

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

Police #07-4516
Prosecutor #0990068
CASE# 0716-CR
OCN#

COMPLAINT

THE STATE OF MISSOURI

vs.

William K. Johnson
AKA Stoney Johnson; Willie J. Johnson; Willie Joe Johnson, Jr.
13508 Applewood
Grandview, MO 64030
DOB:8/8/1958; Race/Sex: BLK/M;
SS# [REDACTED]

Defendant.

Count I. Involuntary Manslaughter (1005110)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William K. Johnson**, in violation of Section 565.024, RSMo, committed the **Class C Felony of Involuntary Manslaughter**, punishable upon conviction under section 558.011 and 560.011, RSMo, in that on or about the 6th day of August, 2007, in the County of Jackson, State of Missouri, the defendant, William K. Johnson, recklessly caused the death of Larry Gaunt by striking him with his truck.

Count II. Involuntary Manslaughter (1005110)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William K. Johnson**, in violation of Section 565.024, RSMo, committed the **Class C Felony of Involuntary Manslaughter**, punishable upon conviction under section 558.011 and 560.011, RSMo, in that on or about the 6th day of August, 2007, in the County of Jackson, State of Missouri, the defendant, William K. Johnson, recklessly caused the death of Sierra Gaunt by striking Sierra Gaunt with his truck.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts concerning this matter which statement(s) are made a part hereof and are submitted herewith as a basis upon which this court may find the existence of probable cause for the issuance of the warrant.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

Grandview Police Report 0704516

PROBABLE CAUSE STATEMENT

Date: August 09, 2007

I, **Lorrie Whitehead**, a detective with the Grandview, Missouri Police Department, upon my oath and under penalties of perjury, state as follows:

- 1) I have probable cause to believe that, **Johnson, William K.**, b/m, 08-08-58, ssn. 489-66-4347, committed one or more criminal offenses.
- 2) The facts supporting this belief are as follows:

On 08-06-07 at approximately 1814 hours, Officers M. Dobbs and S. King were dispatched to Harry Truman and Raytown Road, Grandview, Jackson County, Missouri on an injury motor vehicle accident involving two bicyclists. Upon arrival, Officer M. Dobbs observed Grandview Medics performing CPR on a white male subject, who was identified as, Gaunt, Larry C. (W/M 02-03-07) who was later pronounced dead at the scene. A second victim on scene was identified as Gaunt, Sierra E. (W/F 05-03-93) who was medically evacuated to Overland Park Regional Hospital and later died as a result of the accident. Officer Dobbs was joined on scene by Sgt. G. Pruitt and Officer S. Evans of the Grandview Traffic Unit for accident reconstruction. Sgt. Pruitt was advised that a subject, identified as Johnson, William K. (B/M 08-08-58) was driving a blue truck northbound on Raytown Road and struck the bicyclists who were also northbound on Raytown Road.

Detective Smith then interviewed Johnson in regard to the accident. Johnson said he was northbound on Raytown Road, south of Harry Truman, when he observed two subjects riding bicycles on the right shoulder of the roadway. Johnson said he was driving on the inside lane of traffic, which he indicated was the right side of the roadway, and was driving approximately 45 mph. Johnson said as he drove closer to the bicyclists they were traveling side by side on the shoulder. Johnson said that the subject riding the bike closest to the roadway suddenly swung out into his lane of traffic, and he locked up his brakes in order to avoid hitting the subject. Johnson said he then panicked and swerved right causing him to strike the bicyclist in the back with the front end of his truck. Johnson said as he skidded to a stop he then struck the second bicyclist who followed the first subject out into the roadway.

Three witnesses were contacted at the scene and stated that the bicyclists were traveling northbound in the right hand lane prior to being struck by the blue truck being driven by William Johnson.

The results of Officer Scott Evans accident reconstruction revealed that the minimum speed of the 1985 Chevrolet pick up truck (driven by William K. Johnson) was 54 miles per hour in a 45 mile per hour zone, that Johnson's vehicle drifted off the roadway due to inattention, and that Johnson overcompensated causing the truck to skid before impact with the bicycles.

Grandview (SRN 0704516)
PD

The Court finds Probable Cause

Signature Det. Lorrie Whitehead
Detective Lorrie Whitehead

Judge _____
Date _____