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

POLICE NO.	: KC19064232
PROSECUTOR NO.	: 095456267
OCN	:
STATE OF MISSOURI,	)
PLA	INTIFF, )
vs.	)
	)
ARLANDEZ R. DREW	)
9532 Charlotte Street, 64131	) CASE NO. 1916-CR
Kansas City, MO 64131	) <b>DIVISION</b>
DOB: 10/04/1991	)
Race/Sex: B/M	)
	)
DEFE	NDANT.
COM	DI AINT

# COMPLAINT WARRANT REQUESTED

Count I. Abuse Or Neglect Of A Child - Resulting In Death Under Sec. 568.060.5(2) - No Sexual Contact (568.060-001Y20133802.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.060, RSMo, committed the class A felony of abuse or neglect of a child, punishable upon conviction under Sections 558.011, 558.002 and 558.011, RSMo, in that on or about August 23, 2019, in the County of Jackson, State of Missouri, the defendant was eighteen years of age or older, and knowingly caused J.H. (DOB: 6/7/19), a child less than eighteen years of age, to suffer physical injury as a result of abuse by causing trauma to the head and, J.H. died as a result of injuries sustained from this conduct.

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

#### State vs. Arlandez R. Drew

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/ Jill Icenhower

Jill Icenhower (#44197) Assistant Prosecuting Attorney 415 East 12th Street 7M Floor Kansas City, MO 64106 (816) 881-3379 jicenhower@jacksongov.org

#### **WITNESSES:**

1.	
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- Latondra B. Moore-Harrison, 1125 Locust, Kansas City, MO 64106
- 9. DET Angelina M. Sanchez, 1125 Locust, Kansas City, MO 64106
- 10. PO Charmainne Sanders, 1125 Locust, Kansas City, MO 64106
- 11. CST M. Thumann, 1125 Locust, Kansas City, MO 64106

Date: 12-03-2019				CRN:	KC190642	262
I, Detective Angelina Sanchez #5708 c	of the Kansa	as City M	issouri Police	Departme	nt	
(Name and identify law enforcement officer	, or person ha	iving inform	nation as probabl	e cause.)		
knowing that false statements on this for	m are punis	shable by	law, state that	the facts	contained h	erein are true.
I have probable cause to believe that on	08-23-201	19	, at 9532	Charlotte	Street	in
		ate)		(/	Address)	×
Kansas City, Jackson County	Missouri	Arlande	z R. Drew			
(County)	-			me of Offer	nder(s))	
R/S: B/M DOB: 10-04-1991	9	1	committee	d one or m	nore crimina	al offense(s).
(Description of Identity	y)					

The facts supporting this belief are as follows:

On 08-23-2019 at 1413 hours, officers with the Kansas City Missouri Police Department responded to 9534 Charlotte Street, Kansas City, Jackson County, Missouri on a reported EMS call involving a non-breathing infant. Responding officers made contact with Arlandez R. **Drew** B/M 10-04-1991 who advised he was caring for the victim, J. Holland, at 9532 Charlotte Street by himself when J. Holland began choking on formula on the bed in an upstairs bedroom. **Drew** advised he brought J. Holland downstairs because he wasn't breathing and notified the neighbor at 9534 Charlotte performed CPR on J. Holland until EMS arrived. **Drew** accompanied J. Holland to St. Joseph Medical Center by ambulance. J. Holland was subsequently transported to Children's Mercy Hospital where he was declared deceased on Sunday, 08-25-2019.

While on scene at 9532 Charlotte Street, responding officers were shown the upstairs bedroom by **Drew** where he initially attempted to feed J. Holland. Officers observed two stains on the dark sheets and **Drew** indicated that these areas were a result of J. Holland throwing up formula. The officer believed that one spot appeared to be thrown up formula and the other spot was an unknown fluid which made the dark bedding wet in appearance. The officer observed a partially full bottle in close proximity to the two spots. **Drew** relayed to officers that while the neighbor was performing CPR on J. Holland downstairs, he threw up again. On the carpeted living room floor to the west of the couch, officers observed a blanket and another white spot, which appeared to be formula. Another bottle was observed on the living room couch.

