

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

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ALLEN T. BLOODWORTH)	CASE NO. 1916-CR05851-01
)	DIVISION 14
)	
DEFENDANT.)	

NOTICE OF DISMISSAL

1. On September 27, 2019, Allen T. Bloodworth (“Defendant”) was charged with 31 counts of Forgery, a Class D Felony, in the above-captioned case. The charges stemmed from an investigation into suspicious towing practices of Defendant’s company, Private Party Impound, LLC, which began on February 24, 2017.

2. Defendant is currently out on bond pending a trial date.

3. On December 16, 2020, Defendant produced a partial recording of a phone call. The recording is purported to be of a 2019 phone conversation in which Kansas City Police Department sergeant Brad Lemon, president of the Fraternal Order of Police, threatened Defendant with police action if Defendant did not release a car for one of Lemon’s family members. Defendant had apparently towed the car. He explained to Mr. Lemon that he could legally release it only to the registered owner, or someone designated by the owner. Mr. Lemon’s family member was not the registered owner and he offered no proof of designation, but Mr. Lemon wanted the car released anyway. Defendant refused to give Mr. Lemon the car. Mr. Lemon stated his position with KCPD and leadership of the police union, mentioned a past investigation into Defendant and then says, “it’s game on . . . we’ll start the same routine with you then.”

4. The clear implication was that, if Defendant refused to give Mr. Lemon the car, Mr. Lemon would use his influence in the police department and union to bring law enforcement action against Defendant. Defendant refused Mr. Lemon's demands.

5. In discovery, KCPD produced a June 15, 2019, email between another KCPD officer and Mr. Lemon. Based on the context of the message and the lack of any preceding messages from Mr. Lemon, it appeared that some offline communication occurred between Mr. Lemon and at least one other member of KCPD regarding the Defendant. The communication implies that Mr. Lemon contacted the officer in an undocumented manner based on an interest in the Defendant.

6. The entirety of the recording in the possession of the Prosecutor has been transcribed below.¹

Defendant: ...Service.

Brad Lemon: Hey this is Brad Lemon out of Kansas City Police Department. I'm, uhh, president of the police union. I got a phone call from my niece that says you guys towed our family's car from Two Light and now you're requiring us to go get a...

Defendant: We're requiring you to comply with the law to get the car back, correct. The owner of the vehicle is someone's grandmother or something?

Brad Lemon: Yeah she's two hundred miles away.

Defendant: Ok. The Kansas City Missouri Tow Lot wouldn't release him the car the way the circumstance are now, so I don't know why we would. Umm, you have to be the registered owner of the car.

Brad Lemon: She's 91 dude. There's no way we can do that.

Defendant: Ok. I sent whoever called earlier a notarized power of attorney that will allow them to have her sign and notarize it, and then a third-party can pick up the car.

¹ A copy of the audio file is attached to this document as Ex. 1. That exhibit will be filed with the Court.

Brad Lemon: So, didn't we investigate you at property crimes a couple years ago for felonies for doing stuff like this?

Defendant: You mean I was exonerated because you guys have a rogue cop that likes to jack with people, and OCC...

Brad Lemon: It's game on.

Defendant: OCC or whatever, what do you mean it's game on?

Brad Lemon: We'll start the same routine with you then.

Defendant: What do you mean you'll start the same routine with me?

Brad Lemon: I guarantee I'm going to talk to (unintelligible), this is going to be the last you tow them.

Defendant: What's your name sir?

Brad Lemon: Brad Lemon, I'm the president of the police union. You can file whatever you want to file.

Defendant: Ok so, you're telling me because I'm trying to comply with the law and make sure I release the...

7. Mr. Lemon's words, invoked in the name of KCPD and the Fraternal Order of Police, combined with his documented receipt of information regarding Defendant, undermines the integrity of the investigation, exposes all officers in this case to accusations of substantial partiality, and negatively impacts the credibility of the State's evidence and the testimony of its primary witnesses. This matter has been referred to law enforcement for further review.

8. For these reasons, we dismiss all charges in *State v. Allen Bloodworth*, 1916-CR05851-

01.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was transmitted electronically through the Missouri e-Filing System on 12/22/2020 to all attorneys of record.

/s/ Daniel M. Nelson
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