

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

POLICE NO. :	4200758
PROSECUTOR NO. :	095437481

STATE OF MISSOURI,	)	
	)	PLAINTIFF,
vs.	)	
ANDRE CHRISTOPHER BROWN	)	
1835 Kensington Ave.,	)	CASE NO. 1716-CR
Kansas City, MO - 64127	)	DIVISION
DOB: 02/20/1986	)	
Race/Sex: B/M;	)	
SSN: XXXXX	)	
	)	DEFENDANT.

COMPLAINT

Count I. Animal Abuse - By Torture And/or Mutilation While Animal Was Alive (578.012-002Y20175599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 578.012, RSMo, committed the **Class E Felony of Animal Abuse**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about January 13, 2017, in the County of Jackson, State of Missouri, the defendant purposely caused injury or suffering to a bulldog mix canine, and the injury or suffering caused was the result of torture or mutilation consciously inflicted by the defendant while the animal was alive.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years 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 (\$10,000); or by both imprisonment and a fine.

Count II. Animal Abuse - 1st Offense (578.012-001Y19835599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 578.012, RSMo, committed the **class A misdemeanor of Animal Abuse**, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about January 13, 2017, in the County of Jackson, State of Missouri, the defendant had a bulldog mix canine in his custody or ownership and knowingly failed to provide adequate care for the animal.

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 two

State vs. Andre Christopher Brown

thousand dollars (\$2,000); 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.

JEAN PETERS BAKER

Prosecuting Attorney

Jackson County, Missouri

by,

/s/ Katherine Baker Nelson

Katherine Baker Nelson (#62733)

Assistant Prosecuting Attorney

415 E. 12th Street, 11th Floor

Kansas City, MO - 64106

(816) 881-3560

kjbaker@jacksongov.org

WITNESSES:

James Donovan, Special Investigator, 2534 Prospect, Kansas City, Missouri

ACO Damon Goldston, 2534 Prospect, Kansas City, Missouri

ACO Virginia Fleming, 2534 Prospect, Kansas City, Missouri

Dr. Sarah Frei, Kansas City Pet Project, 4400 Raytown Road, Kansas City, Missouri

Kevin Winters, DVM, Blue Pearl Specialty and Emergency Pet Hospital, Lee's Summit, Missouri

Probable Cause Statement Form

Dated: 01/25/2017

Report # 4200758

I, James Donovan, a Special Investigator for the City of Kansas City, Missouri, knowing that false statements on this form are punishable by law, and that the facts contained herein are true, state as follows:

1. I have probable cause to believe that on 01/13/2017, at 1835 Kensington Ave in Kansas City, Jackson County, Missouri, Andre Christopher Brown, black male, DOB – 02/20/1986, committed one or more criminal offense(s).

[RSMO 578.009 Animal Neglect & RSMO 578.012 Animal Abuse]

2. The facts supporting this belief are as follows:

That on 01/13/2017 at 1145 hours, at the address of 1835 Kensington Ave; Kansas City, Jackson County, Missouri 64127, that Animal Control Officer Virginia Fleming had responded to the address in regards to animal cruelty investigation. It was alleged that a canine on the property did not have any food, water or shelter.

During the course of the investigation, Officer Fleming observed a pitbull mix, male, tan/white with a chain around its neck, and with the head under the fence. Officer Fleming described the dog to have deep wounds to the neck, which had been caused by the chain around the canine's neck. Officer Fleming describes the backyard to be full of debris and dried up feces.

Officer Fleming stated that the canine had chewed up what appeared to be pillows and blankets, which had surrounded the dog. Officer Fleming observation of the canine, she stated that the dog was extremely thin, and emaciated to the point where you can see the ribs.

At this time, since Officer Fleming was not able to remove the chain around the canine's neck, due to the chain being padlocked together, she requested an additional animal control officer to respond to the scene.

Animal Control Officer Damon Goldston arrived on the scene at 1159 hours, and entered the backyard through an open back fence. Officer Goldston advised that he observed an unknown sex, white/tan dog that had been chained to the fence. Officer Goldston described the canine to be emaciated and lying on the ground. He furthermore described the canine to be entangled in a way where the dog's head was pinned to the fence and could not move. Officer Goldston advised that the dog was missing hair and old wounds around the neck.

