

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

POLICE NO. :	17-081704
PROSECUTOR NO. :	095441376

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JOSIAH S. WRIGHT)	
6116 Tracy Ave.,)	CASE NO. 1716-CR
Kansas City, MO - 64110)	DIVISION
DOB: 10/04/1978)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
)	DEFENDANT.

COMPLAINT

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y19841306.0)**

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 A felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 19, 2017, in the County of Jackson, State of Missouri, the defendant acting either alone or in concert with Jonay Wright, knowingly caused serious physical injury to █████. by striking █████.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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. Josiah S. Wright

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Faiza H. Alhambra
Faiza H. Alhambra (#62280)
Assistant Prosecuting Attorney
415 East 12th Street Floor 7M
Kansas City, MO - 64106
(816) 881-3564
fhalhambra@jacksongov.org

WITNESSES:

DET Selvir Abidovic, 1125 Locust, Kansas City, MO - 64106
[REDACTED]

DET Sabrina K. Dean, 5301 E. 27th Street, Kansas City, MO - 64127

DET Joseph W. Fitzner , 7601 Prospect Ave., Kansas City, MO - 64132
[REDACTED]
[REDACTED]

[REDACTED] Jones, 1125 Locust, Kansas City, MO - 64106

DET Thomas P. Komoroski, 2256 Locust, Kansas City, MO - 64106
[REDACTED]
[REDACTED]

DET Naomi J. Vaughans, 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09-19-2017

CRN: 17-81704

I, Det Komoroski, Kansas City Missouri Police Department, Domestic Violence Section.
(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 09-19-2017, at 7000 E 111 ST in
(Date) (Address)

Kansas City, Jackson Missouri WRIGHT, JOSIAH
(County) (Name of Offender(s))

B/M, 10-04-1978 SSN: [redacted] committed one or more criminal offense(s).
(Description of Identity)

Domestic Assault

The facts supporting this belief are as follows:

On 09-19-2017 at 1215 hours, an officer of the Kansas City Missouri Police Department was working in an off-duty capacity at 7000 E 111 ST, Kansas City, Jackson County, Missouri when he was contacted regarding an assault. The officer located [redacted] on the floor unconscious. [redacted]s ex-girlfriend, JW, and her father WRIGHT, JOSIAH B/M 10-04-1978, had assaulted [redacted]

[redacted] was transported to an area hospital where he was in critical condition with a possible brain bleed and swelling. He was intubated and unable to provide a statement. Officers observed [redacted] to have severe abrasions to his right eye, swelling and bruising to his entire head and bleeding from his left ear.

Witness, [redacted] stated the following: On 09-19-2017 at about 1215 hours, he observed Wright and JW kicking and hitting [redacted] about the head and body as he was lying on the floor of the service room floor. [redacted] grabbed Wright to get him away from [redacted] but JW kept kicking [redacted]

Witness, [redacted] stated the following: On 09-19-2017 at about 1200 hours, she heard a disturbance in the student services area. She exited her office and observed Wright telling [redacted] "you threatened to kill my daughter. I'll fuck you up". Wright stomped [redacted]s head twice. [redacted] tried to hold Wright back while JW continued to kick [redacted] in his chest and groin.

Witness, [redacted] stated the following: On 09-19-2017 at about 1150 hours, he observed Wright and JW come into the student services area while [redacted] was seated at a table inside the room. Wright and JW left briefly but rushed back into room. Wright grabbed [redacted] by his hair while he was still seated and yanked him to the floor. Wright started stomping [redacted]s head. BKH ran to get help.

Witness, [redacted] stated the following: On 09-19-2017 at about 1200 hours, she observed Wright and JW enter the student services room and approach [redacted] [redacted] heard a loud noise and looked over to see Wright punching and kicking [redacted] on the floor. JW was also kicking [redacted] while he was on the floor. [redacted] wrestled Wright off of [redacted] while JW continued to kick [redacted]

PROBABLE CAUSE STATEMENT FORM

CRN 17-81704

Wright and JW were arrested on scene and transported to South Patrol Detention for questioning.

Wright was read his Miranda Rights and stated the following. He entered the student services area with his daughter JW to obtain her school schedule before eating lunch with her. Wright and JW observed JW's ex-boyfriend [redacted] seated inside the room. They exited but JW immediately received a threatening text from [redacted] causing them to return to the room to confront [redacted]. Wright pulled [redacted] off his chair in order to allow JW to assault him. Wright stated he held some other individuals back so JW could continue fighting [redacted] Wright denied kicking [redacted].

