# IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

POLICE NO.	: 17-013815
PROSECUTOR NO.	: 095448400
OCN	V:
STATE OF MISSOURI,	) AINTIFF, )
vs.	)
ALLEN T. BLOODWORTH	)
5631 E 31st St	) CASE NO. 1916-CR
Kansas City, MO 64128	) <b>DIVISION</b>
DOB: 10/12/1977	)
Race/Sex: W/M	)
	)
DEFF	ENDANT. )
COM	

# COMPLAINT WARRANT REQUESTED

Count I. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 7, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1G11A5SA8GU148008, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count II. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 8, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1FAHP3K20CL333175, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count III. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 28, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN YS3EH49GX33001030, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

#### Count IV. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002

and 558.011, RSMo, in that on or about April 28, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 3FA6P0H71HR293030, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count V. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 13, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely of Revenue Form 4669, relating to vehicle a VIN 1G1JC524817240987, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

#### Count VI. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 14, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN JTKKT604250104639, knowing that it had been completed so that it purported to have been

made by authority of one who did not give such authority.

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.

## Count VII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about May 14, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN WBABM5347YJP00402, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count VIII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 18, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 5NPDH4AE2FH647698, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count IX. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 18, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating vehicle to a VIN 5NPEB4ACXDH523082, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count X. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 23, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 3GNFK16Z33G320677, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XI. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 23, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Revenue Form 4669. relating to a vehicle Department VIN 3B7HF13Y7TG183258, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 24, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 2C3HE66G33H507488, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

#### Count XIII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002

and 558.011, RSMo, in that on or about August 10, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1G4HP54K9Y4254135, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

# Count XIV. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 10, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1G1PC5SH3C7162943, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XV. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 10, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed

VIN 2G1WG5EK8B1137054, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XVI. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 17, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1FTFW1ET1BKD31985, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XVII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 2G1WX15K259208716, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

# Count XVIII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 2G4WS52JXY1320882, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XIX. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue 4669, relating to vehicle with listed Form a VIN 1G1JB5SH9C4209158, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

# Count XX. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 2T2ZK1BA0BC056358, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XXI. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1FMYU03181KF33629, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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 Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 20, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to vehicle listed VIN 1HGEM22964L019630, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XXIII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 8, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 3FAFP3132YR191387, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

# Count XXIV. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 8, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to

defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN JF1GH6D67BH802905, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XXV. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 8, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 5YFBURHE5HP607904, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

#### Count XXVI. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 13, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1B7HC13Z91J505427, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XXVII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 13, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1G2ZG58B674199939, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XXVIII. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 13, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN KMHFG4JG5EA385285, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XXIX. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 14, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 4T1BF3EK2BU666626, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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.

## Count XXX. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 16, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 3VWVA7AT5CM642605, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority

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.

## Count XXXI. Forgery (570.090-001Y20172589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 17, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine a writing, namely Department of Revenue Form 4669, relating to a vehicle with listed VIN 1HGCP26309A072461, knowing that it had been completed so that it purported to have been made by authority of one who did not give such authority.

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 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/ D. Paul Heddings II
D. Paul Heddings II (#69127)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-1357
DPHeddings@jacksongov.org

## **WITNESSES:**

- 1. DET David J. DeLaMare, 1125 Locust, Kansas City, MO 64106
- 2. DET Christopher L. Millsap, 1125 Locust, Kansas City, MO 64106
- 3. Sarah Mudd, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

4. John W. Speakman, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

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Dute: 07 27 2010				Tr 0130	313
T. D					
I, Detective Christopher Millsap #4284					
(Name and identify law enforcement officer	, or person ha	ving information	on as probable c	ause.)	
knowing that false statements on this for	m are punis	shable by law	, state that th	e facts contained	I herein are true.
I have probable cause to believe that on	02-04-17		, at 5631 E.	31 <sup>st</sup> St.	in
•		ate)	, <u> </u>	(Address)	
Kansas City, JACKSON COUNTY	Missouri	ALLEN T.	BLOODWO	RTH	
(County)	-		(Name	of Offender(s))	
W/M 10-12-77			committed o	ne or more crim	inal offense(s).
(Description of Identity	y)				
Related CRN's #17-068161, #17-1904	12, #17-564	48, #18-0302	260		

The facts supporting this belief are as follows:

