

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

POLICE NO. :	18-045933
PROSECUTOR NO. :	095446559
OCN:	

STATE OF MISSOURI,)
) **PLAINTIFF,**)
vs.)
))
JORDEN N. SCHULENBERG)
921 Stone Arch Drive) **CASE NO. 1816-CR**
Independence, MO 64052) **DIVISION**
DOB: 11/16/1997))
Race/Sex: W/F))
[REDACTED]))
) **DEFENDANT.**)

COMPLAINT

**Count I. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree
- 1st Offense - No Sexual Conduct (568.045-005Y20173806.0)**

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 D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about June 30, 2018, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED], a child less than seventeen years of age, by failing to seek medical treatment for [REDACTED]

The range of 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. 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.

State vs. Jorden N. Schulenberg

Count II. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20173806.0)

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 D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about June 30, 2018, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED], a child less than seventeen years of age, by leaving the child unattended with Carlos Alaniz.

The range of 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. 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.

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/ Erin Hunt
Erin Hunt (#59061)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3388
ehunt@jacksongov.org

WITNESSES:

1. Carlos E Alaniz, 921 Stone Arch Drive, Independence, MO 64052
2. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
3. DET Stephen Cook, 223 N. Memorial Drive, Independence, MO 64050
4. DET Emily Knox, 223 N. Memorial Drive, Independence, MO 64050
5. [REDACTED] /o Jackson County Prosecutor's Office, Independence, MO 64050
6. DET Steven Schmidli, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 7/10/2018

Report: #2018-45933

I, Steve Schmidli, 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 about 1700 hrs, Jorden N. Schulenberg (Race – W, Sex - F, DOB: 11-16-97, [REDACTED] [REDACTED] Last Known Address: 525 Stonearch Drive [REDACTED], Independence MO 64052) Committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this believe are as follows:

On 6-30-2018 at 1829 hrs., P.O. Stephen Summers was dispatched to the Pediatric Intensive Care Unit inside Children's Mercy Hospital located at 2401 Gillham Road, KCMO in reference to a severe child abuse that occurred at 525 Stonearch Drive [REDACTED] in Independence MO.

Upon arrival, P.O. Summers contacted officers with the Kansas City MO Police Department whom 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 Jorden Schulenberg whom resided at 525 Stonearch Srive [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. P.O. Summers alerted his patrol supervisor at which time, detectives with the IPD Criminal Investigations Unit responded to Children's Mercy for follow-up investigation.

Det. Steve Schmidli responded to the hospital and was briefed by P.O. Summers on the incident. They advised that the child victim possibly had internal bleeding and his body was covered with bruises. I observed the child victim to have numerous bruises to his head, chest and abdomen as he was being treated by medical staff.

Det. Christopher Burris responded and interview the biological mother, Jorden Schulenberg. She identified [REDACTED] as her biological son and identified his biological father as [REDACTED]. She noted that she is currently separated from [REDACTED]. and lives at 525 Stonearch Dr [REDACTED] with her current boyfriend, Carlos Alaniz. She confirmed that Mr. Alaniz and her have been in complete care and custody of [REDACTED]. for the past week. Ms. Schulenberg advised that earlier this afternoon, she was in the kitchen of her apartment and observed her oldest son (w/m, 9-8-2015) straddling [REDACTED]. and "pouncing" up and down on [REDACTED]'s stomach on the living room floor. She stated that she immediately stopped her oldest son and checked on [REDACTED]. and claimed that he appeared fine. She stated that she feed [REDACTED] 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 [REDACTED]. Ms. Schulenberg stated that she drove to a gas station near I-435 and Truman Road to get some groceries 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. Ms. Schulenberg advised that she went to pick up [REDACTED] in his crib and immediately noticed that [REDACTED] looked pale and had bluing lips. She stated that she picked up [REDACTED] and immediately panicked and called her mother about [REDACTED]'s condition. She stated that he 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. Ms. Schulenberg stated that she was holding R.L. and noted that Mr. Alaniz drove. She advised that they

got lost in Kansas City MO and advised that she called 911 for help as [REDACTED]'s health was deteriorating. She confirmed that KCPD and Kansas City Fire Department paramedics responded and rushed [REDACTED] to Children's Mercy for emergency medical attention. Ms. Schulenberg felt the injuries to [REDACTED] were attributed to Roman "pouncing" on him and claimed that she never observed any other injuries to her son.