Printed Name Det.Komoroski #5579 Signature Det Komoroski 5579

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

Judge

Circuit Court of _____ County, State of Missouri.

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

POLICE NO. :	17-081704
PROSECUTOR NO. :	095441377

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JONAY L. WRIGHT)	
10820 Ewing Ave.,)	CASE NO. 1716-CR
Kansas City, MO - 64138)	DIVISION
DOB: 07/19/2000)	
Race/Sex: B/F;)	
SSN: XXX-XX-████)	
)	DEFENDANT.

COMPLAINT

Count I. Domestic Assault - 2nd Degree (565.073-003Y20171399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.073, RSMo, committed the class D felony of domestic assault in the second degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 19, 2017, in the County of Jackson, State of Missouri, the defendant acting either alone or in concert with Josiah Wright, knowingly caused physical injury to █████. by striking █████ and █████ and defendant were family or household members in that █████ and the defendant were or had been in a continuing social relationship of a romantic or intimate nature.

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 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.

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. Jonay L. Wright

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Faiza H. Alhambra
Faiza H. Alhambra (#62280)
Assistant Prosecuting Attorney
415 East 12th Street Floor 7M
Kansas City, MO - 64106
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WITNESSES:

DET Selvir Abidovic, 1125 Locust, Kansas City, MO - 64106

[REDACTED]
DET Sabrina K. Dean, 5301 E. 27th Street, Kansas City, MO - 64127

DET Joseph W. Fitzner, 7601 Prospect Ave., Kansas City, MO - 64132

[REDACTED]
[REDACTED]
PO Wayne Jones, 1125 Locust, Kansas City, MO - 64106

DET Thomas P. Komoroski, 2256 Locust, Kansas City, MO - 64106

[REDACTED]
[REDACTED]
DET Naomi J. Vaughans, 1125 Locust, Kansas City, MO - 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09-19-2017

CRN: 17-81704

I, Det Komoroski, Kansas City Missouri Police Department, Domestic Violence Section.
(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 09-19-2017, at 7000 E 111 ST in
(Date) (Address)

Kansas City, Jackson Missouri WRIGHT, JONAY
(County) (Name of Offender(s))

B/F, 07-19-2000 committed one or more criminal offense(s).
(Description of Identity)

Domestic Assault

The facts supporting this belief are as follows:

On 09-19-2017 at 1215 hours, an officer of the Kansas City Missouri Police Department was working in an off-duty capacity at 7000 E 111 ST, Kansas City, Jackson County, Missouri when he was contacted regarding an assault. The officer located [redacted] on the floor unconscious. [redacted]s ex-girlfriend, WRIGHT, JONAY B/F 07-19-2000, and her father JW, had assaulted [redacted].

[redacted] was transported to an area hospital where he was in critical condition with a possible brain bleed and swelling. He was intubated and unable to provide a statement. Officers observed [redacted] to have severe abrasions to his right eye, swelling and bruising to his entire head and bleeding from his left ear.

Witness, [redacted] stated the following: On 09-19-2017 at about 1215 hours, he observed Wright and JW kicking and hitting [redacted] about the head and body as he was lying on the floor of the service room floor. [redacted] grabbed JW to get him away from [redacted] but Wright kept kicking [redacted].

Witness, [redacted] stated the following: On 09-19-2017 at about 1200 hours, she heard a disturbance in the student services area. She exited her office and observed JW saying "you threatened to kill my daughter. I'll fuck you up". JW stomped [redacted] head twice. [redacted] tried to hold JW back while Wright continued to kick [redacted] in his chest and groin.

Witness, [redacted] stated the following: On 09-19-2017 at about 1150 hours, he observed Wright and JW come into the student services area while [redacted] was seated at a table inside the room. Wright and JW left briefly but rushed back into room. JW grabbed [redacted] by his hair while he was still seated and yanked him to the floor. JW started stomping [redacted]s head. [redacted] ran to get help.

Witness, [redacted] stated the following: On 09-19-2017 at about 1200 hours, she observed Wright and JW enter the student services room and approach [redacted]. [redacted] heard a loud noise and looked over to see JW punching and kicking [redacted] while he was on the floor. Wright was also kicking [redacted]. [redacted] wrestled JW off of [redacted] while Wright continued to kick [redacted].

PROBABLE CAUSE STATEMENT FORM

CRN 17-81704 _____

Wright and **JW** were arrested on scene and transported to South Patrol Detention for questioning. **Wright** was read her Miranda Rights and refused to make a statement.

Printed Name Det.Komoroski #5579 Signature Det Komoroski 5579

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

Judge

Circuit Court of _____ County, State of Missouri.