

FILED  
BOONE COUNTY  
DEC 30 2019  
CHRISTY BLAKEMORE  
CLERK CIRCUIT COURT, COLUMBIA, MO

IN THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI

STATE OF MISSOURI

Plaintiff

vs.

Court Case No. **19BA-CR05786**

ANDRIA ELIZABETH HEESE

Offense Cycle No.

Address 600 Walnut St  
Columbia, MO 65202

PA Case No. 029139008

Race White DOB [REDACTED]  
Sex Female SSN [REDACTED]  
Height 5'01" OLN S211228017 MO  
Weight 115 lbs. Eyes BR Hair

Defendant

**COMPLAINT**

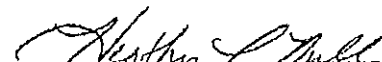
Charge Code Number: 565.024-001Y198409.0 09

The Prosecuting Attorney of the County of Boone, State of Missouri, charges that the defendant, in violation of Section 565.024, RSMo, committed the class C felony of involuntary manslaughter in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 4, 2019, in the County of Boone, State of Missouri, the defendant recklessly caused the death of G.C. by running G.C. over with a vehicle after entering an area typically used by pedestrians at a speed and coming from an angle which prevented her from avoiding G.C..

The facts that form the basis for this information and belief are contained in the attached statement 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 or a summons be issued as provided by law.

Prosecuting Attorney for the  
County of Camden, State of Missouri

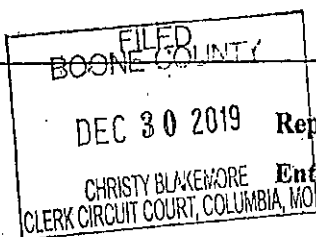
  
Heather L. Miller, Bar No. 65571

**RANGE OF PUNISHMENT**

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; or by a fine not to exceed ten thousand dollars (\$10,000), or if money or property has been gained through the commission of the crime, a fine of not more than double the amount of the offender's gain from the commission of the crime; or by both imprisonment and a fine.

Incident: 190006730

## General report:



19BA-CR05786

Author: #1115 PEMBERTON, G.

Report time: 2019/01/04 15:56

Entered by: #52859 KEMPKER, M.

Entered time: 2019/01/31 14:30

## Remarks:

## Narrative:

1. On January 4, 2019, I investigated a fatal motor vehicle crash involving a pedestrian. The crash occurred in the parking lot of Battle High School, located at 7575 East St. Charles Road, Columbia, Missouri 65202.

2. On January 4, 2019, at approximately 1555 hours, I was traveling east on Interstate 70, at the 127 mile-marker, in Boone County. On my patrol car's in-car scanner, I overheard a Columbia Police Officer, later identified as Andria E. Heese, date of birth [REDACTED], requesting emergency assistance at Battle High School, located at 7575 East St. Charles Road, Columbia, Missouri 65202. I informed Troop F Radio a Columbia Police Officer was requesting emergency assistance. I asked Troop F Radio to obtain further information. I activated my patrol car's emergency lights and siren and responded to Battle High School. I arrived at Battle High School parking lot at approximately 1600 hours. Two Boone County Deputies were traveling directly behind me. Troop F Radio informed me a young child was struck by a vehicle, and an officer was performing Cardiopulmonary Resuscitation (CPR) on the child. As I arrived at Battle High School, I overheard Boone County Joint Communications asked Officer Heese to explain her location. Officer Heese indicated she was near the student entrance by the school buses. At approximately 1601 hours, I located Officer Heese on the sidewalk near a roundabout at the student entrance of Battle High School. I observed Officer Heese performing chest compressions on a young female, later identified as Gabrielle Curry, date of birth December 1, 2014. I observed a marked Columbia Police Department vehicle, a 2015 Chevrolet Tahoe bearing registration 837, parked on the sidewalk near Officer Heese. The Chevrolet was facing northwest and was stopped several feet ahead of where Gabrielle Curry was laying.

