

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

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| POLICE NO. : | 18-026382 |
| PROSECUTOR NO. : | 095444948 |
| OCN: | hs001871 |

| | | |
|------------------------------|---|-------------------------|
| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| |) | |
| RYAN M LILLY |) | |
| 521 Madison Avenue |) | CASE NO. 1816-CR |
| Kansas City, MO 64105 |) | DIVISION |
| DOB: 12/02/1985 |) | |
| Race/Sex: W/M |) | |
| ████████████████████ |) | |
| |) | DEFENDANT. |

COMPLAINT

Count I. Assault - 3rd Degree - Special Victim (565.054-001Y20171399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the class D felony of assault in the third degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 9, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to ██████████ ██████████ a law enforcement officer and special victim, by means of driving his truck into a vehicle occupied by ██████████.

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 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 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).

Count II. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20172902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2),

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RSMo, committed the **class D felony of tampering in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 9, 2018, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a motor-propelled vehicle, a 2005 Dodge Ram 1500.

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. 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 April 9, 2018, in the County of Jackson, State of Missouri, Aaron E. Benson, a law enforcement officer, 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 officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, resisted the stop of defendant by fleeing from the officer and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons, in that defendant drove his vehicle into another, occupied vehicle to resist the stop and weaved in and out of traffic to avoid being stopped.

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 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 IV. Property Damage 1st Degree (569.100-001Y20172999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the class D felony of property damage in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 9, 2018, in the County of Jackson, State of Missouri, the defendant knowingly damaged a police vehicle occupied by Aaron E. Benson around 34th and Lawndale, which property was possessed by

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Aaron E. Benson, by striking the police vehicle with a 2005 Dodge Ram he was driving, and the damages to such property exceeded seven hundred and fifty dollars.

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 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Sean T. Foley
Sean T. Foley (#64851)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-4308
STFoley@jacksongov.org

WITNESSES:

1. [REDACTED]
2. DET Eric J. DeValkenaere, 1125 Locust, Kansas City, MO 64106
3. PO Daniel Dorr, 1125 Locust, Kansas City, MO 64106
4. PO Mark A. Ising, 1125 Locust, Kansas City, MO 64106
5. Board of Missouri Board of Police Commisioners, 1125 Locust, Kansas City, MO 64106
6. PO Jacob M. Moore, 1125 Locust, Kansas City, MO 64106
7. PO Chad E. Pfaff, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 4-10-2018

CRN: 18-26382/18-26303

I, Detective Adam Hill #4736 (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 4-9-2018, at 10615 Blue Ridge Blvd in (Date) (Address)

Kansas City, Jackson Missouri Ryan M. Lilly (County) (Name of Offender(s))

white/male, 12-2-1985 committed one or more criminal offense(s). (Description of Identity)

- 565.054 Assault in the 3rd Degree (assault of "Special Victim", D Felony)
569.080 Tampering in the 1st Degree (D Felony)
575.150 Resist Arrest Eluding (E Felony)
569.100 Property Damage in the 1st Degree (E Felony)

The facts supporting this belief are as follows:

On 4-9-2018 at 1550 Kansas City Missouri Police Officers were on patrol in the area Linwood and Indiana, Kansas City, Jackson County, Missouri. Officers had been alerted by stationary cameras a stolen white 2005 Dodge Ram 1500, Missouri license 3LA183, was in the area traveling east on Linwood. The Dodge was stolen on CRN#18-26303.

While conducting an area canvass officers located the vehicle traveling east near 31st Street and York. Detectives in unmarked vehicle began to follow the Dodge east on 31st Street. The Dodge continued east on 31st street then north on Stadium Drive. Detective followed the vehicle to 34th Terrace and Lawndale where the Dodge stopped in the street. The driver later identified as Ryan M. Lilly, white/male 12-2-1985, exited the vehicle and changed clothes. Officers in marked patrol vehicles moved into the area to conduct a car check. Lilly reentered the vehicle and drove south on Lawndale where he observed the marked patrol vehicles. Lilly put the Dodge in reverse and accelerated at the high rate of speed to get away from the officers. Lilly drove approximately 500 yards in reverse on Lawndale until he struck a tree. Lilly put the Dodge in drive and accelerated forward intentionally striking the front of the marked police vehicle being driven by [redacted] who followed Lilly up Lawndale using red lights and sirens. Following the impact the impact, Lilly pushed the police vehicle out of the way and fled the area in the Dodge.

Lilly continued to flee the scene in the Dodge as marked patrol vehicles attempted to stop him. Lilly refused to stop and led officers on a pursuit. The pursuit went west bound on I-70 leaving Kansas City, Missouri into Kansas City, Kansas. The pursuit continued from Kansas City, Kansas into Lenexa, Kansas reaching speed of 85pmh to 100pmh. During the pursuit a white female passenger identified as [redacted], white/female, 11-28-1982, exited the vehicle on foot and was taken into custody by Lenexa Kansas Police officers on CRN#18-

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10860. Lilly was weaving in and out of traffic, and driving into oncoming lanes of traffic, creating a substantial risk to other motorists on the roadways. The pursuit lasted approximately 45 minutes before Lilly pulled over at I-435 and Wornall Road, Kansas City, Jackson County, Missouri. Lilly was taken into custody. A computer check of the VIN#1D7HU18D95S269703 revealed it was stolen from the area of Butler Way and State Line Road, Kansas City, Jackson County, Missouri on CRN#18-26303.

The owner (David Johnson) of the Dodge truck was contacted and stated he wished to press charges. The Dodge was valued at \$11,500.00. Johnson stated he did not give anyone permission to take his vehicle.

The damage caused to the police vehicle [redacted] was operating that was struck by Lilly was estimated to have sustained approximately \$7000 in damage. [redacted] has stated that he interrupted Lilly's actions of striking his police vehicle as being intentional as Lilly made no attempt to steer away from Sgt. Benson's vehicle in an attempt to avoid striking it.

On 4-9-2018, Lilly was read his Miranda Rights. Lilly stated that he ran from the police in the Dodge truck. Lilly stated that he knew the truck was stolen, and did not want to go back to jail on his outstanding felony warrants. Lilly stated that he struck the police car, and all he was thinking about was getting away. Lilly stated he stole the motorcycle that was in the back of the truck. Lilly admitted he ran from officers earlier in the day near Independence Avenue. Lilly stated his girlfriend (Angela Sublett) had nothing to do with this.

Printed Name Det. Eric DeValkenaere #4810 Signature Det. Eric DeValkenaere #4810

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

Judge

Circuit Court of _____ County, State of Missouri.