

IN THE CIRCUIT COURT OF JOHNSON COUNTY MISSOURI

ASSOCIATE DIVISION III

STATE OF MISSOURI)	
)	
Plaintiff,)	
VS)	CASE NO.
)	OCN Official Court Document
PETER E GOSS)	
)	
Defendant.)	PA File No. 101137684

FELONY COMPLAINT

COUNT I Dwi - Death Of Another Not A Passenger

Comes now Robert W. Russell, the Prosecuting Attorney of the County of Johnson, State of Missouri, upon information and belief, and charges that the defendant, Peter E Goss, in violation of Section 577.010 committed the Class B felony of Driving While Intoxicated and Causing the Death of Another Person Not a Passenger of defendant's car, punishable under Section 558.002, in that on or about September 20, 2024, in the County of Johnson, State of Missouri, the defendant operated a motor vehicle under the influence of alcohol and caused the death of Kevin Ray Wilson, a person who was not a passenger in defendant's vehicle.

COUNT II Drove Wrong Direction On Highway Divided Into Two Or More Roadways - Resulting In An Accident

Comes now Robert W. Russell, the Prosecuting Attorney of the County of Johnson, State of Missouri, upon information and belief, and charges that the defendant, Peter E Goss, in violation of Section 304.015 RSMo, committed the class A misdemeanor of driving in the wrong direction, punishable upon conviction under Sections 304.015, 558.011 and 560.016, RSMo, in that on or about September 20, 2024 in the County of Johnson, State of Missouri, the defendant, while operating a motor vehicle US 50 westbound in the eastbound lanes just east of Missouri

Route W, a highway divided into two or more roadways by means of a physical barrier or by means of a dividing section or delineated by curbs, lines or other markings on the roadway, drove in the wrong direction and to the left of such barrier, dividing section, curb, line or other marking resulting in an accident.

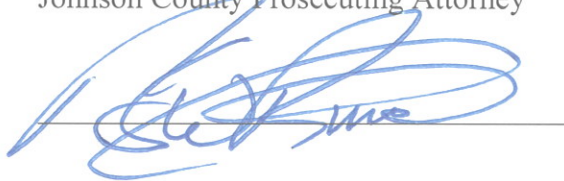
COUNT III Involuntary Manslaughter 1st Degree

Comes now Robert W. Russell, the Prosecuting Attorney of the County of Johnson, State of Missouri, upon information and belief, and charges that the defendant, Peter E Goss, 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 September 20, 2024, in the County of Johnson, State of Missouri, the defendant recklessly caused the death of Kevin Ray Wilson by driving the wrong way on a divided highway and coming into collision with the vehicle driven by Kevin Ray Wilson.

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

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

ROBERT W. RUSSELL
Johnson County Prosecuting Attorney



Robert W Russell, #38116
Prosecuting Attorney
Johnson County, Missouri

Range Of Punishment:

Class A felony - a term of years not less than ten years and not to exceed thirty years, or life imprisonment;

Class B felony - a term of years not less than five years and not to exceed fifteen years;

Class C felony – a term of years not less than three years and not to exceed ten years and/or a fine not to exceed ten thousand dollars;

Class D felony – a term of years not to exceed seven years and/or a fine not to exceed ten thousand dollars;

Class E felony – a term of years not to exceed four years and/or a fine not to exceed ten thousand dollars;

Class A misdemeanor – a term not to exceed one year and/or a fine not to exceed two thousand dollars;

Class B misdemeanor – a term not to exceed six months and/or a fine not to exceed one thousand dollars;

Class C misdemeanor – a term not to exceed fifteen days and/or a fine not to exceed seven hundred fifty dollars;

Class D misdemeanor – a fine not to exceed five hundred dollars;

Infraction – a fine not to exceed four hundred dollars.

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IN THE CIRCUIT COURT OF JOHNSON COUNTY, MISSOURI
AT WARRENSBURG
ASSOCIATE CIRCUIT DIVISION

STATE OF MISSOURI,)
)
Plaintiff,)
)
vs.) Case No:
) Agency Case No: 240483925
)
PETER E. GOSS)
)
Defendant.)

