


FILED  
DIVISION 26

13 Feb-2021 19:39

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE


CIRCUIT COURT OF JACKSON COUNTY, MO  
BY *Kenneth R. Gant III* DCA

<b>POLICE NO. :</b>	21-000754
<b>PROSECUTOR NO. :</b>	095462997
<b>OCN:</b>	EO007591

STATE OF MISSOURI, )  
 )  
 ) **PLAINTIFF,** )  
 vs. )  
 )  
 )  
 )  
 ) **BRYAN T SNOW** )  
 ) **4901 S Valley View Rd.** ) **CASE NO. 2116-CR**  
 ) **Blue Springs, MO 64015** ) **DIVISION**  
 ) **DOB: 06/23/1990** )  
 ) **Race/Sex: W/M** )  
 )  )  
 ) **DEFENDANT.** )

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree  
- 1st Offense - No Sexual Conduct (568.045-005Y20203899.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 9, 2021, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of  a child less than seventeen years old, by confining without sufficient nutrition.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); 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.

**State vs. Bryan T Snow**

**Count II. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20203899.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 9, 2021, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED], a child less than seventeen years old, by confining without sufficient nutrition.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); 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.

**Count III. Domestic Assault - 2nd Degree (565.073-003Y20201399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.073, RSMo, committed the **class D felony of domestic assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.002, RSMo, in that on or between February 9, 2021 and February 12, 2021, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to [REDACTED] by leaving [REDACTED] confined in a bathtub knowing [REDACTED] was unable to remove herself from it, and [REDACTED] and defendant were family or household members in that [REDACTED] and the defendant had been in a continuing social relationship of a romantic or intimate nature.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); 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.

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.

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

**State vs. Bryan T Snow**

**JEAN PETERS BAKER**

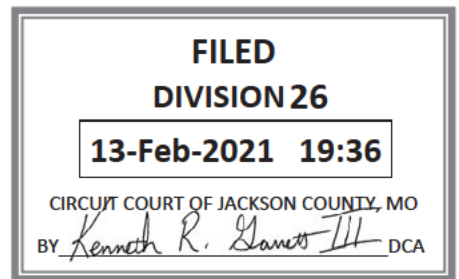
Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Kelly Collins

Kelly Collins (#68006)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3288  
kmcollins@jacksongov.org

**WITNESSES:**

1. [REDACTED] Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED], Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. [REDACTED] Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. DET Keegan Hughes, P.O. Box 392, Blue Springs, MO 64015
5. PO Coby Jacobsen, 1100 SW Smith, Blue Springs, MO 64015
6. PO Paula Pickett, 1100 SW Smith, Blue Springs, MO 64015
7. PO Kate Tipton, 1100 SW Smith, Blue Springs, MO 64015



**PROBABLE CAUSE STATEMENT**

**Date:** February 13, 2021

Police Complaint Number: 2021-000754

**I, Detective Kate Tipton, a Police Officer for the City of Blue Springs, Missouri, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.**

1. I have probable cause to believe that on **02/12/2021** at **434 SW Moreland School Road Apt 3**, Blue Springs, Jackson County, Missouri 64015, **Bryan T. Snow W/M 06/23/90** [REDACTED] committed one or more criminal offense(s).

2. **The facts supporting this belief are as follows:**

On 02/12/21 at 1637 hours, Blue Springs Police Officers Donato, Jacobsen and Pickett were dispatched 434 SW Moreland School Road, Apartment #3 to assist the Central Jackson County Fire Protection District (CJC) with a medical “lift assist” call.

Upon arrival, the officers made contact with CJC medical personnel who advised that they were called for a 27-year-old woman, identified as [REDACTED], who was stuck in the bathtub. PO Pickett contacted the woman’s boyfriend identified as **Bryan T. Snow W/M 06/23/1990**. Mr. Snow provided the officers with the information that [REDACTED] had multiple Sclerosis (MS) and was placed in the bathtub in the apartment two to three days prior.

Mr. Snow advised that he had a friend “[REDACTED]” who was checking on [REDACTED] while Mr. Snow was working in Kansas City. Mr. Snow stated that he worked in Kansas City for two days then came back to the apartment on the third day to check on [REDACTED]

When CJC found [REDACTED], they advised that she was in the bathtub, naked, sitting in approximately six inches of urine/feces. CJC Captain Cowick advised that the apartment smelled strongly of urine, feces and “dead body/decaying flesh.” Captain Cowick advised that [REDACTED] had open “pressure sores” from sitting in the bathtub for an extended period of time. Captain Cowick advised that it was the worst pressure sores that he has seen in his 27 years of emergency medical services.

[REDACTED] was transported to a local hospital where the doctor advised that if [REDACTED] had not been treated for her wounds it could have been life threatening due sitting in the urine and fecal matter. While at the hospital, the nursing staff contacted Officers Donato and Jacobsen and advised that they heard [REDACTED] on the phone with Mr. Snow and there were five-year-old twin girls at the apartment with Mr. Snow.