Date: 09-27-2018

Private Party Impound LLC is a private towing company, located at 5631 E. 31 St. in Kansas City, Jackson County, Missouri, and operated by ALLEN T. BLOODWORTH. Pursuant to Missouri law, specifically Section 304.157.4, RSMo., the owner of real property, lessee of real property, a property manager, or a security manager can authorize a towing company to remove a vehicle that has been abandoned on the real property so long as the owner, lessee, property manager, or security manager is present at the time the vehicle is towed. As part of the authorization process for the towing of an abandoned vehicle, Section 304.157, RSMo., requires that the owner, lessee, property manager, or security manager complete an abandoned property report, or what is known as the Department of Revenue Form 4669 ("Form 4669"). Form 4669 requires several pieces of information. First, the form requires information on the vehicle to be towed. The form also requires the name and signature of the owner, lessee, property manager, or security manager to show compliance with 304.157.4. Finally, the form requires the name and signature of the tow operator who is removing the vehicle. Pursuant to Section 304.157, RSMo., the tow operator must send the completed Form 4669 to the local law enforcement agency in order to determine whether the vehicle has been reported stolen.

During the month of February 2017, it came to my attention that BLOODWORTH, along with his employees, were illegally towing abandoned vehicles from private property. For these tows, the Form 4669 was completed and submitted to local law enforcement using the name and signature of either John Speakman or Sarah Mudd as the "owner, lessee, or property or security manager" authorizing and witnessing the tow. Forms bearing these names and signatures were used to tow over 280 vehicles from various locations throughout the Kansas City metropolitan area.

On 06-09-17, I contacted and interviewed John Speakman. He stated in March or April of 2015, he was an apartment manager for Kirktown Apartments, located in south Kansas City, MO, near Longview and Food Lane. He stated he contacted Private Party Impound, as he needed two vehicles towed from the apartment complex. Speakman stated he met with BLOODWORTH, signed a contract and had the vehicles towed. Speakman stated when he signed the contract, his signature was captured on an iPhone with a stylus pen. He stated he did not

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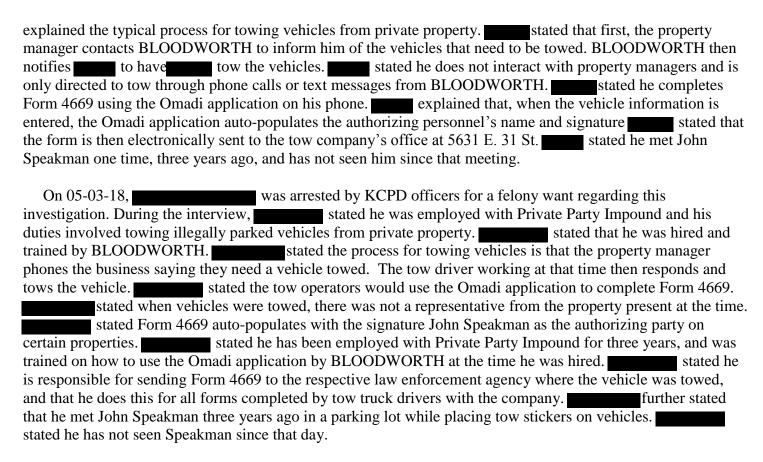
receive a copy of the contract. Speakman stated on 03-15-18, BLOODWORTH called Speakman on his cell phone, asked where Speakman was at, and stated that he was getting ready to come hunt Speakman down. Speakman stated BLOODWORTH wanted to meet with him at a Denny's restaurant in Raytown, MO and that he told Speakman it was "very important." Speakman did not meet with BLOODWORTH. Speakman stated that, other than the phone call described above, he has had no contact with BLOODWORTH or authorized any vehicles to be towed since 2015. Speakman further stated that he owns a security company and has two employees who patrol various private properties and businesses. Speakman stated management has asked them to tow illegally parked cars when necessary. He stated the procedure was to phone the police department and verify the vehicle is not stolen. If the vehicle is not stolen, the employee places a green sticker on the windshield showing that the owner has 48 hours to repair or move the vehicle. Speakman stated if the vehicle has not been moved or repaired, he advised management of the vehicle and it became management's responsibility to phone a tow truck and authorize the removal of the vehicle. Speakman stated he has not personally authorized a vehicle to be towed verbally, nor has he signed any forms authorizing a vehicle be towed, since early 2015. Speakman added that he did not give permission for BLOODWORTH to use his signature for any purpose, to include authorizing the tow of vehicles from private property, and will assist with prosecution.