Probable Cause Statement Form

Officer Goldston advised the area where the dog was found was unclean, with no water or food and no dog house. At this time Officer Goldston had to retrieve bolt cutters from his vehicle to remove the chain that was extremely tight around the dog's neck. The dog was placed on a leash and the chain was removed, the dog began seizing and shaking and not responsive to touch or sound. The canine was not able to walk on its own.

Officer Goldston then had to carry the canine to Officer Fleming's truck for transport to the animal shelter.

Officers Fleming and Goldston then made contact with the residence at 1835 Kensington Ave, Kansas City, MO 64127. An unidentified black female, answered the door and stated that the dog was not her dog. The female then stated that she never goes into the backyard. The female stated that the dog belonged to her cousin from Dallas, Texas whose name was Andre Brown and she stated that she didn't know where he lived. She did provide his cell number, which was given as [REDACTED]. Officers had asked the female how long the animal had been in the backyard, she replied 3-4 weeks.

A police response had been started before making contact with the residence, since making contact with the unidentified female, since she was cooperative; the police response was then cancelled.

Officer Fleming had requested identification from the female, who was later identified as Shalonda Robertson, Black Female, DOB- 12/19/1987, who resides at 1835 Kensington Ave, Kansas City, MO 64127, with phone number (816) [REDACTED]

Officer Goldston arrived back at the address at 1540 hours, because he had been contacted by Shalonda Robertson. She had advised that the dog owner was at the residence. Officer Goldston then made contact with a black male, whom was not able to produce any identification, but did provide his information, and a computer check confirmed the information what the suspect had provided.

Officer Goldston then identified the animal owner as Andre Christopher Brown, black male, DOB- 2/20/1986, Social Security number # [REDACTED] with Missouri DL # Z203120003, who stated that his mailing address is 1835 Kensington Ave, Kansas City, MO 64127, and his phone number [REDACTED] or [REDACTED].

Officer Goldston had asked Mr. Brown about the condition of his dog. Mr. Brown could not tell him about the dog. Mr. Brown was advised the he would be cited for the animal cruelty violations; his response was that he wanted to know if he could go get the dog and take it to another cousin's house. At this time Officer Goldston informed Mr. Brown that the animal would not be released back to him.

Probable Cause Statement Form

During the course of my investigation, I had received medical reports from Kansas City Pet Project, and Blue Pearl Specialty & Emergency Pet Hospital.

KANSAS CITY ANIMAL SHELTER

Kansas City Pet Project had indicated that on January 13, 2017 that they had received the animal and was given animal identification number # A34417769 and the name of the dog was "King".

Dr. Sarah Frei examined the canine and provided the following examination report.

She states that it was an animal control emergency, dog was found in tangled tether with airway/breathing impaired. She further states that the dog was laterally recumbent and unresponsive. On presentation temperature was too low to register; Body weight was 40 pounds, heart rate 80 BPM; respiratory rate 40 BPM and shallow; Mucous membranes are white/tacky, dog is unconscious and experiencing petit mal seizures. Dog was severely emaciated with BCS less than 1/9. Severely dehydrated with sunken eyes and delayed skin turgor. Emergency stabilization is initiated and humane euthanasia is also considered. IV catheter with 500 cc LRS bolus with 50% Dextrose ml added. Aggressive warming initiated. In house blood work and additional test performed. Midazolam administered IV due to seizures. After approximately 30 minutes, patient began to regain consciousness, lifted head, showed interest in food. Temperature would not register for 1 hour post warming. Initial temperature to register was 91 degrees. The animal was then transferred to Blue Pearl for overnight critical care. Temperature at time of transfer was 95 degrees.

BLUE PEARL SPECIALTY & EMERGENCY PET HOSPITAL

On 1/13/17 at 2038 hours, Blue Pearl was presented "King", a 3 year old and 6 months, neutered male, Bulldog mix canine for continued care.