On 08-24-2019 at 1622 hours, Officers with the Kansas City Missouri Police department were dispatched to Children's Mercy Hospital located at 2401 Gillham Road, Kansas City, Jackson County, Missouri on a reported Assault. Officers were informed by the Scan Doctor that a CT Scan of J. Holland revealed bleeding in the brain and extreme swelling, as well as retinal bleeding. The physicians believed that the injuries were consistent with head trauma abuse.

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under her boyfriend, <b>Drew's</b> , care at her residence. stated that she resumed working approximately three weeks prior, 08-05-2019, and had left J. Holland under the care of three different people during that time period. reported that her father, babysat J. Holland the first week, and her friend, watched him the second week. The third week (week of 08-19-2019), <b>Drew</b> watched J. Holland on Monday, Tuesday, and Friday. Her father, had custody of J. Holland on Wednesday and Thursday. also reported to Detectives that J. Holland had been healthy up until the past four or five days when he began vomiting everything he ate and sleeping more often. advised that she had scheduled a doctor's appointment for J. Holland on 09-05-2019.
After learning of J. Holla 's death and circumstances which surrounded it, the investigation was taken over by the Homicide Unit.
On 08-27-2019 was re-interviewed and confirmed the aforementioned timeline. believed that J. Holland became ill on Sunday, 08-18-2019 and as the week progressed, threw up his formula more often and slept longer explained that she typically fed J. Holland 4 ounces every 30 minutes to an hour every day but there were days that week where J. Holland would only hold down one bottle a day. explained that the consistency of the vomit started off light but started get thicker over time, sometimes in chunks. stated that prior to this week; J. Holland would typically nap an hour or two but began sleeping for almost four or five hours confirmed she made a doctor appointment on 09-05-2019 at Swope Health with Dr. Jane Gerney but planned to take him to their urgent care on Friday the 23 <sup>rd</sup> when she got home from work. advised that on the days watched him, she had informed him that J. Holland had been throwing up. had reported to her that J. Holland had been throwing up and been a little more fussy than usual. Stated that Holland wasn't much of a "cry baby", that he was usually active, talking, laughing, playing, or chewing on his fingers. She advised that he typically cried when he wanted more attention, needed a diaper change, wanted a bottle, or sleepy.
stated that overnight Thursday 08-22-2019 into the morning of Friday 08-23-2019, J. Holland woke up around 0400 hours, which is typical for him. She woke up around 0300 hours and prior to J. Holland waking, took a shower. When J. Holland woke up, she noticed he had a dry diaper, which was unusual for him then gave him a bath, got him dressed and fed him a bottle, which he threw up some of. put J. Holland back down and he fell asleep before she left for work. stated she has to be at work by 0800 hours and tries getting there at around 0730 to 0740 hours. stated she was later notified of the incident and was picked up from work by her neighbor who drove her to the hospital.
On 08-29-2019, Arlandez <b>Drew</b> responded to headquarters to provide a voluntary statement. <b>Drew</b> stated he is boyfriend of about two or three months and had been watching J. Holland on 08-23-2019. <b>Drew</b> stated that on that morning, he had been asleep but had woken up for a while before left for work around 0600 hours. During that time, <b>Drew</b> observed her feed J. Holland and put him down on the bed on his stomach. <b>Drew</b> advised that J. Holland did not vomit after this feeding. After left, <b>Drew</b> went back to sleep in the same bed as J. Holland and he didn't wake back up until 0900 or 1000 hours; but J. Holland had slept the entire time. At around 1100 or 1200 hours, <b>Drew</b> stated he was doing chores in the upstairs bathroom when he heard Holland "stir in his sleep." When <b>Drew</b> , checked on him, he observed J. Holland had a dirty diaper which he described as a "hard little constipated little knot" so he changed him. After the diaper was changed, <b>Drew</b> put J.

