

**IN THE CIRCUIT COURT
OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

Police# 16-010364
Prosecutor# 095436857
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Stephen W. Lundemo
3304 S. Sterling Avenue
Independence, MO 64052
DOB: 12/11/1980; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Assault/attempt Assault 2nd Degree On Law Enforcement Officer, Corrections Officer, Emergency Personnel, Highway Worker, Utility Worker Or Probation And Parole Officer By Means Other Than Deadly Weapon Or Dangerous Instrument/physical Injury (565.082-002Y20051313.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.082, RSMo, committed the class C felony of assault of a law enforcement officer in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about December 22, 2016, in the county of Jackson, State of Missouri, the defendant purposely placed P.O. David Ostendorf, a law enforcement officer, in apprehension of immediate serious physical injury, by threatening the officer with a firearm.

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.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about December 22, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of assault of a law enforcement officer in the second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant

committed the foregoing felony of assault of a law enforcement officer in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count III. Burglary 1st Degree (569.160-001Y19792202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about December 22, 2016, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at 2004 NE Wein Ave, Grain Valley MO and possessed by Nathan Struwe, for the purpose of committing stealing therein, and while in such building there was present in such building Nathan Struwe, a person who was not a participant in the crime.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. Assault 2nd Degree (565.060-001Y19841306.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.060, RSMo, committed the class C felony of assault in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about December 22, 2016, in the County of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to Nathan Struwe by striking him.

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.

Count V. Robbery 2nd Degree (569.030-001Y19791206.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.030, RSMo, committed the class B felony of robbery in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about December 22, 2016, in the County of Jackson, State of Missouri, the defendant forcibly stole a 2008 Mazda M6 owned by Joan Struwe.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count VI. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20054801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the class D felony of resisting a lawful stop, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about December 22, 2016, in the county of Jackson, State of Missouri, P.O. Edward Williams a law enforcement officer, was attempting to make a lawful stop of defendant, and the defendant knew or reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officers from effecting the stop, resisted the stop of defendant by fleeing from the officers and the defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that the defendant drove at high speeds in traffic.

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.

Count VII. Tampering With Motor Vehicle 1st Degree (569.080-002Y20052902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class C felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about December 22, 2016, in the county of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile 2008 Pontiac owned by Maria Corral-Loera.

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.

Count VIII. Tampering With Motor Vehicle 1st Degree (569.080-002Y20052902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class C felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about December 22, 2016] in the county of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile 2008 Mazda M6 owned by Joan Struwe.

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.

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.

THE STATE OF MISSOURI

vs.

Stephen W. Lundemo

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

DET Martin Kreissler , 1100 SW Smith, Blue Springs, MO 64015

DET Kevin Lange , 1100 SW Smith, Blue Springs, MO 64015

PO David Ostendorf , 1100 SW Smith, Blue Springs, MO 64015

PO Brandon ShROUT , 1100 SW Smith, Blue Springs, MO 64015

[REDACTED]

PO Michael Vieyera , 1100 SW Smith, Blue Springs, MO 64015

PO Dustin Walters , 1100 SW Smith, Blue Springs, MO 64015

STATEMENT OF PROBABLE CAUSE

| | | | |
|-------|------------|---------------------------------|--------------------------|
| DATE: | 12/22/2016 | Blue Springs Police Case Number | 2016-10364 2016-10367 |
|-------|------------|---------------------------------|--------------------------|

I **R. Martin Kreissler** a police officer with the **Blue Springs Missouri Police Department** 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 **12/22/2016, at approximately 4:41 am, at 2400 N.E. Coronado Drive, Blue Springs,** and at **8:33 am, at 2004 N.E. Wien Ave. Blue Springs, Jackson County, Missouri,** a **Stephen William Lundemo, a white male, date of birth 12/11/1980, SS# [REDACTED] LKN: 3304 S. Sterling Ave. Apt. 45, Independence, Missouri,** committed one or more criminal offenses.

2.) That the facts supporting this belief are as follows:

On **12/22/2016** at approximately **4:41 am**, while on patrol Blue Springs Missouri Police Officer **David Ostendorf** discovered in the area of 1500 Block of Coronado Drive, Blue Springs, Jackson County, Missouri, a reported stolen vehicle out of Independence, Missouri a 2008 Pontiac Grand Prix, Missouri vehicle license **DM2-Z3D**. Officer Ostendorf advised the Pontiac Grand Prix, which was reported as "white" had now been "spray painted black". Officer Ostendorf initiated a vehicle stop activating his vehicles overhead red-blue lights and siren in an attempt to stop the vehicle. The black Pontiac Grand Prix did not yield to Officer Ostendorf's emergency equipment and began traveling east on Coronado Drive into the City of Grain Valley, Jackson County, Missouri. Due to the speed of the vehicle Officer Ostendorf reported losing the vehicle in the Grain Valley area off of Coronado Drive and Officer Ostendorf discontinued pursuing the vehicle. A few minutes later Officer Ostendorf reported he had found the vehicle once again and pursued the vehicle traveled "west" on Coronado back to the Blue Springs Missouri area.

