

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

POLICE NO. :	18-045933
PROSECUTOR NO. :	095446447
OCN:	AN017777

STATE OF MISSOURI,

PLAINTIFF,

vs.

CARLOS E ALANIZ

525 Stonearch #921

Independence, MO 64052

DOB: 10/23/1998

Race/Sex: H/M

[REDACTED]

DEFENDANT.

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CASE NO. 1816-CR

DIVISION

COMPLAINT

Count I. Abuse Or Neglect Of A Child - Serious Emotional Or Physical Injury - No Sexual Contact (568.060-006Y20123899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.060, RSMo, committed the class B felony of abuse or neglect of a child, punishable upon conviction under Section 558.011, RSMo, in that on or about June 30, 2018, in the County of Jackson, State of Missouri, the defendant was eighteen years of age or older, and knowingly caused [REDACTED], a child less than eighteen years of age, to suffer physical injury as a result of abuse by striking him and, the injury inflicted was serious physical injury.

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. A person convicted of this offense is not eligible for probation or parole until the defendant has served not less than five years of such sentence.

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.

State vs. Carlos E Alaniz

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/ Erin Hunt

Erin Hunt (#59061)
Assistant Prosecuting Attorney
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Independence, MO 64050
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WITNESSES:

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. DET Jason Clancy, 223 N. Memorial Drive, Independence, MO 64050
3. [REDACTED]
4. CST Jason Myers, 223 N. Memorial Drive, Independence, MO 64050
5. DET Steven Schmidli, 223 N. Memorial Drive, Independence, MO 64050
6. [REDACTED]
7. PO Stephen Summers, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 7/1/2018

Report #: 2018-45933

I, Christopher Burris, a Detective with the Independence, 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 6/30/2018, at approximately 1700 hours, Carlos E. Alaniz, (Race- W, Sex- M, DOB- 10/23/1998, Address-525 Stone Arch Drive, Independence, Missouri 64052, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 06/30/2018 at 1829 hours, Independence Police Officer Stephen Summers was dispatched to the Pediatric Intensive Care Unit inside Children's Mercy Hospital, 2401 Gillham Road, Kansas City, Missouri in reference to child abuse that occurred at 525 Stonearch Drive, Apartment # 921 in Independence, Missouri 64052.

Upon arrival, Officer Summers contacted officers with the Kansas City, Missouri Police Department who had originally been dispatched to on the child abuse offense but later learned that the offense actually occurred in Independence MO. The child victim was identified as [REDACTED]. (w/m, 6-16-2017). The biological mother was identified as [REDACTED] resided at 525 Stonearch Drive, Apartment # [REDACTED] with her boyfriend, Carlos Alaniz. Mr. Alaniz was not related to the child victim. KCPD Officers advised that the child victim was in critical condition with life threatening injuries. The injuries to the child victim were identified by medical staff as child abuse and not accidental. Officer Summers alerted his patrol supervisor at which time, detectives with the IPD Criminal Investigations Unit responded to Children's Mercy for follow-up investigation.

Detective Steve Schmidli responded to the hospital and was briefed by Officer Summers on the incident. Detective Schmidli learned from medical staff that the child victim was brain dead and on a ventilator. They advised that the child victim possibly had internal bleeding and his body was covered with bruises. Detective Schmidli observed the child victim to have numerous bruises to his head, chest and abdomen as he was being treated by medical staff.

Detective Christopher Burris responded and conducted a field interview with the victim's biological mother, [REDACTED]. [REDACTED] She identified victim as her biological son and identified his biological father as [REDACTED]. She confirmed that she and Mr. Alaniz have been in complete care and custody of the victim for the past week. [REDACTED] advised that earlier this afternoon, she was in the kitchen of her apartment and observed her oldest son (2 ½ years old) straddling the victim and "pouncing" up and down on the victim's chest and stomach on the living room floor. She stated that she immediately stopped her oldest son and checked on the victim. [REDACTED] claimed that he appeared fine. She stated that she fed the victim and eventually placed him in his crib for a nap. She advised that Mr. Alaniz was home in the living room at the time of this incident involving her oldest son and the victim. [REDACTED] stated that she drove to a gas station near I-435 and Truman Road to get some soda and left Mr. Alaniz at the residence with the two children. She advised that she quickly returned home and was preparing to leave with the boys and go to her mother's residence. [REDACTED] advised that she went to pick up the victim in his crib and immediately noticed that he looked pale and had bluing lips. She stated that she picked up the victim and immediately panicked and called her mother about his condition. She stated that her mother instructed her to take him to the hospital. She advised that they got into Mr. Alaniz's SUV and started driving towards Centerpoint Medical Center. [REDACTED] stated that she was holding the victim and noted that Mr. Alaniz drove. She advised that they got lost in Kansas City, Missouri and advised that she called 911 for help as the victim's health was deteriorating. She confirmed that

KCPD and paramedics responded and rushed the victim to Children's Mercy Hospital for emergency medical attention. [REDACTED] felt the injuries to the victim were attributed to her oldest son "pouncing" on him and claimed that she never observed any other injuries to her son.

