
United States District Court

WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

v.

PAUL M. LEACH
[DOB: 07/04/1980]

18 U.S.C. §§ 922(g)(1) and 924(a)(2)
NMT 10 Years Imprisonment
NMT \$250,000.00 Fine
NMT 3 Years Supervised Release
Class C Felony
\$100 Mandatory Special Assessment

CRIMINAL COMPLAINT

Case Number: 16-mj-00117-SWH-01

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about June 12, 2016, in Jackson County, in the Western District of Missouri, and elsewhere, the defendant PAUL M. LEACH, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, to wit: a Sig Sauer, Model P220, .45 caliber semi-automatic handgun, Serial Number 37A024910, all in violation of Title 18, United States Code, Section 922(g)(1) and 924(a)(2).

I further state that I am a Detective with Independence, Missouri Police Department and that this complaint is based on the following facts:

(See attached Affidavit)

Continued on the attached sheet and made a part hereof: Yes No.



Loran Freeman, Detective
Independence, Missouri Police Department

Sworn to before me and subscribed in my presence,

June 13, 2016

Date

at

Kansas City, Missouri
City and State

HONORABLE JOHN T. MAUGHMER
United States Magistrate Judge

Name and Title of Judicial Officer



Signature of Judicial Officer

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

A F F I D A V I T

I, Loran F. Freeman, Detective for the Independence, Missouri Police Department, the undersigned affiant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

1. I have been a commissioned law enforcement officer in the State of Missouri since July, 1993, and have been a police officer with the City of Independence, Missouri Police Department since May 10, 2001. I have received basic and advanced training regarding the investigation of narcotics/illegal drug distribution, and investigation of violent crimes, including but not limited to weapons related offenses. I have worked for the Drug Enforcement Unit of the Independence, Missouri Police Department, assigned to the Drug Enforcement Administration Task Force, Kansas City District Office Group 43, from September of 2006 through January 2009, and was subsequently assigned to the Independence, Missouri Police Department Career Criminal Unit, in conjunction with the Kansas City Career Criminal Unit Task Force. While assigned as a detective, I have participated in numerous illegal drug/narcotics, violent crime, and weapons related investigations. I have been the affiant in excess of 100 court orders issued by the Circuit Court of Jackson County, Missouri, and in excess of 20 court orders issued in the Western District of Missouri Federal Court.

2. This affidavit contains information necessary to support probable cause for this application. It is not intended to include every fact or matter observed by me or known by law enforcement. The information provided is based on my personal knowledge and observation during the course of this investigation, information conveyed to me by other law enforcement

officials and others as set out herein, and my review of reports prepared by other law enforcement officials during the course of the investigation.

3. Based upon information provided to me by other officers of the Independence, Missouri Police Department and the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), I believe the following to be true and correct:

4. On June 12, 2016, at approximately 1:39 p.m., Officers with the Independence, Missouri Police Department were dispatched to a report of a suspicious person armed with a gun, and was allegedly under the influence of illegal drugs, at or near the intersection of E. 51st Street South and Cottage Street, Independence, Jackson County, Missouri. This intersection is located within the Western District of Missouri. Officers Jake Williams, Kevin Schnell, Jeff Edwards, Chris Jenne, and Sergeant Vincent Bass were among the responding officers who were dispatched to the call for service. Upon his arrival at the scene, Officer Williams made contact with a white male subject, later identified as **Paul M. Leach**, who was believed by Officer Williams to likely be the subject described by the calling person, who wished to remain anonymous. **Leach** was encountered in the driveway of a residence identified by the address of 5109 S. Cottage, Independence, Jackson County, Missouri. Officer Williams observed **Leach** seated in a chair, near the garage door of the residence, and made contact with him there. As Officer Williams was initiating a Terry Frisk of **Leach**, **Leach** fled on foot to the lawn of the residence identified by the address of 5113 S. Cottage, and then entered the roadway, continuing to flee on foot toward the above identified assisting officers.

