

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

<b>POLICE NO. :</b>	19-032131
<b>PROSECUTOR NO. :</b>	095452932
<b>OCN:</b>	HR005030

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JOSHUAH K. REEDUS</b>	)	
<b>5806 E. 107th Place</b>	)	<b>CASE NO. 1916-CR</b>
<b>Kansas City, MO 64134</b>	)	<b>DIVISION</b>
<b>DOB: 04/01/1990</b>	)	
<b>Race/Sex: B/M</b>	)	
████████████████████	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Assault 1<sup>st</sup> Degree or Attempt - Serious Physical Injury or Special Victim  
(565.050-001Y19841306.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 28, 2019, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to ██████████ ██████████ by burning the genitals of ██████████.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment. TAn individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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**Count II. Assault 1<sup>st</sup> Degree or Attempt - Serious Physical Injury or Special Victim  
(565.050-001Y19841306.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 28, 2019, in the County of Jackson, State of Missouri, the defendant caused burns to the face of [REDACTED], and such conduct was a substantial step toward the commission of the offense of Assault in the First Degree of [REDACTED], an elderly person and a person with a disability, and special victim, and was done for the purpose of committing such assault.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

**Count III. Assault 1<sup>st</sup> Degree or Attempt - Serious Physical Injury or Special Victim  
(565.050-001Y19841306.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **Class A Felony of Assault in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 28, 2019, in the County of Jackson, State of Missouri, the defendant caused the vertebrae of [REDACTED] to fracture from L1 to L4 through blunt force trauma, and such conduct was a substantial step toward the commission of the offense of Assault in the First Degree of [REDACTED], an elderly person and person with a disability, and special victim, and was done for the purpose of committing such assault.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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**Count IV. Assault - 2<sup>nd</sup> Degree - Special Victim (565.052-004Y20171306.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the **Class B Felony of Assault in the Second Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 28, 2019, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED], an elderly person and a person with a disability, and special victim by burning the hip of [REDACTED] and causing a burn.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

**Count V. Elder Abuse 3<sup>rd</sup> Degree (565.184-001Y20033809.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.184, RSMo, committed the **Class A Misdemeanor of Elder Abuse in the Third Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 28, 2019, in the County of Jackson, State of Missouri, the defendant knowingly failed to act, and the result of such conduct created a substantial risk to the life, body, or health of such elderly person and person with a disability.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

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 submitted as a basis upon which this court may find the existence of probable cause.

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

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Sarah A. Castle  
Sarah A. Castle (#64770)  
Assistant Prosecuting Attorney  
415 East 12th Street, 7M Floor  
Kansas City, MO 64106  
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**WITNESSES:**

1. [REDACTED]
  2. [REDACTED]
  3. [REDACTED]
  4. PO Jermaine R. Garth, 1125 Locust, Kansas City, MO 64106
  5. [REDACTED]
  6. [REDACTED]
  7. DET Nathan C. Kinate, 1125 Locust, Kansas City, MO 64106
  8. [REDACTED]
  9. [REDACTED]
- [REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 5/29/2019

CRN: 19-032131

I, Detective Nathan Kinate #5558, Kansas City Missouri Police Department, Domestic Violence Section (Name and identify law enforcement officer, or person having information as probable cause.)

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

I have probable cause to believe that on 04/28/2019, at 9625 Belmont in (Date) (Address)

Kansas City, Jackson Missouri Joshua K. Reedus (County) (Name of Offender(s))

B/M 04/01/1990 committed one or more criminal offense(s). (Description of Identity)

Assault Elder Abuse

The facts supporting this belief are as follows:

On 05/02/2019 at 1217 hours, Officers of the Kansas City, Missouri Police Department responded to the University of Kansas Medical Center, 3901 Rainbow Blvd, Kansas City, Kansas, in regard to a reported Elder Abuse.

