

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

|                         |            |
|-------------------------|------------|
| <b>POLICE NO. :</b>     | KC19073279 |
| <b>PROSECUTOR NO. :</b> | 095455153  |
| <b>OCN:</b>             | HS013551   |

|                                     |   |                         |
|-------------------------------------|---|-------------------------|
| <b>STATE OF MISSOURI,</b>           | ) |                         |
|                                     | ) | <b>PLAINTIFF,</b>       |
| <b>vs.</b>                          | ) |                         |
|                                     | ) |                         |
| <b>STEVEN ALLEN</b>                 | ) |                         |
| <b>5440 Blue Ridge Cutoff, #519</b> | ) | <b>CASE NO. 1916-CR</b> |
| <b>Kansas City, MO 64133</b>        | ) | <b>DIVISION</b>         |
| <b>DOB: 10/11/1955</b>              | ) |                         |
| <b>Race/Sex: B/M</b>                | ) |                         |
| <b>S.S.N.: XXX-XX-5640</b>          | ) |                         |
|                                     | ) | <b>DEFENDANT.</b>       |

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Assault 1st 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 September 24, 2019, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Confidential Victim by repeatedly striking Confidential Victim.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served. 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. 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.

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.

**State vs. Steven Allen**

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/ Audrey McCormick*  
Audrey McCormick (#63071)  
Assistant Prosecuting Attorney  
415 East 12th Street, Floor 7M  
Kansas City, MO 64106  
(816) 881-3555  
AEMcCormick@jacksongov.org

**WITNESSES:**

1. DET Jarrel D. Berryman, 1125 Locust, Kansas City, MO 64106

2. [REDACTED]

3. PO Denisa Gallova, 1125 Locust, Kansas City, MO 64106

4. DET Nathan C. Kinate, 1125 Locust, Kansas City, MO 64106

5. [REDACTED]

[REDACTED]

[REDACTED]

64106

7. DET Lauren E. Montgomery, 1125 Locust, Kansas City, MO 64106

8. [REDACTED]

9. PO Naeem Powell, 1125 Locust, Kansas City, MO 64106

10. PO Jamison Raines, 1125 Locust, Kansas City, MO 64106

11. PO Vincent C. Rocha, 1125 Locust, Kansas City, MO 64106

12. [REDACTED]

64106

13. DET Alexis M. Vega, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09-25-2019

CRN: 19-73279

I, Det. Nathan Kinate #5558, Kansas City Missouri Police Department, Domestic Violence Unit
(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 09-25-2019, at 5440 Blue Ridge Cutoff, Apt #519 in
(Date) (Address)

Kansas City, Jackson Missouri Steven ALLEN
(County) (Name of Offender(s))

B/M 10-11-1955 committed one or more criminal offense(s).
(Description of Identity)

Domestic Assault

The facts supporting this belief are as follows:

On 09-24-2019, at 2328 hours, officers of the Kansas City Missouri Police Department were dispatched to 5440 Blue Ridge Cutoff, Kansas City, Jackson County, Missouri for a reported disturbance. Upon arrival, they contacted the witnesses, and, who advised an assault with serious injuries had occurred in apartment #519 and the victim was currently lying in the hallway. Officers located the victim face down on her stomach in the hallway in front of apartment #519. Officers knocked on the apartment door and Steven ALLEN B/M 10-11-1955 opened the door and was taken into custody.

stated the following: He was employed as unarmed security at 5440 Blue Ridge Cutoff. The night manager received a phone call that there was noise on the 5th floor, and responded there with the manager. They initially heard no noise, and the manager left. hen heard a disturbance in apartment #519 consisting of a female telling a male to stop and get off her, followed by the sound of 5-6 punches. After the punches stopped, could not hear the female anymore. called the manager to respond again, and could hear the male telling the female to get up and get off the floor. The manager knocked and the male inside the apartment opened the door naked and insisted everything was fine. asked to speak with the victim, and the male tried to shut the door on them but was prevented by the manager's foot in the door. observed the female victim lying on the floor of the apartment unresponsive in a contorted position. They had already called police and met officers in the parking lot to allow them entry. When he returned, the victim was unresponsive in the hallway and the same male he had seen in the apartment was handcuffed.

stated the following: He was the night manager of 5440 Blue Ridge Cutoff. He and his wife received a call in which no one said anything, and responded with the security guard to the apartment the call came from. called and told him the security guards needed help right away. responded and heard a woman screaming, a man yelling and sounds he believed were punching. The woman then stopped screaming. Steven ALLEN B/M 10-11-1955 opened the door and immediately recognized him. Inside the apartment, saw the victim lying on the floor unresponsive. When he returned after letting police in, he observed the victim lying in the hallway still unresponsive. confirmed that ALLEN was the same suspect he saw police taking into custody and the same person who had been in the apartment with the victim.

PROBABLE CAUSE STATEMENT FORM

CRN 19-73279

█ stated the following:

Last night 9/24/2019 between 2200-2300 hours she heard a loud argument coming from her neighbor's apartment in apartment 519, she stated she could hear the male neighbor yelling and cursing at the female neighbor. During the argument she could hear some commotion coming from the apartment. When the noise became louder and more disruptive she called the office and reported the neighbors to the night manager.

Officers observed █ to have a bruised and swollen eye with fresh blood surrounding it, bruises to her elbows and back, and cuts and bruises to both knees. █ was unresponsive and was transported to Research Medical Center by EMS, where she was intubated and diagnosed with several brain bleeds. █ is still in a coma as of 09-25-2019.

ALLEN was transported to a police holding facility, where detectives of the Kansas City Missouri Police Department responded to interview him. ALLEN was read his Miranda rights, and stated the following: he has known █ (referred to by her first name) for approximately one year. █ comes to his apartment frequently to visit but she does not live there. A couple of months prior, █ was diagnosed with a disease that caused her to faint and fall frequently, and used a walker and cane. On 09-24-2019, they were at ALLEN's apartment drinking. They began arguing because ALLEN had noticed things missing from his apartment and because █ had been letting unknown people in his apartment in his absence. They yelled at each other for approximately one hour, but the argument never became physical. They were sitting on the couch in the living room, █ when █ passed out from being intoxicated and rolled onto the floor. Shortly after the argument was over, security came to the door and said the neighbor was complaining about the noise. The security saw █ on the floor and said she was not allowed to be there. Security left and █ woke up. █ then crawled out of the apartment and passed out in the hallway. Shortly after, security returned with the police. ALLEN stated he was very intoxicated but could remember everything that happened. ALLEN also stated when █ arrived at his apartment she did not have any injuries, and he did not know how she became injured. He then refused to speak further with detectives.

A warrant is requested for ALLEN and a bond is requested to be associated with that warrant due to the victim's severe injuries, which are life-threatening and that ALLEN represents a clear danger to the community and the victim.

Printed Name Det. 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.