Physical Exam: Temp: 98.2 Pulse: 150 Resp: 32 MM: Pink CRT: <2 sec Wt: 41.2 pounds

It was noted that the dog's general appearance was emaciated; attitude: QAR; Eyes/Ears/Nose/Throat/Mouth: WNL; Integumentary: old wounds over the neck; Musculoskeletal: Decrease muscle mass; Respiratory: WNL- no coughing, sneezing, or discharge. Lungs clear bilaterally; Circulatory: WNL- normal rhythm, pulses are strong and synchronous, no pulse deficits detected. Heart normal with auscultation; Abodomen: Benign, no pain on palpation or masses evident.

Probable Cause Statement Form

Blue Pearl assessment indicated that the animal was emaciated, had old wounds, and was hypoglycemia. Blue Pearl therapy included Normosol R 2.5% dextrose 100 mls/hr/cri; using warming blankets; and provided intermittent feedings, and monitor blood glucose. Provided supportive care through weekend.

On 1/14/17 the canine was discharged and transferred back to Kansas City Pet Project for continued care.

Shalonda Robertson had knowledge of the animal at the property located at 1835 Kensington Ave, Kansas City, MO 64127. She states that the animal was at the property location for at least 3-4 weeks to a month.

Mrs. Robertson advised that Andre Brown moved into the residence again back in December 2016 and brought the dog with him. Mrs. Robertson had stated that she was aware of the canine being in the backyard of her residence.

Mrs. Robertson further describes seeing the dog, and knew the dog had a tight chain around the canine's neck, and had instructed Andre Brown to try and find something to remove the chain.

Mrs. Robertson also had indicated that upon her first time seeing the canine it was showing its ribs but still had some body weight.

Mrs. Robertson had been providing Andre Christopher Brown a place to stay, and then got into an argument and asked him to leave the property. Andre Christopher Brown had failed to remove the dog. Since Mr. Brown had left the property, Mrs. Robertson failed to provide any care to the dog, and failed to notify animal control that the animal had been abandoned at the location.

Shalonda Robertson failed to provide any necessary food, water or shelter to the canine. She also failed to provide any medical care to the dog.

According to the statement provided by Shalonda Robertson, she states that Andre Brown was responsible for feeding, watering and maintaining animal care for the canine.

Officer Goldston was able to confirm that Andre Brown was the animal owner of the canine. Shalonda Robertson stated that Andre Brown, was last seen at the address on January 3 or January 4, 2017 had not returned back to the address until January 13, 2017.

Mr. Brown had failed to provide necessary food, water or shelter to the canine. Mr. Brown also failed to provide any medical care to the dog.

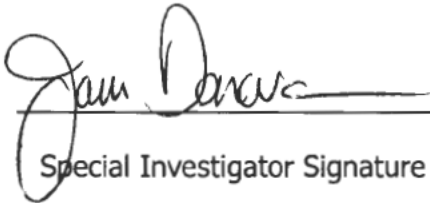
Probable Cause Statement Form

At this time, this investigator has no further information on the whereabouts of Andre Christopher Brown.

This statement is true to the best of my knowledge.

James Donovan #8175

Special Investigator


Special Investigator Signature

The court finds probable cause and directs the issuance of a warrant this day

_____ of _____.

Judge

Circuit Court of _____ County, State of Missouri.

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

POLICE NO. :	4200758
PROSECUTOR NO. :	095437479

STATE OF MISSOURI,	)	
	)	PLAINTIFF,
vs.	)	
SHALONDA ROBERTSON	)	
1835 Kensington Ave.,	)	CASE NO. 1716-CR
Kansas City, MO - 64127	)	DIVISION
DOB: 12/19/1987	)	
Race/Sex: B/F;	)	
SSN: XXX-XX-2425	)	
	)	DEFENDANT.

MISDEMEANOR INFORMATION

In the Circuit Court of Jackson County, Missouri, at Kansas City James Donovan, Special Investigator, 2534 Prospect, Kansas City, Missouri
ACO Damon Goldston, 2534 Prospect, Kansas City, Missouri
ACO Virginia Fleming, 2534 Prospect, Kansas City, Missouri
Dr. Sarah Frei, Kansas City Pet Project, 4400 Raytown Road, Kansas City, Missouri
Kevin Winters, DVM, Blue Pearl Specialty and Emergency Pet Hospital, Lee's Summit, Missouri
, Term, 2017. In Division Number ____ thereof, designated by the rules of said Court as Criminal Division_____.