Officers contacted [redacted], an employee of KU Medical Center, who advised [redacted] was admitted to the Emergency Department at KU on 04/29/2019, due to sustaining possible scalding burns to his genital region and part of his face. [redacted] advised that [redacted] lives at 9625 Belmont St, Kansas City, Jackson County, Missouri and was under the care of New Bates Residential Care. [redacted] is a black male born 09/04/1948; [redacted] is an elderly person who has been diagnosed with severe intellectual disability, psychosis, anxiety disorder, a seizure disorder, and mood disorder.

Detectives contacted [redacted], [redacted]'s legal guardian, [redacted] advised that [redacted] has been a resident of New Bates Residential Care for over twenty years. [redacted] stated [redacted] is the owner and director of New Bates Residential Care. Detectives contacted [redacted] who advised [redacted] was responsible for [redacted] patient care on 04/28/2019 from 0700-1900 hours and the suspect, Joshua REEDUS, B/M, 04-01-1990, was responsible for [redacted] patient care from 1900-0700 hours [redacted] advised that [redacted] was the individual who relieved REEDUS the morning of 04/29/2019.

[redacted] stated he has been an employee of New Bates Residential Care for 11 years. When asked about [redacted]'s day to day care, he stated [redacted] is not allowed to bath unattended and has to be assisted by staff. He stated [redacted] is able to get up and ambulate independently to the restroom and does not wear a diaper. In the 11 years he has worked at the home [redacted] has never showered unsupervised. When REEDUS arrived the two had a brief shift recap and he observed [redacted] sitting in the living room in a recliner as he left. [redacted] had disclosed to him about a week before 04/28/2019 that [redacted] had fought with REEDUS and that REEDUS had hit [redacted] giving him a black eye. He went to [redacted] and asked her to get rid of REEDUS because REEDUS had assaulted [redacted]. When he ([redacted]) left the home on 04/28/2019

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██████ did not have any visible injuries or any injuries that he was complaining about. ██████ had been with ██████ for 12 hours giving ██████ ample time to disclose any injuries.

██████ stated the following: She has worked for **New Bates Residential Care** for 5 years and has worked at 9625 Belmont for 2 years. She arrived for work on the morning of 04/29/2019 at around 0645 hours. **REEDUS** met her at the door and said ██████ "has some weird blisters on his groin area". **REEDUS** appeared very nonchalant about ██████'s injuries. She examined ██████'s injuries and was immediately concerned for his wellbeing. She told **REEDUS** he should have called 911 these injuries are bad and ██████ needed medical attention. **REEDUS** said he called ██████ (Manager of **New Bates Residential care**) and tried to let her know. ██████ immediately notified her supervisor, ██████ (Assistant Director of **New Bates Residential care**), and called 911. She did not feel comfortable keeping and caring for ██████'s injuries due to their severity.

██████ stated the following: On 04/28/2019 at approximately 2300 hours, she was contacted by **REEDUS**. **REEDUS** informed her that ██████ had some blisters or a bad rash across his private area. She asked **REEDUS** to send her photos of the area, but **REEDUS** refused to as his phone wasn't acting "right". The next morning that she received a call from ██████ who informed her about the blisters looking more like burns and sent her photos of ██████'s injuries. ██████ informed her that ██████ was transported to the Hospital. Since 04/29/2019 every time she has attempted to contact **REEDUS** he refuses to talk to her or make any statements about what happened.

██████ suffered known displaced right transverse process fractures to L1, L2, L3, L4; multiple superficial lacerations and burns to the left side of his face including the nasal bridge and infraorbital margin; ecchymosis of the left eye; a large ecchymosis of the right flank; multiple superficial burn wounds of the bilateral posterior thighs; circumferential burns of the foreskin extending to the scrotal skin; orthotropic meatus; and blistering of the inner thighs bilaterally.

On 05/24/2019 Detectives issued a stop order for **REEDUS**. On 05/28/2019, **REEDUS** was taken into custody and transported to a police facility for questioning. Detectives read **REEDUS** his Miranda rights and he stated he wanted a lawyer.

Printed Name Detective Nathan Kinate #5558 Signature /s/ Det. Nathan Kinate #5558

The Court finds probable cause and directs the issuance of a warrant this \_\_\_\_\_ day of \_\_\_\_\_.

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.