3. I parked my patrol car in the circle drive and ran to Officer Heese. Several white females, who identified themselves as school nurses, were standing near Officer Heese. I observed an automated external defibrillator device attached to Gabrielle Curry's chest. I observed a large amount of blood on Gabrielle Curry's face. Gabrielle Curry was not breathing. The automated external defibrillator performed a rhythm check. No shock was advised, and the automated external defibrillator indicated to continue chest compressions. Using my right hand, I performed chest compressions on Gabrielle Curry. After approximately one minute, the Columbia Fire Department arrived at the scene. I explained to the Columbia Firefighters Gabrielle Curry had been struck by a vehicle, was not breathing, and did not have a pulse. I continued chest compressions. Paramedics with University of Missouri Hospital Ambulance arrived at the scene. Columbia Fire Department and University Hospital Ambulance personnel assumed care of Gabrielle Curry. In total, I performed approximately one cycle of CPR on Gabrielle Curry.

4. Columbia Police Lieutenant Geoff Jones informed me Gabrielle Curry had been struck by the Chevrolet driven by Officer Heese, and it was likely the Columbia Police Department would request the Missouri State Highway Patrol to investigate the crash. Gabrielle Curry was loaded into the ambulance. I observed a white male, later identified as Aaron M. Curry, standing with a group of people. I observed Mr. Curry sobbing. I asked a nearby Columbia Police Officer if Mr. Curry was related to Gabrielle Curry. The Columbia Police Officer indicated Mr. Curry was Gabrielle Curry's father. I approached Mr. Curry and informed him Gabrielle Curry was being transported to the University of Missouri Hospital. Mr. Curry asked, "Is she responding yet?" I told Mr. Curry I did not know, and again informed him she was being transported to the University of Missouri Hospital. I asked Mr. Curry if he had a way to travel to the hospital, and he indicated he did. Mr. Curry began walking toward the Battle High School parking lot. The ambulance departed the scene. I secured the crash area with scene tape. Columbia Police Lieutenant Geoff Jones informed me he was requesting the Missouri State Highway Patrol investigate the crash. I called Master Sergeant M. Broniec and informed him of the situation. After I secured the crash scene with scene tape, I was unable to locate Officer Heese. I asked Boone County Deputy T. Lorange if Officer Heese was still at the scene, and he indicated he thought she was. I asked Deputy Lorange to try to locate Officer Heese while I contacted witnesses.

5. The first witness I spoke to was [REDACTED] was sitting in a school bus when I approached her. I

introduced myself to [REDACTED] and asked her to explain to me the situation. [REDACTED] indicated she was driving a school bus in the roundabout and observed the crash occur. [REDACTED] said, "I was just driving up around the roundabout. She came up the ramp and hit her." Ms. [REDACTED] said she honked the school bus' horn to try to get Officer Heese's attention. [REDACTED] indicated she observed Officer Heese perform chest compressions on Ms. Curry. [REDACTED] said she was driving the school bus I contacted her in.

6. The second witness I spoke to was [REDACTED], a school monitor. [REDACTED] was standing outside, near the Battle High School student entrance. I introduced myself to [REDACTED] and asked him to explain to me the situation. [REDACTED] said, "I was sitting where I usually do near the entrance, inside the school. Officer Corey Dawkins was standing next me. We were just talking. Bus 44 pulled around. The cop car came up the drive as well. 44 slammed on her brakes, and the little girl was on the ground."

7. Sergeant Broniec arrived at the scene and informed me the Missouri State Highway Patrol Major Crash Investigation Unit was en-route. I spoke to [REDACTED], who was standing nearby. [REDACTED] indicated he was a supervisor with Student Transportation of America. [REDACTED] said both of Gabrielle Curry's parents were school bus drivers employed by Student Transportation of America. [REDACTED] said Gabrielle Curry's mother was Cheyenne R. Curry. [REDACTED] said Gabrielle Curry was riding with Cheyenne Curry on her bus route today. I asked [REDACTED] if parents were allowed to bring their children with them on their bus routes, and he indicated they were. [REDACTED] said it is within Student Transportation of America policy for parents to bring their young children with them so they do not incur additional child care expenses. [REDACTED] provided me his name and cell phone number.