Assisting Blue Springs Missouri Police Officer **Dustin Walters**, was in the area traveling eastbound on Coronado Drive towards Grain Valley Missouri. Officer Ostendorf radioed Officer Walters to "watch out" the Pontiac Grand Prix was traveling without lights. As Officer Walters pulled to the side of the road the "black" vehicle drove past him at a "high rate of speed" and the cars' lights had just came on. Officer Walters saw a white male, brown hair, wearing a black coat driving the car. Officer Walters turned his police vehicle around and began to pursue the Pontiac Grand Prix with his emergency equipment operating. Shortly after Officer Walters began to pursue the Pontiac Grand Prix the driver of the Pontiac Grand Prix lost control of the car and ended up on the north side of the road, in the brush and trees, with the front end of the car facing south, across from Haldex Corporation, 2400 N.E. Coronado Drive, Grain Valley, Jackson County, Missouri.

As Officer Walters arrived he placed the cars' spotlight on the suspect's car. Officer Walters exited his patrol car as Officer Ostendorf arrived and parked his police vehicle to the west of Officer Walters patrol vehicle. The officers' began to give the driver of the car a white male verbal commands. Officer Walters reported the white male exited the Pontiac Grand Prix and it appeared he had pulled something from his waistband. The white male crouched down behind the driver's door and yelled at the officer "to stay back". As Officer Walters was giving verbal commands he heard what he believed to be a gun shot. Officer Walters would radio "shots fired" getting his rifle from his patrol car. Officer Walters moved to the passenger side of his police vehicle to gain a position of advantage. Officer Walters reports the white male began backing from the car. The white male jumped the barbed wire fence just to the north of where the Pontiac Grand Prix had come to rest. The officers pursued the white male as he ran north crossing Interstate I-70 east and west bound lanes of traffic. Various Kansas City Missouri Metropolitan Police Agencies including Troopers from the Missouri State Highway Patrol responded to the request of assistance by the Blue Springs Missouri Police Department to search for the white male.

Blue Springs Missouri Police Special Victim's Detective **R. Martin Kreissler** was called to investigate this assault. Detective Kreissler arrived at the recovered-stolen Pontiac Grand Prix, and the assault of the officers. During his investigation Detective Kreissler briefly spoke with Officer Ostendorf regarding the assault.

Officer Ostendorf said when the white male got out of the stolen Pontiac Grand Prix he saw the white male draw a gun from his right side, pointing the gun at the officers. Officer Ostendorf said the white male then crouch down behind the opened driver's door for cover. The white male was given numerous commands to show them his "hands". The white male produced his left hand up in the air in view of the officers but kept his right hand behind the opened driver's door. The officer's continued to give the white male commands to show them his "hands". The white male continued to keep his right hand concealed with his left hand up in the air as he bobbed up and down from behind the opened door. Officer Ostendorf said at one point when the white male bobbed up from behind the door Officer Ostendorf saw a weapon in the white male's right hand point in his direction. Ostendorf said he "feared" the white male was going to shoot him. Officer Ostendorf fired his weapon "one" time at the white male. The white male ducked down behind the driver's door once again. Officer Ostendorf said he was not certain what the white male was doing behind the door. Officer Ostendorf said seconds past and the white male moved north from driver's door and jumping the fence.

Detective Kreissler processed the area where the Pontiac Grand Prix rested. Detective Kreissler found on the ground just outside of the driver's door a light green-white camouflage "US" ammunitions harness type belt. Detective Kreissler found to the north of the rear of the Pontiac Grand Prix, in close proximity of the barbed wire fence which the white male climbed to flee, a Mossberg International 715T, 22 caliber long gun-rifle. Detective Kreissler found loaded in the long gun-rifle a magazine with several "live 22 caliber rounds" in the magazine. It was determined that the Pontiac Grand Prix was owned by **Maria Corral-Loera** and was stolen from her Independence, Mo address on December 21, 2016.

At approximately **0833 hours**, **Nathan C. Struwe** called the Blue Springs Missouri Police Department via "911" advising he had just been robbed while at his residence of **2004 NE Wien Ave Blue Springs, Jackson County, Missouri**. Nathan said the white male suspect stole his 2008 Dark Cherry Red, Mazda M6, 4-door, Missouri vehicle license FG7-K4C, VIN (Vehicle Identification Number) 1YNHP80C985M17102. The vehicle is actually owned by Nathan's mother, **Joan M. Struwe**.

