

INFORMATION FOR MISDEMEANOR
IN THE CIRCUIT COURT OF CLAY COUNTY, MISSOURI
ASSOCIATE DIVISION

STATE OF MISSOURI)
)
COUNTY OF CLAY)

NO. 12CY-CR0

Div.

THE STATE OF MISSOURI,)
)
) vs.) Plaintiff.)

Megan M. Laffoon W/F 10/24/1982)

)
) Defendant.)

PA No. 047293769

Kate Elizabeth Noland, Assistant Prosecuting Attorney, Clay County, Missouri, being duly sworn, charges that the defendant,

COUNT: I

Charge Code: 1311799.0

In violation of Section 565.083, RSMo, committed the class A misdemeanor of assault of a law enforcement officer in the third degree, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about February 8, 2012, in the county of Clay, State of Missouri, the defendant recklessly caused physical injury to Jeffery Huff, a law enforcement officer, by scratching him.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed one thousand dollars (\$1,000); 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

Charge Code: 1312699.0

In violation of Section 565.083, RSMo, committed the class A misdemeanor of assault of a law enforcement officer in the third degree, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about February 8, 2012, in the county of Clay, State of Missouri, the defendant knowingly caused physical contact with Officer Taylor, a law enforcement officer, without the consent of Officer Taylor, by head butting him.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed one thousand dollars (\$1,000); 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: III

Charge Code: 4742004.0

In violation of Section 577.010, RSMo, committed the class B misdemeanor of driving while intoxicated, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about February 8, 2012, on North Oak Trafficway & NE 106th Street, Kansas City, in the County of Clay, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol.

The range of punishment for a class B misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed six (6) months; by a fine not to exceed five hundred dollars (\$500); 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: IV

Charge Code: 2704099.0

In violation of Section 575.150, RSMo, committed the class A misdemeanor of resisting an arrest, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about February 8, 2012, in the county of Clay, State of Missouri, Trooper [REDACTED] a law enforcement officer, was making an arrest of defendant, and the defendant knew that the officers was making an arrest, and, for the purpose of preventing the officer from effecting the arrest, resisted the arrest of defendant by using or threatening the use of violence, physical force or physical interference.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed one thousand dollars (\$1,000); 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).

Kate E. Noland
Assistant Prosecuting Attorney

Kate Elizabeth Noland, Assistant Prosecuting Attorney, Clay County, Missouri, being duly sworn that the facts set forth in said complaint are true, according to his best information, knowledge and belief.

Kate E. Noland
Assistant Prosecuting Attorney

Subscribed and sworn to before me this _____ day of _____, 20_____.

Division Clerk

Witnesses:
TPR Jeffery W Huff, Troop A Missouri State Highway Patrol, 504 E. Blue Parkway,
Lee's Summit, MO 64063

Bond Set:

Probable Cause Statement Form

Date: 02/08/2012

I, Jeffrey W. Huff, knowing that false statements on this form are punishable by law, state the facts contained herein are true.

1. I have probable cause to believe that on 02/08/2012, at the intersection of North Oak Trafficway and 106th Street, Kansas City, Clay County, Missouri, Megan M. Laffoon, 10/24/1982, White, Female, Social Security [REDACTED], 5'07", 165 lbs. committed one or more criminal offense(s). 577.010-Driving While Intoxicated, 565.083 - Assault of a law enforcement officer in the third degree, 575.150- Resisting Arrest or Interfering with Arrest/Detention/Stop

2. The facts supporting these beliefs are as follows:

On Wednesday, February 8, 2012 at approximately 0300 hours, I observed a black Ford Explorer traveling north on North Oak Trafficway. The Explorer traveled out of its lane multiple times, before traveling up on the curb which separates the northbound and southbound lane of traffic on North Oak Trafficway. The vehicle returned to its lane, but again traveled out of its lane. The Explorer then began to travel down the center portion of the divided street.

After conducting a traffic stop on the vehicle, the driver identified herself as Megan M. Laffoon. I could smell a strong odor of intoxicants emitting from the vehicle and Laffoon's speech was slurred. I had Laffoon exit her vehicle and sit in my patrol car. I administered the Horizontal Gaze Nystagmus Test, and noticed all 6 clues. Once outside of my patrol car, I administered the Walk and Turn Test, and Laffoon displayed every clue on the test. I attempted to administer the One Leg Stand Test, but Laffoon was unable to complete the test. Laffoon was unable to stand in one location and I stopped her from completing the test to prevent possible injuries from falling. I informed Laffoon that she was under arrest for Driving While Intoxicated and she instantly became enraged. Laffoon refused to place her hands behind her back and continued to pull away from me. After several attempts to place handcuffs on Laffoon, I had to use force and take Laffoon to the ground. Laffoon began to fight all the attempts I made to gain control of her. During the struggle, Laffoon scratched the right side of my neck with her fingernails. Laffoon continued to ignore my instructions to stop resisting and place her hand behind her back. In an attempt to gain control, I administered my OC Spray. The OC Spray was effective, yet Laffoon continued to fight. I was finally able to gain control of Laffoon and was able to place her in handcuffs once backup arrived.

After Laffoon was in custody, she continued to ignore orders from myself, as well as, Kansas City PD, and Clay County Deputies. At one point, Laffoon headbutted Officer [REDACTED], a Kansas City Missouri Police Officer, as he was attempting to seatbelt her into their transport van. Once at the Clay County Detention Center, approximately 7 deputies had to force Laffoon into a restraint chair.