PROBABLE CAUSE STATEMENT

STATE OF MISSOURI)
)
) SS.
COUNTY OF JOHNSON)

I, Tpr. B. S. Lautenschlager, upon my oath, under penalty of perjury, state as follows:

A. I have probable cause to believe that Peter E. Goss committed one or more criminal offenses.

B. The facts supporting this belief are as follows:

On September 20, 2024, at approximately 2252 hours, Johnson County Central Dispatch advised of a reported wrong way driver traveling westbound in the eastbound lanes of U.S. 50 Highway at Missouri 131 Highway. At approximately 2255 hours, Johnson County Central Dispatch advised of a crash involving two vehicles in the northwest 1600 block of eastbound U.S. 50 Highway. Field Training Officer Trooper D. Harms and Trooper S. Edwards also responded to this incident. Upon my arrival at approximately 2307 hours, I observed multiple vehicles blocking both lanes of eastbound U.S. 50 Highway. Upon exiting my patrol vehicle, I observed a gray Chevrolet Suburban on its passenger's side facing south in the left lane of eastbound U.S. 50 Highway. I also observed a black Subaru Legacy, facing southwest in the right lane of eastbound U.S. 50 Highway. Johnson County Ambulance District personnel were attempting to make contact with the entrapped driver and sole occupant, later identified as Peter E. Goss, of the Chevrolet. Upon viewing the Subaru, it was apparent the driver was deceased.

While I attempted to process the crash scene, Goss was removed from the Chevrolet and was placed in the back of an ambulance belonging to Johnson County Ambulance District. During this time, Trooper Edwards contacted Goss. Goss consented to a preliminary breath test, which indicated his blood alcohol content was 0.160%. It should be noted the 0.160% was from a captured partial sample of his breath. After Goss provided the sample to Trooper Edwards, I made contact with Goss in the back of the ambulance. Upon entering the ambulance, I noticed a strong odor of intoxicants emitting from Goss' person. Upon contact with Goss, I observed he had bloodshot eyes.

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Based on the totality of the circumstances, it was apparent Goss' ability to safely operate a motor vehicle was impaired. At 2350 hours, I placed Goss under arrest for operating a motor vehicle in an intoxicated condition by placing my right hand on his shoulder and telling him he was under arrest for operating a motor vehicle while in an intoxicated condition. After informing Goss of this, he looked at me and said "Alright." It should be noted that as Goss spoke to me, I could smell the odor of intoxicants emitting from his breath. At this time, I released him to the care of Johnson County Ambulance District personnel for further medical treatment. After I released Goss to the care of medical professionals, I continued to process the crash scene. Goss was transported to Research Medical Center by Johnson County Ambulance district personnel. During this time, Missouri State Highway Patrol Trooper J. Conrad arrived on scene to reconstruct the crash scene.

Further investigation suggested the crash occurred as the Chevrolet was traveling west in the left lane of eastbound U.S. 50 Highway and the Subaru was traveling east in the right lane of eastbound U.S. 50 Highway, east of Missouri Route Z. As the Chevrolet approached the Subaru, the driver of the Subaru, Confidential Victim #1, applied the brakes and steered left in an attempt to avoid the Chevrolet. The Subaru partially crossed into the left lane and the front left bumper of the Chevrolet collided with the front left bumper of the Subaru. The Chevrolet traveled off the right side of the roadway and struck the guardrail on the north side of eastbound U.S. 50 Highway with its front right side. The Chevrolet then overturned and came to final on its passenger's side, facing south in the left lane of eastbound U.S. 50 Highway. The Subaru traveled off the right side of the roadway and came to final rest facing southwest, partially in the right lane of eastbound U.S. 50 Highway. It should be noted there was no evidence that the Chevrolet attempted to slow or avoid the Subaru. Confidential Victim #1 was pronounced deceased by the Johnson County Coroner on September 21, 2024 at 0014 hours.

Corporal A. D. Lindgren, who is assigned to Jackson County, responded to Research Medical Center in Kansas City, Missouri in order to finish the processing of Goss's arrest. Corporal Lindgren advised me of the following information. At 0057 hours, he made contact with Goss and informed him of Missouri's Implied Consent Law. At 0057 hours, Goss refused to submit to a chemical test of his blood and requested an attorney.

Trooper Edwards applied for and was granted a search warrant for two vials of Goss's blood with the Jackson County Courts. At 0309 hours, Trooper Harms and I served the warrant to Research Medical Center. At 0358 hours, I observed a medical doctor, Confidential Witness #1, clean Goss's left arm with an iodine swab I provided and observed her take two tubes of blood from that location through the cameras of the operating rooms where Goss was being treated. I took possession of the blood, inverted the tubes at least 20 times, and seized the blood as evidence. The blood samples were later secured in Troop A evidence and have been submitted to the Missouri State Highway Patrol Crime Laboratory for blood alcohol analysis.

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Tpr. B. S. Lautenschlager, Affiant