Mr. Alaniz voluntarily agreed to respond to IPD Headquarters and provide the investigation with a formal statement about the incident. Detective Schmidli interviewed Mr. Alaniz who identified [REDACTED] as his girlfriend of ten months and noted that they live together at 525 Stonearch Drive, Apartment # 921 with her two sons. He advised that he does not have any children from his relationship with [REDACTED] or other relationships. He confirmed that [REDACTED] was the biological father of [REDACTED]'s sons. Mr. Alaniz confirmed that he and [REDACTED] have been in complete care and custody of the victim for the past week. Mr. Alaniz advised that earlier this afternoon, he was in his bedroom with [REDACTED] along with the two boys. He stated that he noticed the older boy bouncing up and down on the victim's stomach and face with his buttock. He stated that this incident occurred on the oldest boy's mattress which was on their bedroom floor. He advised that he alerted [REDACTED] to the oldest boy's actions and claimed that she got up and spanked the oldest boy. He advised that he picked up the victim and placed him in his crib but did not notice any health issues with the victim. He stated that they went into the living room while the victim remained in his crib. He advised that he played his video games and a short time later they prepared to take the boys to [REDACTED]'s mother for the evening. He advised that he picked up the victim and noticed that he looked pale and had some bruises on his face. He advised that he alerted [REDACTED] about the victim's condition and she immediately called her mother. Mr. Alaniz stated that they got into his SUV and [REDACTED] drove. He noted that he sat in the front seat and held the victim. He confirmed they got lost and called 911 for help as the victim's health was getting worse. Mr. Alaniz felt the injuries to the victim were attributed to [REDACTED]'s older son bouncing on him on the mattress.

Due to the discrepancies in Mr. Alaniz's statement and [REDACTED] statement, Detective Schmidli advised Mr. Alaniz of the Miranda rights, at which time, he stated that he understood them, then signed the form. Detective Schmidli and Detective Burris confronted Mr. Alaniz on the differences between his account of the incident and [REDACTED] account of the incident. Detectives confronted Mr. Alaniz with the fact that the victim's injuries were classified as child abuse by medical staff and were not caused by the victim's brother bouncing on him. Mr. Alaniz softly denied any wrongdoing and refused to blame [REDACTED] for the victim's injuries. Mr. Alaniz had no explanation on how the victim received the injuries. After a lengthy conversation, Mr. Alaniz was taken into custody and escorted to the IPD Detention Unit where he was booked under an investigative hold for child abuse.

On 07/01/2018 at approximately 1136 hours, Detectives Chris Burris and Jason Clancy interviewed Mr. Alaniz after he requested to speak with investigators again. Mr. Alaniz was re-read his Miranda rights. Mr. Alaniz waived his rights and spoke with investigators.

Mr. Alaniz initially stated that he lied and was covering for [REDACTED]. Mr. Alaniz advised he witnessed [REDACTED] trying to suffocate the victim. Upon further questioning Mr. Alaniz was asked to submit to a lie detector test. Mr. Alaniz then admitted that he was responsible for the injuries to the victim. Mr. Alaniz admitted to punching the victim at least six or seven times in the torso on 06/30/2018 because he wouldn't stop crying. Mr. Alaniz was asked to demonstrate how he punched the victim on his leg. Mr. Alaniz was observed by Detectives Burris and Clancy to punch his leg in an extremely forceful manner. Mr. Alaniz admitted the abuse began at the beginning June 2018. The victim admitted that he would slap, hit and kick the victim in his head. Mr. Alaniz also admitted to causing the bruises on the victim's body. Mr. Alaniz was asked if he ever admitted this to [REDACTED], and he advised no because he did not want her to know he was "beating her kid up." Mr. Alaniz agreed that he did not like the

fact that the victim looked like the victim's biological father and he did not like the victim's biological father very much.

At times during the interview, Detective Clancy received updates from Children's Mercy Hospital. The victim was reported to have a lacerated liver and several broken ribs. Detective Clancy was also informed that the victim had "brain slowing" which was explained to him to be indicative of previous brain injuries.

Detective Christopher Burris # 1401

/S/ Christopher Burris

Print Name

Signature