford drive around in circles, as if it were trying to do "donuts", near the intersection of St. John and Chelsea. The Charger then drove away west on St. John, stopped at the stop sign at Van Brunt, then continued westbound. As soon as the Charger got past Van Brunt, the Ford sped off after it and failed to stop at the stop sign at Van Brunt. [REDACTED] and [REDACTED] followed the two vehicles west on St. John. They thought the vehicles were driving about 50 MPH. As the Charger approached Monroe Avenue, it slowed down and the Ford drove to the left of the Charger into oncoming lanes of traffic. The Ford then swerved towards the left rear of the Charger, and did a "pit maneuver", which caused the Charger to lose control. [REDACTED] and [REDACTED] were about a half a block behind the vehicles when this occurred, and even though they could not positively say they saw contact, they believed the Ford's actions caused the Charger to lose control. As the Charger lost control, it entered the sidewalk on the south side of St. John and then shot across the intersection and hit a utility pole at St. John and Askew Avenue. The Ford kept driving west and a few blocks later made a left turn and headed south. AYERS called 911 and they continued following the

Ford. The Ford was travelling about 30 mph through the residential streets with its headlights off. It swerved, hit parked cars, drove the wrong way on one way streets, failed to stop for stop signs and cut through alleys. They thought it was obvious the defendant knew he was being followed and was trying to lose them. The 911 call taker told them to stop following the Ford, so they did. They then headed west on St. John from Jackson to check on the crash scene. Shortly after they entered St. John, they saw the Ford travelling east towards them and its headlights were turned off. [REDACTED] immediately made a U-turn and they watched the Ford turn into a driveway west of Jackson on the south side of St. John between the second and third house. The Ford then made a left turn and it disappeared behind the houses.

On 01/18/2017 Juan Sanchez's attorney contacted a Kansas City Missouri Detective and stated SANCHEZ wanted to voluntarily report to a police facility and give a statement. On 01/19/2017 at 1030 hours, SANCHEZ responded to a police facility and detectives read him his Miranda Rights and he advised he understood his rights and signed the waiver. SANCHEZ stated he left his residence at 322 N. Denver Avenue on 01/15/2017 sometime after 1900, but before 2000 hours, in his black, 1998 two door Ford F150, and he turned right (west) onto St. John from Denver. Soon after he entered St. John, a black unknown model car, which appeared to be driving fast, began riding close to the rear of his truck. He tried to let the vehicle pass him by pulling to the right, but instead of passing on the left side, the black car also pulled to the right. SANCHEZ thought the car hit his truck, so he pulled over near St. John and Brighton and confronted the male driver of the black car. The male was about to re-enter his car and SANCHEZ feared he was going to get a gun, so he grabbed a pitchfork out of the back of his truck. SANCHEZ told the man, "Hey man you keep following me, I'm gonna let you have it!" The man then backed away and a female then got out of the car and started yelling she was gonna call the police. SANCHEZ put the pitchfork back in his truck and just before he drove away, the man grabbed the pitchfork and broke SANCHEZ's driver's door window out. SANCHEZ drove away west and then then made a U-turn to go back east to his house on Denver. As he drove eastbound past the male, the male swung the pitchfork again and broke out the passenger door window of his truck. SANCHEZ stated, "hell no this dude fuckin broke both my fucking windows, hell no, they're not going to get away with it." SANCHEZ claimed he did not see the man in the street, so he assumed he got back into the black car. When he saw the car drive away west on St. John, SANCHEZ made two circles or "spins" in the street. After the second spin, he chased after the black car at about 40-50 mph. He said he wanted to catch up to it so he could get the vehicle's license plate number. When asked why he didn't call the police, SANCHEZ stated, "man, I don't call the police man." While SANCHEZ was chasing after the black car, he caught up to it near St. John and Elmwood. The black car slammed on its brakes and SANCHEZ could not stop his truck in time and he "tapped" the rear of the car. After the contact, the black car lost control and swerved into the eastbound lanes of St. John. The defendant also lost control of his truck but was able to stay in the westbound lanes and continued driving west on St. John. He claimed he lost sight of the black car at this point. The defendant then turned south on Bales and saw a car following him. He thought it was the same black car, so he tried to lose it. After he lost the vehicle that was following him, he drove his truck to his mother's house at 4125 St. John and parked it. The next day the defendant went back to 4125 St. John and put a tarp over his truck and took the license plates off. When asked why he took the license plates off the truck he responded, "just cause".

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Kansas City Missouri Police Accident Investigators conducted a crash scene examination and concluded the following:

SAUDI was involved in a separate incident that occurred at St. John and Elmwood. SAUDI was operating the Dodge at a speed of 52 MPH just prior to the collision and at a speed range of 60-81 MPH five seconds prior, until just prior to impact. SAUDI was either attempting to turn north on Askew or had lost control just east of the intersection, left the roadway and struck a metal traffic control signal.

Printed Name Det. Gary Burgess #4441 Signature Det. Gary Burgess #4441

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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.