


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	18-041235
PROSECUTOR NO. :	095445855
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
VICTORIA M. BROWN)	
1258 Bennington Ave.)	CASE NO. 1816-CR
Kansas City, MO 64126)	DIVISION
DOB: 11/25/1993)	
Race/Sex: W/F)	
)	
	DEFENDANT.)

COMPLAINT

Count I. 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 June 1, 2018, in the County of Jackson, State of Missouri, P.O. Rapp and P.O. Stauch law enforcement officers, were attempting to make a lawful stop of a vehicle being operated by defendant, and the defendant knew or reasonably should have known that the officers were making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that defendant operated a motor vehicle on 23rd Street at high speeds not yielding to other traffic.

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.

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Count II. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 1, 2018, in the County of Jackson, State of Missouri, Shawn O Johnson was killed by being hit by a blue Jeep as a result of the perpetration of the class E felony of resisting a lawful stop by fleeing under Section 575.150, RSMo committed by the defendant on or about June 1, 2018, in the County of Jackson, State of Missouri.

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 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.

Count III. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 1, 2018, in the County of Jackson, State of Missouri, Aaron C Daniel was killed by was being hit by a blue Jeep as a result of the perpetration of the class E felony of resisting a lawful stop by fleeing under Section 575.150, RSMo committed by the defendant on or about June 1, 2018, in the County of Jackson, State of Missouri..

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 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.

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Count IV. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **class A felony of murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 1, 2018, in the County of Jackson, State of Missouri, Amanda N. Perry was killed by being in a blue Jeep operated by the defendant that collided with another vehicle as a result of the perpetration of the class E felony of resisting a lawful stop by fleeing under Section 575.150, RSMo committed by the defendant on or about June 1, 2018, in the County of Jackson, State of Missouri.

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 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.

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/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3856
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WITNESSES:

1. DET Gary L. Burgess,
2. Aaron C Daniel, 7310 Harry Truman Dr, Grandview, MO 64030
3. Shawn O Johnson, 6008 E 98th Street, Kansas City, MO 64130
4. Amanda N. Perry, 17311 E. 40 Hwy, Independence, MO 64055
5. PO Dustin Rapp, 223 N. Memorial Drive, Independence, MO 64050
6. PO Jeremie Stauch, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT FORM

Date: 06/02/2018

CRN: 18-041235

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 06/01/2018, at 23rd Street and Television Place in

Kansas City, Jackson Missouri, Victoria M Brown W/F, 11/25/1993

(County)

(Name of Offender(s))

(Description of Identity)

committed one or more criminal offense(s).

Vehicular Manslaughter/Resist Arrest/Tampering w/ Motor Vehicle

The facts supporting this belief are as follows:

On 06/01/2018 at about 1553 hours, Independence Missouri Police Officers Stauch and Rapp were on patrol in the area of 23rd Street and Ralston Avenue, Independence, Jackson County, Missouri. The officers observed a blue, Jeep Patriot traveling west on 23rd Street and turn south onto Hardy Avenue. The officers recognized the Jeep as one they knew from a nightly activity log and e-mails to be stolen on 05/30/2018. The officers got behind the Jeep in the area of Westport Road and Maywood Avenue after they observed it fail to stop for a stop sign. The officers made a computer inquiry of the Jeep's Missouri license plate AK0F7D, and it responded to a Chevrolet. The Jeep then turned north onto Cedar Avenue and accelerated, exceeding the posted speed limit, in an attempt to elude the officers prior to them activating their emergency equipment. The officers then activated their lights and sirens in order to conduct a car check, but the Jeep accelerated and refused to stop. The Jeep drove over the median and turned west onto 23rd Street at a high rate of speed. The officers were driving 90 MPH and still not gaining distance on the Jeep, they were about 200-300 yards behind it. The officers lost sight of the Jeep as they drove around a curve in the road east of 23rd Street and Television Place, Kansas City, Jackson County, Missouri. As soon as the officers made it around the curve they observed the Jeep had collided with a silver Dodge Avenger. The Jeep was near the north shoulder of 23rd Street and the Dodge was on its top in the grass to the north of 23rd Street. Two of the four occupants inside the Dodge, Shawn Johnson (b/m, 06/16/1987) and Aaron C Daniel (b/m, 10/11/1988) were pronounced dead at the scene and two other passengers were transported to area hospitals with serious/life-threatening injuries. The driver/defendant of the Jeep, Victoria M Brown (w/f, 11/25/1993), was pinned in the driver's seat and removed by emergency personnel, then transported to Centerpoint Medical Center with serious injuries. The front passenger side occupant of the Jeep, Amanda N Perry (w/f, 10/17/1990), was pronounced dead at the scene and the other two occupants of the Jeep were transported to area hospitals with serious/life-threatening injuries.

A computer check revealed Victoria Brown to have a valid Missouri operator's license.

Printed Name Det. Gary Burgess #4441

Signature [Handwritten Signature]

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

Judge

Circuit Court of ___ County, State of Missouri.