On 01-05-18, I contacted Sarah Mudd who stated she was the President for the Center for the Developmentally Disabled located at 1010 W. 39th St. Mudd stated the organization had recently relocated, but still owned the 39th street property. Mudd stated she signed a towing contract with Private Party Impound in February 2017 to remove illegally parked cars on the property. Mudd stated she has never signed a form authorizing the tow of any specific vehicle from her property. Mudd was then presented with a copy of the Department of Revenue Form 4669 that had been submitted bearing her signature. Mudd stated she has never seen the form before and that the signature was not hers. Mudd stated when she signed the contract with Private Party Impound, she signed a hard copy. Mudd stated she did not receive a copy of the contract. Mudd stated she did not give permission for BLOODWORTH to use her signature for any purpose, to include authorizing the tow of vehicles from private property, and will assist with prosecution.

I then contacted Special Agent Mike Fryer of the Missouri Department of Revenue. SA Fryer was asked to explain the proper way to legally complete the Department of Revenue Form 4669 (Abandoned Property Report.) He stated the form 4669 has specific instructions written for each section, A, B and C, directing how to legally tow and remove abandoned vehicles from private property. SA Fryer stated section A of the form must be completed by the property owner, lessee, or property or security manager for each vehicle towed, and that person must witness the removal of the vehicle. SA Fryer advised that the form clearly states the authorizing party has to certify that the form was completed properly and that all information on the form was accurate and true by signing the form. SA Fryer stated if a tow company was copying and pasting the signature of a representative from private property, they were violating the instructions on the form. SA Fryer stated that Form 4669 clearly states that the certification is a legal declaration subject to criminal penalties, which would include penalties for providing false information, forging signatures, and any other inaccurate or misleading actions or statements.

On 03-08-18, was arrested by KCPD officers for a felony want regarding this investigation. During his interview, stated he was employed with Lenders Recovery and his duties involved towing vehicles from private property. stated he was hired by BLOODWORTH three years ago. explained that BLOODWORTH had trained him, but did not train him on how to complete Form 4669.

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On 09-07-18, BLOODWORTH voluntarily responded to East Patrol, accompanied by his attorney, for questioning. BLOODWORTH stated he does not own Private Party Impound or Lender's Recovery, however he owns 100% of the shares in the company. BLOODWORTH stated that the he has filed "all kinds of different DBA's," and stated that there are approximately fifty different companies he has that are all towing-related. BLOODWORTH stated that one is a real estate holding company, another is a towing company, and another is a lender's recovery company, but that each has a separate and distinct affiliation with the property located at 5631 E. 31 St. BLOODWORTH stated he does not have employees but instead employs independent contractors for the business. BLOODWORTH stated he pays his contractors by check or cash and refused to answer questions regarding whether 1099's or tax documents are completed for these contractors. BLOODWORTH stated that when a vehicle is towed from private property, a representative is always present to sign Department of Revenue Form 4669, but that sometimes when it's a parking garage, the tow operator is simply directed to the area of the car by the person working the booth at the exit. BLOODWORTH stated he met Mr. Speakman approximately five years ago but did not elaborate as to why or how they met. BLOODWORTH stated the last time he had spoken to Mr. Speakman was approximately six months ago regarding his business. During the interview, BLOODWORTH confessed to possessing three stolen autos at his tow lot, intentionally removing them from his secured business lot, and parking them in an open lot across the street from his business.

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During this investigation, 30 vehicles have been identified as having been towed using a Form 4669 bearing BLOODWORTH's name and alleged signature as the tow operator and bearing John Speakman's name and alleged signature as the authorizing party. They are as follows:

1 - 2012 Ford Focus	1FAHP3K20CL333175	4/8/2017	3927 Willow Ave
2 - 2003 Saab 9-5 Aero	YS3EH49GX33001030	4/28/2017	1532 Grand
3 - 2017 Ford Fusion	3FA6P0H71HR293030	4/28/2017	1532 Grand
4 - 2001 Chevrolet Cavalier	1G1JC524817240987	5/13/2017	7100 Eastwood Trfwy
5 - 2005 Scion xA	JTKKT604250104639	5/14/2017	2500 Independence Ave
6 - 2000 BMW 328C	WBABM5347YJP00402	5/14/2017	2500 Independence Ave
7 - 2015 Hyundai Elantra	5NPDH4AE2FH647698	6/18/2017	1940 Woodland
8 - 2013 Hyundai Sonata	5NPEB4ACXDH523082	7/18/2017	1318 E 89th St
9 - 2003 Chevrolet K1500	3GNFK16Z33G320677	7/23/2017	800 Grand
10 - 1996 Dodge Ram 1500	3B7HF13Y7TG183258	7/23/2017	800 Grand
11 - 2003 Chrysler 300	2C3HE66G33H507488	7/24/2017	1922 Baltimore
12 - 2000 Buick Le Sabre	1G4HP54K9Y4254135	8/10/2017	8700 Buckingham Ln
13 - 2012 Chevrolet Cruze	1G1PC5SH3C7162943	8/10/2017	8700 Buckingham Ln
14 - 2011 Chevrolet Impala	2G1WG5EK8B1137054	8/10/2017	8700 Buckingham Ln
15 - 2011 Ford F150	1FTFW1ET1BKD31985	8/17/2017	1704 Grand
16 - 2005 Chevrolet Monte Ca	arlo 2G1WX15K259208716	8/20/2017	500 E 3rd St
17 - 2000 Buick Century	2G4WS52JXY1320882	8/20/2017	500 E 3rd St
18 - 2012 Chevrolet Sonic	1G1JB5SH9C4209158	8/20/2017	500 E 3rd St
19 - 2011 Lexus RX350	2T2ZK1BA0BC056358	8/20/2017	2500 Independence Ave
20 - 2001 Ford Escape	1FMYU03181KF33629	8/20/2017	500 E 3rd St
21 - 2004 Honda Civic	1HGEM22964L019630	8/20/2017	4815 Independence Ave
22 - 2000 Ford Focus	3FAFP3132YR191387	9/8/2017	3927 Willow Ave
23 - 2011 Subaru Impreza	JF1GH6D67BH802905	9/8/2017	500 E 3rd St
24 - 2017 Toyota Corolla	5YFBURHE5HP607904	9/8/2017	4017 Blue Ridge Cutoff
25 - 2001 Dodge Ram 1500	1B7HC13Z91J505427	9/13/2017	5417 E 96th Place
26 - 2007 Pontiac G6	1G2ZG58B674199939	9/13/2017	5417 E 96th Place
27 - 2014 Hyundai Azera	KMHFG4JG5EA385285	9/13/2017	5417 E 96th Place
28 - 2011 Toyota Camry	4T1BF3EK2BU666626	9/14/2017	11540 Holiday Dr
29 - 2012 Volkswagen Beetle	3VWVA7AT5CM642605	11/16/2017	5600 E 84th Terr
30 - 2009 Honda Accord	1HGCP26309A072461	11/17/2017	11540 Holiday Dr

During this investigation, one vehicle has been identified as being towed using a Form 4669 bearing BLOODWORTH's name and signature as the tow operator and bearing Sarah Mudd's name and alleged signature as the authorizing party. That vehicle is listed below.

1- 2016 Chevrolet Malibu LS 1G11A5SA8GU148008 4/07/2017 1010 W. 39<sup>th</sup> St.

In addition to the 2017 incidents listed above, Bloodworth has been known to continue to be in possession of numerous stolen vehicles. For example, on March 27, 2019, a search warrant was executed on Private Party

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Impound LLC, at 5631 E. 31 St. During the search, sixteen vehicles on the property were identified as having been reported stolen. Additionally, in September 2019, a replevin action was attempted to repossess four tow trucks from BLOODWORTH's tow lot. It was discovered that those trucks had been dismantled, severely hindering the lawful replevin. The information above shows that BLOODWORTH has been engaged in deceptive and illegal business practices for several years. The events of March and September 2019 indicate that the specific forgeries enumerated above are not standalone issues, and that BLOODWORTH continues to engage in practices harmful to the community. To protect the community from further deceptive and illegal business practices, I request that a warrant be issued in this case.

Printed Name	Det Chris Millsap #4284	Signature
The Court finds	s probable cause and directs the issuance	of a warrant this day of
	Judg	e
	Circuit Court of	County, State of Missouri.