On 02/12/2021 at 1824 hours, PO Pickett attempted to do a welfare on the check the five-year-old girls after learning that they were in the home at the time of the initial incident. PO Pickett advised that there were no signs nor did [REDACTED] or Mr. Snow mention that children were in the home during the initial call for service. PO Pickett was contacted by [REDACTED] mother who advised that she was contacted by Mr. Snow to come over and pick up the apartment and help take care of the girls. PO Jacobsen radioed that Mr. Snow had spoken to her on the phone and that he was at the local “Dollar Tree” store and would meet officers there so that the officers could check the welfare of the girls.



When PO Pickett and other officers checked the “Dollar Tree” and did not locate Mr. Snow or the girls. PO Pickett followed up with the information on “██████████” and found that “██████████” was ██████████. Mr. Bowman said that he had not had any contact with Mr. Snow. Mr. ██████████ said Mr. Snow and his girls was not at the ██████████ residence and didn’t know how to contact Mr. Snow.

On 02/12/2021 at 2148 hours, Blue Springs Police Dispatch advised that Mr. Snow was in contact with them and that the two girls, identified as ██████████ and ██████████ were at the apartment with him and had not left the apartment today. PO Pickett and PO Stewart responded to the apartment and contacted Mr. Snow and ██████████ and ██████████. Mr. Snow advised PO Pickett that he wanted to spend more time with his “princesses” before he let the police back into the apartment.

PO Pickett advised that the two girls were extremely malnourished and were “skin and bones” and were eating out of a cereal bag. PO Pickett noted that the apartment was covered in trash, Ensure/Pedisure bottles and smelled of urine, feces and “decaying flesh/ dead body”. Mr. Snow told PO Pickett that the only reason the apartment and girls looked so bad was because Travis had not checked on them. PO Pickett contacted Children’s Division and CJC and the girls were transported to Children’s Mercy Hospital.

The girls were transported to Children’s Mercy Hospital for evaluation.

This Detective, Detective Kate Tipton, contacted the Children’s Mercy Hospital Social worker on 02/13/2021. I was advised that the girls were seen by a Children’s Mercy doctor who specializes in “forensic child abuse and emergency medicine.” ██████████ was described as a quiet girl with more hair. She advised that she was diagnosed with Child Neglect (Malnourishment), Failure to Thrive, Suspected Child Abuse and Supervisional Neglect. ██████████ had a linear scar on her leg and told the doctor that “Dad” did it. ██████████ had patterned and circular bruising and abrasions that appeared to be bite marks on her back. CD advised that the marks on ██████████’s back were from sleeping on an uncovered box spring. ██████████ weighed 33.5 lbs, which made her in the seventh percentile for her age. The social worker advised that ██████████ was the “targeted child” for the injuries. She described ██████████ as “more verbal but with less hair.” ██████████ was diagnosed with Physical Child Abuse, Failure to Thrive, and Child Neglect (Malnourishment). ██████████ had substantial hair loss from malnutrition. She had patterned burn marks on the inside of her thighs. ██████████ had multiple splinters in her hands and feet that she stated was from “Dad” when she had asked for food and got food. ██████████ had sores in the webbing in the hand. There were circular burns to the thigh and there were additional burns to the right labia and supra-pubic area. ██████████ also had burns/blisters on her buttocks. ██████████ has “sizable” swelling to her left foot.

Both children told police, CJC personnel and hospital staff that they were hungry and thirsty. The children were excited for food and stated that they had been given frozen food. I also spoke with the paramedic who rode to Children’s Mercy with the girls. The paramedic, Nick Manley, advised that ██████████ told him that her dad cut her. Paramedic Manley advised that the girls were excited to leave the residence and said that they were locked in the back bedroom by their Dad during the initial call for service. He said ██████████ told him that Dad was not good to them and that they didn’t feel safe.

On 02/13/2021, I contacted ██████████ in the hospital. ██████████’s nurse advised that ██████████ was still confused, confrontational and disoriented. The nurse advised that there had been lab analysis ran on her labs which revealed that she had not been able to eat or drink in several days which could be the cause of ██████████’s behavior. ██████████ did not ask how the girls were doing or where they were but said, “I better get my girls back” before going back to her disoriented state. ██████████ advised that she was “not able to do nothing” as far as walking or mobility and has a wheelchair. ██████████ had a basketball sized blistered sore on her buttocks and a sore for an area approximately five by seven inches on her shoulder from the pressure sore. ██████████ was extremely lethargic and weak during my interaction with her.

During the investigation, Mr. Snow was not forthcoming with information and was attempting to conceal the fact that he left [REDACTED] in the bathtub for several days and left the girls unattended during that time. Mr. Snow stated that he had called "[REDACTED]" and had been in contact with "[REDACTED]", [REDACTED]'s mother and [REDACTED] after she was taken to the hospital to talk to her about the children. [REDACTED]'s mother stated that Mr. Snow contacted her to have her help clean up the apartment and take care of the children. There is a history of Children's Division involvement but at this time, it is still unknown what that involvement was.

