

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-000396
PROSECUTOR NO. :	095440360

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
LEO DOWTHARD IV)	
1540 Emmanuel Cleaver Ii Blvd,)	CASE NO. 1716-CR
Kansas City, MO - 64130)	DIVISION
DOB: 01/07/1978)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
)	DEFENDANT.

COMPLAINT

**Count I. Endangerng Corrections Employee/visitor/another Offender By
Attempt/knowingly Expose Person To Hiv/hepatitis B Or C (575.155-
003Y20171399.0)**

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 575.155, committed the class D of endangering a correcton employee, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about January 16, 2017, in the County of Jackson, State of Missouri, the defendant attempted to cause or knowingly caused C.O. ██████████ a Jackson County Correction Officer, to come into contact with urine, and defendant is infectedwith hepatitis C.

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 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.

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.

State vs. Leo Dowthard IV

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Michael J. Hunt
Michael J. Hunt (#34818)
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WITNESSES:

DET Terry Edwards , 3310 NE Rennau, Lees Summit, MO - 64064

STATEMENT OF PROBABLE CAUSE

JCSD CASE NUMBER 17-00394

DATE 0619/2017

I, Detective Terry Edwards, a deputy with the Jackson County, Missouri Sheriff's Department, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 01/06/2017, at 1300 Cherry Ave. Kansas City, Missouri, (JCDC) which is inside the boundaries of Jackson County, Missouri, Dowthard, Leo (NMI), a black male, DOB 01/07/1978, committed one or more criminal offenses.
- 2) The facts supporting this belief are as follows:

On 01/16/2017, at approximately 1230 hours, Jackson County Sheriff's Office Deputy Sgt. D. Blodgett was dispatched to the Jackson County Detention Center (JCDC) in reference to an assault. Upon arrival, Blodgett contacted Corrections Officer (C/O) [REDACTED], who stated that he had been assaulted by inmate Dowthard, Leo Jr., a black male, date of birth (DOB) 01/07/1978.

Blodgett interviewed [REDACTED] who stated that while conducting his duties as a Correction's Officer, he passed Dowthard's cell door, at which time Dowthard threw a cup of liquid, later determined by odor to be urine, on him, coating his right arm, and upper hip area. [REDACTED] stated that this is a common problem when dealing with Dowthard; that he had a history of assaulting Corrections Officers by throwing urine and feces at them. [REDACTED] stated that he believed that up to five (5) other corrections officers had been assaulted in the same manner by Dowthard. [REDACTED] believed that Dowthard was positive for the Hepatitis C virus, which he knew to have capability to be transferred through contact with bodily fluids.

As Blodgett was interviewing [REDACTED] C/O Watson, Anthony E., a black male, DOB 04/21/1970 stated that he was traveling approximately 6 feet behind [REDACTED], and as he passed by Dowthard's cell was also assaulted by urine being thrown by Dowthard

I contacted the Medical Unit at JCDC and obtained documentation that Dowthard was in fact listed in JCDC documents as having been diagnosed with the Hepatitis C virus.

DET. T. EDWARDS #92

Detective Terry Edwards 92/0235
Jackson County, Missouri Sheriff's Department

The court finds probable cause

Judge