The white male suspect drove through the police perimeter at NE 20th & Duncan Road refusing to stop for Kansas City Police Officer, Edward Williams and fled eastbound on Duncan Road to BB Highway in Grain Valley, then northbound on BB Highway. The vehicle continued northbound before turning left, westbound on Truman Road at a high rate of speed. The suspect turned right onto northbound M-7 Hwy then an immediate left onto westbound Truman Road to M-78 Hwy westbound. The suspect driver then turned right, northbound onto M-291 Hwy past 24-Hwy and then turned around southbound on M-291 Hwy to M-78 Hwy then right onto westbound.

Prior to reaching Noland Road, the suspect turned south then west on side streets eventually reaching Noland Road. Once at Noland Road, the suspect driver turned right, northbound then turned left, westbound onto M-78 Hwy where he was eventually stopped in the area of M-78 Hwy & Union Ave (Independence, Mo) and taken into custody from the stolen Mazda that was taken from Nathan.

The suspect driver drove recklessly at high rates of speed and showed no regard for other motorists throughout the whole chase while trying to elude police officers who were driving marked police units operating with their emergency lights and siren attempting to stop him. The suspect, was identified as a Stephen W. Lundemo, a white male, date of birth 12/11/1980. Stephen Lundemo had an active Jackson County Missouri Felony warrant for Receiving Stolen Property, #1616CR03905.

At approximately 0928 hours, Blue Springs Missouri Police Detective Kevin Lange responded to 2004 NE Wien Ave and made contact with Nathan. This interview was recorded on an Olympus digital recorder. The residence is located on the south side of Wien Ave, east of NE 20th Street and faces the north. The residence has a two car garage which is located on the south side of the residence.

Det. Lange made contact with Nathan who said he was asleep in his bedroom which is located at the northeast corner of the residence when he was awakened by his dog barking excitedly. Nathan said he got up and went into his parent's room which is across the hall (south east corner of the residence) and encountered a white male suspect kneeling on the south side of his parent's bed as if he was looking underneath the bed. The suspect was wearing a green blanket and carrying an iPad.

When the suspect saw Nathan he confronted him and told Nathan he "had a gun" and wanted his car keys. Nathan led the suspect back into his room to get the keys. The suspect then wanted Nathan's cell phone, so he gave the suspect a non-working phone.

Nathan said he then started punching the suspect in the back of his head causing him to fall into the closet doors located on the south side of the room. After the suspect got up, he started pushing Nathan down the hallway (westbound) into the front room. The suspect then started wrestling with Nathan, pinning Nathan to the floor between the couch and the north front room wall (west of the front door) and started "choking" Nathan.

The suspect eventually let Nathan up and "demanded" that he comes with him. Nathan asked if he could get dressed first in which the suspect allowed him, but prior to leaving the suspect asked for a glass of water. Nathan then led the suspect to the kitchen in the south west portion of the residence.

After giving the suspect a drink of water the suspect then took the lead to the front door with Nathan following; Nathan then pulled out a butcher knife and tried stabbing the suspect. Another altercation ensued within the residence and the suspect fled out the north door to the Mazda leaving behind the iPad and the green blanket. No one in the residence owns a green blanket.

The Mazda had been parked on the south side of the road facing the east. Nathan described the white male suspect somewhat balding on the top of his head, but had brown hair in the back of his head. Nathan went onto say the suspect had a brown goatee and was wearing light brown jacket, grayish or brownish pants with unknown type of brown shoes (possibly boots). Nathan said the white male suspect spoke with a nervous stutter.

Nathan's sister, **Heather J. Struwe** arrived home and discovered the suspect had been in her bedroom which is located on the north side of the residence, in the middle, just east of the front door. Several pieces of jewelry (rings and earrings) were missing which included her mother's class ring of 1981 and her own class ring from 2007. Heather also noted her iPod, 16G, with a purple case was also missing.

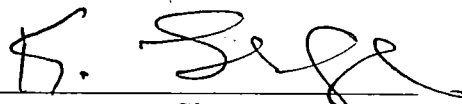
Through Det. Lange's investigation, it appears the suspect made an unlawful entry through an unlocked garage door which was located on the south side of the residence. Once in the garage, the suspect picked a bottle of water out of the refrigerator before walking upstairs.

Once upstairs and following the muddy footprints, it appears the suspect went into Heather's room first before going into the parent's master bedroom where he was encountered by Nathan.

With the prosecutor's permission, officer's forwarded a photograph of the suspect from the hospital and Nathan confirmed that in fact individual in the photograph was the same suspect who assaulted him and took his vehicle without permission.

The facts contained herein are true. False statements made herein are punishable by law.

Detective Kevin Lange
Printed


Signature

The Court Finds Probable Cause:

Date

Jackson County Missouri Judge