Count I. Animal Abuse - 1st Offense (578.012-001Y198355990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 578.012, RSMo, committed the **class A misdemeanor of animal abuse**, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that on or about January 13, 2017, in the County of Jackson, State of Missouri, the defendant had a bulldog mix canine in her custody and knowingly failed to provide adequate care for the animal.

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 two thousand dollars (\$2,000); 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

State vs. Shalonda Robertson

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 a summons be issued as provided by law.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/Katherine Baker Nelson

Katherine Baker Nelson (#62733)
Assistant Prosecuting Attorney
415 E. 12th Street, 11th Floor
Kansas City, Missouri 64106
(816) 881-3560
kjbaker@jacksongov.org

WITNESSES:

James Donovan, Special Investigator, 2534 Prospect, Kansas City, Missouri
ACO Damon Goldston, 2534 Prospect, Kansas City, Missouri
ACO Virginia Fleming, 2534 Prospect, Kansas City, Missouri
Dr. Sarah Frei, Kansas City Pet Project, 4400 Raytown Road, Kansas City, Missouri
Kevin Winters, DVM, Blue Pearl Specialty and Emergency Pet Hospital, Lee's Summit, Missouri

Probable Cause Statement Form

Dated: 01/25/2017

Report # 4200758

I, James Donovan, a Special Investigator for the City of Kansas City, Missouri, knowing that false statements on this form are punishable by law, and that the facts contained herein are true, state as follows:

1. I have probable cause to believe that on 01/13/2017, at 1835 Kensington Ave in Kansas City, Jackson County, Missouri, Shalonda Robertson, black female, DOB – 12/19/1987, committed one or more criminal offense(s).

[RSMO 578.009 Animal Neglect & RSMO 578.012 Animal Abuse]

2. The facts supporting this belief are as follows:

That on 01/13/2017 at 1145 hours, at the address of 1835 Kensington Ave; Kansas City, Jackson County, Missouri 64127, that Animal Control Officer Virginia Fleming had responded to the address in regards to animal cruelty investigation. It was alleged that a canine on the property did not have any food, water or shelter.

During the course of the investigation, Officer Fleming observed a pitbull mix, male, tan/white with a chain around its neck, and with the head under the fence. Officer Fleming described the dog to have deep wounds to the neck, which had been caused by the chain around the canine's neck. Officer Fleming describes the backyard to be full of debris and dried up feces.

Officer Fleming stated that the canine had chewed up what appeared to be pillows and blankets, which had surrounded the dog. Officer Fleming observation of the canine, she stated that the dog was extremely thin, and emaciated to the point where you can see the ribs.

At this time, since Officer Fleming was not able to remove the chain around the canine's neck, due to the chain being padlocked together, she requested an additional animal control officer to respond to the scene.

Animal Control Officer Damon Goldston arrived on the scene at 1159 hours, and entered the backyard through an open back fence. Officer Goldston advised that he observed an unknown sex, white/tan dog that had been chained to the fence. Officer Goldston described the canine to be emaciated and lying on the ground. He furthermore described the canine to be entangled in a way where the dog's head was pinned to the fence and could not move. Officer Goldston advised that the dog was missing hair and old wounds around the neck.

Probable Cause Statement Form

Officer Goldston advised the area where the dog was found was unclean, with no water or food and no dog house. At this time Officer Goldston had to retrieve bolt cutters from his vehicle to remove the chain that was extremely tight around the dog's neck. The dog was placed on a leash and the chain was removed, the dog began seizing and shaking and not responsive to touch or sound. The canine was not able to walk on its own.

Officer Goldston then had to carry the canine to Officer Fleming's truck for transport to the animal shelter.

Officers Fleming and Goldston then made contact with the residence at 1835 Kensington Ave, Kansas City, MO 64127. An unidentified black female, answered the door and stated that the dog was not her dog. The female then stated that she never goes into the backyard. The female stated that the dog belonged to her cousin from Dallas, Texas whose name was Andre Brown and she stated that she didn't know where he lived. She did provide his cell number, which was given as (816) 491-5930. Officers had asked the female how long the animal had been in the backyard, she replied 3-4 weeks.

