

IN THE CIRCUIT COURT OF BOONE COUNTY, MISSOURI

STATE OF MISSOURI,)	
)	
)	Plaintiff,
Vs.)	Case Number: 19BA-CR05786-01
)	
ANDRIA HEESE,)	
)	
)	Defendant.

JOINT SENTENCING MEMO

I. Offender Information:

Date of Birth: [REDACTED]
 Gender: Female
 Race: White

A. Officer's Version of Facts:

See attached PC statement labeled exhibit A.

B. Offender's Version of Facts:

See attached statement labeled exhibit B.

II. Offender Assessment

The State has checked the Defendant through NCIC and Department of Revenue files and she has no criminal history or traffic citations.

The Defendant's highest level of education is a bachelor's degree.

The Defendant is currently employed by the Columbia Police Department.

The Defendant's recidivism level is low.

The Defendant shows no past history of substance abuse and this was not a factor in the crime.

The Defendant is married and has one child.

The Defendant has pled guilty and taken responsibility for her actions and expressed remorse.

III. Summary

The parties stipulate that the Defendant is a very low risk to reoffend or engage in any criminal behavior.

Respectfully Submitted,

Kevin Hillman #58059
Special Prosecuting Attorney
Boone County, Missouri



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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 E. Heese was operating a motor vehicle which struck and killed a pedestrian, Gabrielle Curry.

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

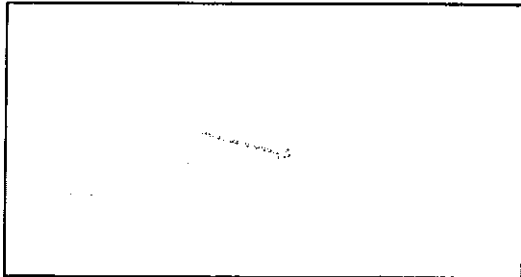


EXHIBIT B - OFFENDER'S VERSION OF EVENTS

On the afternoon of January 4, 2019, Andria Heese was working as a Columbia police officer assigned to the department's Community Outreach Unit. At the time, Ms. Heese had served as a police officer for 5 years, having started in 2013 when she was 22 years old. That afternoon, Ms. Heese's supervisor assigned her to be present at the bus loading area of Battle High School during school dismissal. She was there to build relationships, help ensure campus and community safety, and to deter, prevent, and respond to acts of violence.

Some neighborhoods served by Battle High School were experiencing a rash of violence related to an ongoing feud between two street gangs. This feud involved off-campus incidents of violence (including a murder a month earlier) and several on-campus violent fights.

Ms. Heese was assigned to drive a full-sized Chevrolet Tahoe as her patrol vehicle. As she made her way onto the school grounds 11 minutes before dismissal, she did not notice anything remarkable or out of the ordinary. She followed an arriving bus down the driveway and past a long line of busses. Ms. Heese was driving slowly and well under the posted limit.



Ms. Heese intended to park where she had always parked (and where officers had parked since the school opened in 2013) - the area designated by school administration and by her supervisors for parking police vehicles. This area is a large (67' at its widest), triangle shaped concrete area designed for vehicle and pedestrian traffic. This area is accessed by driving up an angled driveway entrance ramp designed for that purpose.

As she approached the driveway entrance ramp, Ms. Heese had no idea that Gabrielle Curry was running along the sidewalk next to the row of stopped busses. Ms. Heese had never noticed any small children in the area and had only seen high school-aged students there before. Even though Ms. Heese was paying complete attention and was not distracted by anything, Ms. Heese did not see Gabrielle.

As she passed the last bus in the line, Ms. Heese could see all around. Her view was not blocked by the parked busses. She was not executing a blind turn or driving into an area she could not see. She thought that she had full visibility and she saw that her path, and the entire area, was clear. She drove straight up the entrance ramp and onto the parking area. She did not see Gabrielle run out from behind the last bus.

As she was slowing to a stop, Ms. Heese felt a bump. When she got out and started looking around, she saw Gabrielle lying behind the patrol vehicle, seriously injured. Ms. Heese called for help, started first aid/CPR, and tried everything she could think of to help Gabrielle.

Ms. Heese now knows that, due to the combination of the fast pace that Gabrielle was running (5.9 mph), Gabrielle's height (42"), and Ms. Heese's short stature (5'1"), Gabrielle was completely blocked from Ms. Heese's view by a blind spot created by the side mirror and door post (A-pillar) of the vehicle.



Ms. Heese now knows that, had she come to a complete stop before driving up the ramp, Gabrielle might still be alive today. Ms. Heese is deeply sorry. Ms. Heese will forever regret that day and she will forever grieve for Gabrielle and for the Curry family.