5. As **Leach** was being pursued, Officer Williams observed **Leach** reach into his waistband area of his pants, take hold of, and remove what was later identified as a Sig Sauer, Model P220, black in color, .45 caliber semi-automatic handgun, Serial Number 37A024910. This weapon was later examined by Officer Edwards to be in a loaded condition, with one

.45 caliber cartridge in the chamber of the weapon, and six (6) .45 caliber cartridges in the magazine which was inserted into the magazine well. Officer Williams continued to pursue **Leach** as he closed on assisting officers at the scene, and while giving loud, repetitive verbal commands to **Leach** to stop, **Leach** discarded the firearm into a shrub or bush, located immediately south of the front door of the residence located at 5113 S. Cottage, Independence, Jackson County, Missouri. **Leach** was pursued a short distance from where he was observed abandoning the above firearm, and was taken into custody without further incident. Following his arrest, **Leach** falsely identified himself as Joshua Henry, and provided a birth date of July 16, 1981. In the course of the handling officers' investigation, **Leach** ultimately provided his correct identifying information. Multiple municipal arrest warrants issued for **Leach** by the courts of multiple jurisdictions in the Kansas City, Missouri, and Kansas City, Kansas, areas were identified. At least one of the arrest warrants were for an offense relative to Assault on a Law Enforcement Officer, issued by the Kansas City, Municipal Court. **Leach** then made statements which appeared to suggest he intended to initiate an armed confrontation with the officers as he was being pursued, and stated he wished he "could have taken a couple of the officers out with him," as if suggesting he wished to severely injure or kill the officers in the encounter.

6. Officers Edwards and Jenne also observed **Leach** in possession of the above identified firearm during the pursuit, and observed him abandon the firearm at the above identified location shortly before he was apprehended.

7. Officer Edwards returned to the shrub where the firearm was discarded by **Leach**, and discovered it suspended within the shrub, above the surface of the ground. Officer Edwards collected the firearm, with gloved hands, to protect any latent evidence which may be present on or within the firearm or its magazine. This firearm was later processed by Officer Edwards as evidence.

8. Your Affiant determined this firearm was previously reported stolen to the Lee's Summit, Missouri Police Department on or about December 10, 2015, reference Lee's Summit, Missouri Police Department Investigative File #15-10539, as a result of a Residential Burglary. Further investigation yielded information that this firearm was owned by the Belton, Missouri Police Department, and was the issued duty weapon for a commissioned police officer, employed by that agency. Your Affiant contacted Corporal Peek of the Belton, Missouri Police Department, who confirmed the above information.

9. Your Affiant later contacted **Leach** at the Independence, Missouri Police Department Detention Unit to offer him an opportunity to participate in an interview. **Leach** was insulting in his demeanor and uncooperative.

10. A criminal history check of **Leach** by Your Affiant appeared to identify at least three felony convictions in **Leach's** past, which were identified as Robbery 2nd Degree, for which **Leach** was sentenced to a term of confinement for ten (10) years by judicial officials with the Clay County, Missouri Circuit Court. The three additional felony convictions appear to be for the offenses of Aggravated Battery and Kidnapping, with a term of confinement ordered but not specified in the criminal records database which was queried, issued by judicial officials with the Johnson County, Kansas Circuit Court. **Leach** appears to presently be under the supervision

of the Kansas Department of Corrections, Office of Probation and Parole for the all or part of the above identified offenses.

11. On June 12, 2016, Your Affiant contacted Special Agent Matt Wilson of the Bureau of Alcohol, Tobacco, Firearms and Explosives to obtain verbal NEXIS information regarding the origin of the above identified firearm. SA Wilson advised Your Affiant that Sig Sauer firearms are manufactured within the country of Germany, and are distributed within the United States from Exeter, New Hampshire, and that the above identified firearm had traveled in and thus affected interstate commerce.

12. Based upon my training and experience in unlawful possession of firearms investigations, Your affiant believes that **Leach** was carrying the above described Sig Sauer, Model P220 handgun, and did so knowing that he was prohibited to possess any firearm as a result of being a convicted felon.

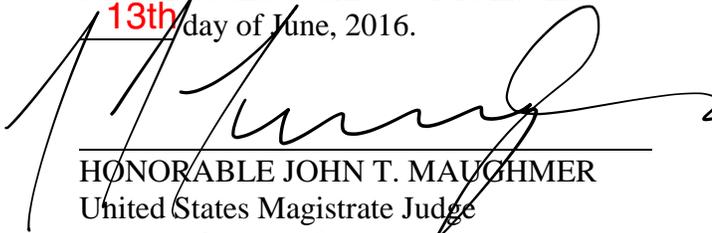
13. Based upon the above information, your affiant believes there is probable cause to believe that **Paul M. Leach** violated Title 18, United States Code, § 922(g)(1), felon in possession of a firearm; § 922(g)(3), and Title 18, United States Code, § 922(j), possession of a stolen firearm.

FURTER AFFIANT SAYETH NAUGHT.



Loran Freeman, Detective
Independence, Missouri Police Department
Career Criminal Unit Task Force

Subscribed and sworn to before me this
13th day of June, 2016.



HONORABLE JOHN T. MAUGHMER
United States Magistrate Judge
Western District of Missouri