Holland back down on the bed and he fell back asleep after about 30 minutes. A few hours later, **Drew** was sorting clothes and picking up trash in the same bedroom J. Holland was sleeping in. **Drew** stated J. Holland began crying "real hysterical" and so he checked on him, picked him up, but J. Holland continued to cry. **Drew** sat J. Holland back down on the bed, and began mixing a bottle for him. **Drew** stated they keep a bottle of purified water and the formula in the bedroom so he did not need to leave the room. **Drew** stated he added 5 ounces of purified water and two scoops of formula, shook it, and tested it on his hand to see if it was at room temperature and gave the bottle to J. Holland. **Drew** described that when he gave the bottle to J. Holland, he had him propped up on a pillow with another pillow next to him to prevent the bottle from rolling off. However, J. Holland kept moving around and every time he moved, the bottle came out of his mouth causing him to cry again. **Drew** stated he got a blanket and rolled it up and set it on J. Holland's lower body so he could rest the bottle on top of it to prevent it from falling out of his mouth. This solution did not work and J. Holland continued to cry when the bottle was out of his mouth. At this time, **Drew** kept J. Holland on the bed but held the bottle up for him until he finished all but "little remnants."

After being fed, **Drew** stated J. Holland began "stirring down"; "cooing" and "making little moves" with his hands and body before relaxing and falling back asleep. **Drew** went back to cleaning up around the room when he heard J. Holland vomit. **Drew** described this vomit as a "belch" mixed with a sneeze. **Drew** observed baby formula "gushing" out of J. Holland's mouth, and snot and formula coming out of his nose. **Drew** stated he picked up J. Holland and tried cleaning him off with a baby wipe, but J. Holland continued to vomit. **Drew** stated when he realized J. Holland was choking, he turned him over and began to pat his back; at this time J. Holland is coughing and "convulsing." **Drew** then put J. Holland on his back and started to check his airway as J. Holland's breath "was ragged" and **Drew** could see "his chest heaving." **Drew** then began to blow into J. Holland's mouth in an effort to clear any obstruction. **Drew** stated when he performed this action; baby formula and mucus came out of his mouth. **Drew** stated J. Holland continued to convulse and struggle to breathe so he turned him on his side. At this time, **Drew** observed J. Hollands eyes began to roll into the back of his head. **Drew** picked up J. Holland and quickly ran downstairs with him and put him on the couch while he went to the neighbor for help. **Drew** stated the neighbor came to his residence and performed CPR until the ambulance arrived. **Drew** then accompanied J. Holland in the ambulance to the hospital.

On 09-11-2019, father, responded to headquarters to provide a statement. stated he
babysat J. Holland the first week returned to work; he believes only on Wednesday, Thursday, and Friday
that week (the week of 08-12-2019). stated he also watched J. Holland at his residence in Kansas on
Wednesday 08-21-2019 and Thursday 08-22-2019, and that he kept him overnight stated he met
at a bus stop downtown the morning of the 21st to pick up J. Holland and he slept most of the morning. When J.
Holland woke up, gave him a 4 ounce bottle which he spit up "kind of a lot stated he fed J.
Holland about four times a day, roughly every four hours, and sometimes he spit up and sometimes he didn't.
When he did spit up, sometimes it was a little and other times it was "quite a bit" but not the entire 4 ounces.
thought that he may have been spitting up because it was hot that day and the milk "soured on his stomach."
stated other that the vomiting, J. Holland acted as expected and he would sit in his chair and play.
stated that J. Holland would take naps off and on throughout the day; that he'd lay him down and
he'd wake back up after 10 or 15 minutes. stated that he did not find anything out of the ordinary about J.
Holland's behavior from the first time he watched him other than the vomiting. stated that J. Holland

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slept all through the night and his diaper activity was normal. advised that did not mention anything to him about J. Holland possibly falling ill that week, nor mention anything about him vomiting or sleeping more frequently.
On 11-20-2019, detectives received the Medical Examiners report which indicated the cause of J. Holland's death was from complications of head and neck trauma and the Manner as homicide.
On 12-02-2019, Drew was taken into custody and transported to police headquarters. Drew was read his Miranda Warning and agreed to speak with detectives. Drew denied having any involvement in causing injuries resulting in the death of J. Holland.
Printed Name Detective Angelina Sanchez #5708 Signature /s/ Detective Angelina Sanchez #5708
The Court finds probable cause and directs the issuance of a warrant this day of
Judge
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Circuit Court of \_\_\_\_\_ County, State of Missouri.