

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

Police# 16-027925
Prosecutor# 095431623
1616-CR01527
OCN# W0009397

AMENDED COMPLAINT

STATE OF MISSOURI

vs.

**Courtenay S. Block
2631 Lawn Ave.
Kansas City, MO 64127
DOB: 03/13/1992; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted
Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y19840999.)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 565.021, RSMo, committed the **Class A Felony of Murder in the Second Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 21, 2016, in the County of Jackson, State of Missouri, S.K. (DOB 8/12/13) was killed by being shot as a result of the perpetration of the **Class C Felony of Endangering the Welfare of a Child** under Section 565.045, RSMo committed by the defendant on or about April 21, 2016, in the County of Jackson, State of Missouri.

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.

**Count II. Endangering The Welfare Of A Child Creating Substantial Risk - 1st Degree -
1st Offense - No Sexual Conduct (568.045-005Y20033899.0)**

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 C Felony of Endangering the Welfare of a Child in the First Degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about April 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life and body and health of S.K., (DOB 8/12/13), a child less than seventeen years old, by leaving an unattended, loaded firearm in close proximity to S.K.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years 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 five thousand dollars (\$5,000); 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).

**Count III. Abuse Or Neglect Of A Child - Resulting In Death Under Sec. 568.060.5(2)
(568.060-001Y20133899.)**

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 Neglect of a Child**, punishable upon conviction under Section 558.011, RSMo, in that on or about April 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused a child less than 14 years of age to be placed in a situation in which the child suffered physical injury as a result of neglect, in that defendant left an unattended, loaded firearm in close proximity to S.K. (DOB 08/12/13), and S.K. died as a result of injuries sustained from defendant's conduct.

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.

**Count IV. Tampering With Physical Evidence In Felony Prosecution (575.100-
001Y19755099.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **Class D Felony of Tampering with Physical Evidence**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about April 21, 2016, in the County of Jackson, State of Missouri, the defendant concealed a 9mm handgun with the purpose to impair its availability in the investigation of the shooting of S.K. (DOB 08/12/13), an official investigation, and thereby impaired and obstructed the prosecution of Courtenay Block for the crime of **Endangering the Welfare of a Child**, a felony.

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 two (2) years and not to exceed four (4) 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 five thousand dollars (\$5,000); 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).

Count V. Possession Of Up To 35 Grams Of Marijuana (195.202-003Y20093562.)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 195.202, RSMo, committed the **Class A Misdemeanor of Possession of a Controlled Substance**, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about April 21, 2016, in the County of Jackson, State of Missouri, the defendant possessed marijuana, a controlled substance, knowing of its presence and nature.

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 one thousand dollars (\$1,000); 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.

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

/s/Nichole Erickson

Nichole Erickson (#52086)
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WITNESSES:

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