

MISSOURI STATE HIGHWAY PATROL
PROBABLE CAUSE STATEMENT

STATE OF MISSOURI }

MISSOURI STATE HIGHWAY PATROL

COUNTY OF BOONE }

CASE # 190006730

DATE: 03/04/2020

OCN:

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

1. I have probable cause to believe that Andria Heese, on January 4, 2019, at Battle High School in Columbia, Missouri, committed the offense(s) listed below:
(To be determined by Prosecuting Attorney)

2. State the facts that support a finding of probable cause to believe crime(s) was/were committed and that the accused committed the crime(s): On January 4, 2019, Andria B. Heese was operating a motor vehicle which struck and killed a pedestrian, Gabriel C. [REDACTED]

After completing my investigation I determined the following facts regarding this incident;

Heese was traveling approximately 14 miles per hour and attempted to drive onto a multiple purpose area adjacent to the school. The multi-purpose area was designed for vehicular and pedestrian traffic.

Based off the angle of approach, blind spot testing and video analysis, it is likely Heese never saw the pedestrian.

Heese had the opportunity to see the pedestrian for approximately twenty-two feet. She was traveling approximately 20.5 feet per second (14 miles per hour). Using an average perception response time of 1.2 seconds, Heese would have covered 24.6 feet during the perception/decision making phase of the incident. This indicates the average driver would not have been able to avoid the collision.

It is incumbent upon every driver of a motor vehicle to operate their vehicles with the highest degree of care. Heese had routinely been to Battle High School in the performance of her duties. She had parked her patrol vehicle within the multi-purpose area on numerous occasions. She should have known of the potential for pedestrian traffic. She should have slowed her speed as she executed the "blind" left turn into the driveway of the multi-purpose area, so she had sufficient time to react to the sudden appearance of pedestrians.

3. For the issuance of a warrant in a misdemeanor case, complete the following, if appropriate.

A. I believe the defendant will not appear in court to respond to a criminal summons because N/A

Insert facts to show the defendant will not appear, e.g. there is an outstanding warrant for failure to appear

B. I believe the defendant poses: *Insert one or all of the following*

Insert facts showing defendant is a danger to victim, e.g. cursing victim, assaulted victim, threatened victim.

(1) a danger to a crime victim because N/A

Insert facts showing defendant poses a danger, e.g. intoxicated to a level which is unsafe

(2) a danger to the community or to any other person because N/A

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

Paul W. Meyers
Signature

3-4-2020
Date

11-18-2019 09:00:00 AM