Later on that evening at 2242 hrs., Det. Burris and Det. Schmidli interviewed Carlos Alaniz in reference to the incident involving [REDACTED]. Mr. Alaniz's account of the incident was not constant with Ms. Schulenberg's statement at the hospital. Due to the discrepancies in Mr. Alaniz's statement, 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 7-1-2018 at 0043 hrs., Ms. Schulenberg responded to the IPD Investigations Unit for a formal statement on the offense. After being advised of her rights, Ms. Schulenberg was informed of the inconsistencies between her hospital statement and Mr. Alaniz's formal statement at IPD Headquarters. Ms. Schulenberg denied ever seeing Mr. Alaniz physically abuse [REDACTED] but mentioned that she had seen [REDACTED] with some bruising in the past and questioned Mr. Alaniz on it. Ms. Schulenberg acknowledged that she had some concerns but claimed that Mr. Alaniz denied any wrongdoing and identified [REDACTED]'s older sibling as the culprit for any bruising.

On 7-9-2018, Det. Emily Knox contacted [REDACTED] [REDACTED] in reference to the child abuse investigation. Ms. [REDACTED] identified herself as the paternal great aunt to [REDACTED]. Ms. [REDACTED] provided the investigation with some photographs from 5-7-2018 which showed [REDACTED] with multiple bruising to the back of his head, his lower back and buttocks. She stated that Ms. Schulenberg told their family at the time that the bruising was actually a "rash".

On 07-10-2018, Detective Burris interviewed KCFD EMT Diane Hollinger. Ms. Hollinger was the EMT of KCFD Medic # 33 who responded to treat and transport [REDACTED] on the day of the incident. EMT Hollinger stated that upon arrival she believed the child victim was dead. EMT Hollinger stated that the child victim had noticeable bruises on his head. She reported that the victim's penis and perineum were discolored and the victim was discharging blood from his penis. EMT Hollinger advised that she drove the ambulance to Children's Mercy Hospital and noted that Ms. Schulenberg rode in front cab of the ambulance to the hospital. EMT Hollinger reported that Schulenberg said that she was not going to get in trouble for something her three year old did. EMT Hollinger added that Schulenberg told her that they had been riding around for a couple of hours and the victim was not acting right which contradicted Schulenberg's statements to IPD detectives. EMT Hollinger advised that Ms. Schulenberg was "stone cold," not crying and spent a lot of time on her phone during the ride to the hospital.

On 7-10-2018 at 0943 hrs., Ms. Schulenberg responded to IPD Headquarters to discuss the offense with Det. Schmidli and Det. Knox. After being advised of her rights, she again showed inconsistencies in her statement to detectives. Ms. Schulenberg stated that she left the apartment briefly to get some groceries at a gas station just to the west of her apartment complex and was only gone for approximately 10 minutes. She stated that [REDACTED] was left in the care and custody of Mr. Alaniz and was physically fine with no apparent injuries. She advised that upon returning home, she went into the bedroom and discovered [REDACTED] to be limp and bluing lips. She also noted that she observed bruises on [REDACTED]'s head. Ms. Schulenberg immediately called 911 from her apartment in Independence MO and talked to a dispatcher but claimed that the dispatcher never gave her any specific instructions. She advised that they left the apartment and noted that she kept the dispatcher on the phone as they drove to a hospital. Ms. Schulenberg denied that she ever had any suspicion that Mr. Alaniz was abusing [REDACTED] but noted that in May 2018, she had an "uneasy feeling" about [REDACTED]'s bruising. She claimed that anytime she questioned Mr. Alaniz about some bruises on [REDACTED], he would deny any wrongdoing and "explain it away" as being her oldest son's fault.

Det. Steve Schmidli #842

/s/ Steve Schmidli #842

Print Name

Signature