A police response had been started before making contact with the residence, since making contact with the unidentified female, since she was cooperative; the police response was then cancelled.

Officer Fleming had requested identification from the female, who was later identified as Shalonda Robertson, Black Female, DOB- 12/19/1987, who resides at 1835 Kensington Ave, Kansas City, MO 64127, with phone number (816) 490-3490.

Officer Goldston arrived back at the address at 1540 hours, because he had been contacted by Shalonda Robertson. She had advised that the dog owner was at the residence. Officer Goldston then made contact with a black male, whom was not able to produce any identification, but did provide his information, and a computer check confirmed the information what the suspect had provided.

Officer Goldston then identified the animal owner as Andre Christopher Brown, black male, DOB- 2/20/1986, Social Security number #449-77-5267, with Missouri DL # Z203120003, who stated that his mailing address is 1835 Kensington Ave, Kansas City, MO 64127, and his phone number (816) 491-5930 or (918) 360-6127.

Officer Goldston had asked Mr. Brown about the condition of his dog. Mr. Brown could not tell him about the dog. Mr. Brown was advised the he would be cited for the animal cruelty violations; his response was that he wanted to know if he could go get the dog and take it to another cousin's house. At this time Officer Goldston informed Mr. Brown that the animal would not be released back to him.

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BLUE PEARL SPECIALTY & EMERGENCY PET HOSPITAL

On 1/13/17 at 2038 hours, Blue Pearl was presented "King", a 3 year old and 6 months, neutered male, Bulldog mix canine for continued care.

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It was noted that the dog's general appearance was emaciated; attitude: QAR; Eyes/Ears/Nose/Throat/Mouth: WNL; Integumentary: old wounds over the neck; Musculoskeletal: Decrease muscle mass; Respiratory: WNL- no coughing, sneezing, or discharge. Lungs clear bilaterally; Circulatory: WNL- normal rhythm, pulses are strong and synchronous, no pulse deficits detected. Heart normal with auscultation; Abodomen: Benign, no pain on palpation or masses evident.

Probable Cause Statement Form

Blue Pearl assessment indicated that the animal was emaciated, had old wounds, and was hypoglycemia. Blue Pearl therapy included Normosol R 2.5% dextrose 100 mls/hr/cr; using warming blankets; and provided intermittent feedings, and monitor blood glucose. Provided supportive care through weekend.

On 1/14/17 the canine was discharged and transferred back to Kansas City Pet Project for continued care.

Shalonda Robertson had knowledge of the animal at the property located at 1835 Kensington Ave, Kansas City, MO 64127. She states that the animal was at the property location for at least 3-4 weeks to a month.

Mrs. Robertson advised that Andre Brown moved into the residence again back in December 2016 and brought the dog with him. Mrs. Robertson had stated that she was aware of the canine being in the backyard of her residence.

Mrs. Robertson further describes seeing the dog, and knew the dog had a tight chain around the canine's neck, and had instructed Andre Brown to try and find something to remove the chain.

Mrs. Robertson also had indicated that upon her first time seeing the canine it was showing its ribs but still had some body weight.

Mrs. Robertson had been providing Andre Christopher Brown a place to stay, and then got into an argument and asked him to leave the property. Andre Christopher Brown had failed to remove the dog. Since Mr. Brown had left the property, Mrs. Robertson failed to provide any care to the dog, and failed to notify animal control that the animal had been abandoned at the location.

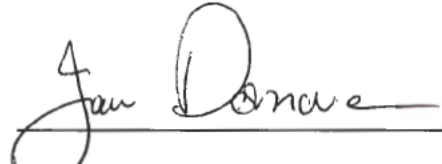
Shalonda Robertson failed to provide any necessary food, water or shelter to the canine. She also failed to provide any medical care to the dog.

Probable Cause Statement Form

This statement is true to the best of my knowledge.

James Donovan #8175

Special Investigator


Special Investigator Signature

The court finds probable cause and directs the issuance of a warrant this day

_____ of _____.

Judge

Circuit Court of _____ County, State of Missouri.