On 02/13/2021 at 1330 hours, this Detective responded to the Child Protection Center for the forensic interview of [REDACTED] and [REDACTED]. I met with Jackson County Children's Division worker, Teri Reynolds who advised that she met with [REDACTED] and [REDACTED] earlier on 02/13/2021. Ms. Reynolds advised that the girls disclosed to her that Dad had tied [REDACTED] to a box spring with a white rope, pointing to the scar on her leg that PO Pickett and Children's Mercy observed. [REDACTED] disclosed that her Dad put a long-handled knife in her "privates" and [REDACTED] was there and saw when it happened. The girls disclosed that they had been locked in the closet in the back bedroom by Dad for a "very very long time" and they were "very hungry" while mom was stuck in the bathtub. The girls stated that Mom and Dad "choke" them with their hands around the girls' necks as punishment. The girls are not potty trained and disclosed to Ms. Reynolds that they were burned by their Mom with a lighter when they would have accidents. The girls told Ms. Reynolds that they knew that they had been locked in the bedroom for multiple days they could see the sun come up and it was not dark anymore. The girls knew it was a different day when Dad brought them a juice and a hot pocket it was dark outside. [REDACTED] told Ms. Reynolds that Dad was having her watch him hurt [REDACTED] as a punishment.

[REDACTED] was the first to have her forensic interview. [REDACTED] disclosed that both her Mom and Dad (identified as Bryan) choked her with their hands around her neck. [REDACTED] said that she "couldn't breathe" when she was being choked. [REDACTED] disclosed that her Dad used a knife and put it in her "bottom" and she "had blood." [REDACTED] told the interviewer that she is "worried about something to eat." [REDACTED] talked about being "stuck in the closet" by her Dad and she "clawed out" and pointed to her hands which had the splinters that were observed by CJC, PO Pickett and Children's Mercy Staff.

[REDACTED] was second to have her forensic interview. [REDACTED] advised that her Mom's name was [REDACTED] and Dad's name is Bryan. [REDACTED] disclosed that "Mommy was stuck in the tub" and "Mommy was screaming." [REDACTED] said that she was "stuck in the closet" because "Dad put us in the closet." [REDACTED] said that Dad "used a tied me with a rope" to keep her in the closet and said it was "a lot" when asked how many times her Dad did that to her. [REDACTED] disclosed that both of her parents choked her with their hands around her neck when she peed herself. [REDACTED] described that she was "having trouble breathing" when she was choked.

On 02/13/2021 at 1451 hours, Detective Sgt. Hughes responded to Blue Springs Police Department Detention Unit and provided Mr. Snow with his Miranda Rights. After being advised of his rights, Mr. Snow agreed to speak with Det Sgt. Hughes. Mr. Snow advised that they have been together since 2009 and the girls are their children in common. Mr. Snow said [REDACTED] is the person responsible for the most of abuse to the girls and he witnessed [REDACTED] use a dildo on the girls. Mr. Snow said that he feeds the girls and does his best to take care of them and [REDACTED]. Mr. Snow added that [REDACTED] wanted to take a bath on 02/10/21 and got stuck in the bathtub. Mr. Snow advised that he lived with [REDACTED] at the residence but didn't want police to know that because he didn't want [REDACTED] to be kicked out of the apartment.

Mr. Snow advised that he was at home with the girls the entire day and had lied to the police when they asked.

On 02/13/2021, Blue Springs Police Department detectives obtained search warrants for Mr. Snow's cell phone and for the apartment. During the search of the apartment, Det. Sgt. Hughes found the dildo in the pile of trash as Mr. Snow described. A long white shoe lace type of rope (as [REDACTED] described) was located wrapped and tied to the knob of the closet in the girls' bedroom. The apartment smelled of urine, feces and "dead body" as it was described to by the initial first responders. The apartment was covered in trash, fecal matter, clothing. It appeared that the closet in the girls' bedroom was the main area where the girls were living. The closet was full of little girls' dirty underwear and clothing soaked with urine and feces. There were feces smeared on the closet walls and appeared to have feces covered fingerprints and smears, scratch marks on the door frames. The floor of the apartment was covered in trash, mostly empty food wrappers and containers.

I spoke to [REDACTED]'s mother who advised that Children's Division had been involved in the girls' lives. Children's Division confirmed that there had been four hotlines regarding [REDACTED] and Mr. Snow and the abuse and neglect of the girls in 2020. Children's Division advised that [REDACTED] had the girls removed from her care due to domestic violence between her and Mr. Snow, but the girls were given custody back to [REDACTED] in 2017. The agreement between Children's Division and [REDACTED] was that she was not have contact with Mr. Snow. [REDACTED]'s mother advised that [REDACTED] is a high function autistic and Mr. Snow has been diagnosed with bi polar. [REDACTED]'s mother advised that she has not seen the girls since June of 2020.

The facts contained herein are true.

Detective Kate Tipton # 1884

/s/ Det. Kate Tipton#1884

13-Feb-2021 19:37

*Kenneth R. Garnett III*