8. Sergeant P. Meyers with the Major Crash Team arrived at the scene. I approached Sergeant Broniec and informed him Officer Heese did not appear to be at the scene. Columbia Police Lieutenant Jones was standing next to Sergeant Broniec, and he indicated Officer Heese was transported to the Columbia Police Department headquarters by another officer. Lieutenant Jones informed me a Fraternal Order of Police attorney was with Officer Heese. I informed Lieutenant Jones I needed to obtain a preliminary breath sample for the crash investigation. Sergeant Broniec instructed me to travel to the Columbia Police Department headquarters to contact Officer Heese. At approximately 1654 hours, I left the crash scene. Sergeant Broniec and Sergeant Meyers remained at the scene.

9. At approximately 1712 hours, I arrived at the Columbia Police Department, located at 600 East Walnut Street, Columbia, Missouri 65201, I informed the clerk at the front desk I was there to speak with Officer Heese. The clerk informed me she would notify the appropriate parties. While I waited, Sergeant Broniec called me and said Lieutenant W. Ahrens was traveling to the University of Missouri Hospital to check the status of Gabrielle Curry. Several minutes later, a Columbia Police Officer escorted me to a witness room. Inside the room was a white male, later identified as Donald Weaver. Mr. Weaver informed me he was the attorney representing Officer Heese. I informed Mr. Weaver I requested Officer Heese provide a preliminary breath sample. I informed Mr. Weaver I wished to obtain routine crash information from Officer Heese. Mr. Weaver indicated Officer Heese would provide a preliminary breath sample. Mr. Weaver asked if I would also allow Officer Heese to provide a breath sample using an Intox-DMT breath instrument located at the Columbia Police Department, and I informed him I would. I informed Mr. Weaver of the questions I would ask Officer Heese as part of the crash investigation. Mr. Weaver said Officer Heese would not provide a statement or answer any questions about the crash, per his counsel. Mr. Weaver indicated he would only allow Officer Heese to provide basic demographic information such as name, date of birth, and phone number. After speaking with me, Mr. Weaver left the room. After several minutes, Mr. Weaver returned and was accompanied by Officer Heese. Officer Heese was holding a piece of notebook paper and she handed it to me. Written on the notebook paper was Officer Heese's name, date of birth, Missouri Driver License number, the Columbia Police Department address, and a phone number. I asked Officer Heese if she was willing to submit to a preliminary breath test, and she said, "Yes." At approximately 1800 hours, Officer Heese provided an adequate preliminary breath sample, which indicated a .000 percent breath alcohol concentration by weight.

10. A Columbia Police Officer escorted Officer Heese, Mr. Weaver, and myself to a room containing an Intox-DMT breath instrument. Mr. Weaver and the escorting officer waited outside the room. At approximately 1802 hours, using the time on the Intox-DMT, I began my 15-minute observation period. At 1820 hours, the Intox-DMT indicated Officer Heese's breath alcohol content was .000 percent.

11. I was escorted to the front desk of the Columbia Police Department. A Columbia Police Officer informed me Reverend James Gray was in the lobby and requested to speak with me. I waited in the witness room. A Columbia Police Officer opened the door and Reverend James walked in. I greeted Reverend James and asked him to

explain what he wished to speak to me about. Reverend James said he was contacted by a witness, later identified as T. ██████, who wanted to speak to the trooper investigating the crash. Reverend James indicated Ms. ██████ did not wish to speak to the Columbia Police Department. Reverend James retrieved his cell phone and called Ms. ██████ putting the phone on speaker mode. Reverend James informed Ms. ██████ I was with him and wanted to ask her questions about the crash. Reverend James handed his cell phone to me. I introduced myself to Ms. ██████ and asked her if she witnessed the incident, and she indicated she did. I asked Ms. ██████ to explain to me what she saw. Ms. ██████ indicated she arrived at Battle High School at approximately 1600 hours to pick up her daughter. Ms. ██████ said she parked in a handicapped parking space near the student entrance. Ms. ██████ said, "I was kind of just looking around. I noticed that a little girl and two other little kids, three total, were running up and down the sidewalk." I asked Ms. ██████ if she observed the children enter the primary traveled portion of the roadway, and she indicated she did not. Ms. ██████ said, "I was kind of watching them. There wasn't anything else to look at while I was waiting. At this point, I saw the little girl, she had appeared from the very back bus, like right where it happened at. She had a pink coat on. At the same time I saw a police vehicle pulling up. She wasn't speeding, she wasn't going fast, I don't know how she didn't see the little girl. She drives up on the curb where they park all the time. I was thinking, oh my God, please see this little girl playing. She turned. I thought she was going to put on her brakes or see the little girl. The little girl just disappeared. The vehicle shook a little. I thought it was because she was going up on a curb. I saw the police back tire go up again. The little girl was just laying there. She was ran over on the front and back tire on the driver side." Ms. ██████ indicated she exited her parked vehicle and ran to where the crash took place. Ms. ██████ said, "She gets out of the police car and instantly does compressions on the little girl... She got on the radio and called for help." Ms. ██████ indicated she observed blood on Gabrielle Curry's face. Ms. ██████ said, "Someone said they were going to get her mom. I guess her mom was a bus driver. The daughter was playing by herself, her and two other kids, she was on the sidewalk and not the road. It took the mom a while to get there. She dropped to her knees and cradled her daughter." Ms. ██████ said several passersby pulled Cheyenne Curry away from Gabrielle Curry so she could receive medical treatment from Officer Heese. After I spoke with Ms. ██████, I gave the phone back to Reverend Gray. I departed the Columbia Police Department.

12. On January 8, 2019, at approximately 1244 hours, I made phone contact with Mr. Curry. I asked Mr. Curry if he would be able to meet with me, and he indicated he could. At approximately 1600 hours, I arrived at Mr. Curry's residence, located at 3705 Weymeyer Drive, Columbia, Missouri 65202. Mr. Curry greeted me and escorted me into the living room, where Mrs. Curry was waiting. I provided Mr. Curry and Mrs. Curry a copy of the crash information sheet and informed them I was the trooper investigating the incident. I informed Mr. Curry and Mrs. Curry I was not able to answer many questions about the incident due to an on-going investigation. Mr. Curry provided me the business card of his legal counsel, attorney Matthew Woods. I provided my business card to both Mr. Curry and Mrs. Curry. I departed their residence.

13. On January 9, 2019, at approximately 0939 hours, I called John White, director of security for the Columbia Public School District. Mr. White indicated he had a USB drive containing surveillance video from Battle High School. I arrived at Fredrick Douglas High School, located at 310 North Providence Road, Columbia, Missouri 65203. I walked to the front office and was greeted by Mr. White. Mr. White escorted me to his upstairs office and inserted the USB drive into his laptop. Mr. White instructed me how to operate the program to observe the surveillance video. The program simultaneously displayed footage from four surveillance cameras near where the crash occurred. At approximately 1554 hours, I observed the Chevrolet traveling east in the roundabout. I observed Gabrielle Curry walking east on the sidewalk towards Battle High School. The Chevrolet exited the primary traveled portion of the roadway and drove onto the sidewalk. The front left side of the Chevrolet struck Gabrielle Curry. I observed the Chevrolet travel over Gabrielle Curry. The Chevrolet came to a stop. I observed Gabrielle Curry laying on the ground and she was not moving. Officer Heese exited the driver seat of the Chevrolet and appeared to use her portable radio. Officer Heese approached Gabrielle Curry and began chest compressions. After I viewed the video, Mr. White gave me the USB drive. I departed Fredrick Douglas High School and secured the USB drive in my patrol car.

14. Sergeant Broniec, along with Sergeant Meyers and Sergeant G. Ward with the Major Crash Investigation Unit, assisted with the crash investigation. I provided the USB drive containing surveillance camera footage to Sergeant Meyers.

15. The investigation is on-going.