

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

Police# 16-071592
Prosecutor# 095435128
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Alannis J. Bremer
11572 Homes Rd. Apt. #102
Kansas City, MO 64131
DOB: 09/01/1997; Race/Sex: W/F;
SS# [REDACTED]
Defendant.

Count I. Involuntary Manslaughter 1st Degree - Operate Motor Vehicle While In An Intoxicated Condition - Cause The Death Of A Non passenger/two Or More Persons/blood Alcohol Content .18% Or More - 1st Offense (565.024-004Y20050909.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo, committed the **class B felony of involuntary manslaughter in the first degree**, punishable upon conviction under Sections 565.024 and 558.011, RSMo, in that on or about September 24, 2016, in the county of Jackson, State of Missouri, the defendant, while under the influence of alcohol, caused the death of [REDACTED] by striking him with a motor vehicle when operating a motor vehicle with criminal negligence in that the defendant failed to maintain the proper lane of traffic, and [REDACTED] was not a passenger in the vehicle operated by the defendant.

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.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

THE STATE OF MISSOURI

vs.

Alannis J. Bremer

**Count II. Assault 2nd Degree - Operate Vehicle While Intoxicated - Resulting In Injury
(565.060-002Y19841399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.060, RSMo, committed the **class C felony of assault in the second degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about September 24, 2016, in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol and acted with criminal negligence in that the defendant failed to maintain the proper lane of traffic and caused physical injury to Shelly Lockett by colliding with a vehicle in which the victim was an occupant.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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,

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

PROBABLE CAUSE STATEMENT FORM

Date: 09-24-2016

CRN: 16-071592

I, **Det. K. Richardson #4290**

(Name and identify law enforcement officer, or person having information as probable cause.)

knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 09-24-2016, at I-435 & 103rd Street in

Kansas City, Jackson Missouri, Alannis J. Bremer W/F 09-01-1997
(County) (Date) (Address) (Name of Offender(s)) (Description of Identity)

committed one or more criminal offense(s).

Vehicular Manslaughter/ DUI

The facts supporting this belief are as follows:

On 09/24/2016 at 0302 hours, Kansas City, Missouri Police Officers responded to 103rd Street and Interstate 435, Kansas City, Jackson County, Missouri in regard to an injury crash involving two motor vehicles and a pedestrian. A white, 2013 Volkswagon Passat bearing Missouri license plate SK8X6V, which was being operated by Alannis J Bremer, (W/F, 09/01/1997), was traveling westbound on Interstate 435. As the Volkswagon got to the 103rd Street exit, it left the roadway and traveled on the right shoulder and struck the right rear of a black, 2012 Cadillac Escalade bearing Missouri license plate U4G0D2 and the back seat passenger/pedestrian, who was standing outside the Cadillac. The Cadillac was parked on the right shoulder to allow the back seat passenger/pedestrian to exit the vehicle because he was feeling ill. The Volkswagon then tumbled through the trees and terrain and landed on its roof down in the ditch of the ramp to 103rd Street. The pedestrian, [REDACTED] (W/M, 11-04-1991) was thrown into the treeline and was pronounced dead at the scene. BREMER and the driver of the Cadillac, Lockett, Shelly (B/F, 10/28/1965) were transported to area hospitals with non-life threatening injuries.

I responded to the hospital and contacted the driver of the Cadillac, Mrs. Lockett. She stated she pulled to the shoulder of I-435 westbound at 103rd Street to allow her rear seat passenger to exit the vehicle to vomit. While she was stopped on the shoulder she looked in her rearview mirror and observed a white vehicle driving at a high rate of speed approaching her vehicle. She advised it appeared the driver of the white vehicle might exit onto 103rd Street, but struck the rear of her vehicle and the pedestrian, who was standing on the shoulder by the rear passenger side of her vehicle.

While at the hospital, I contacted BREMER. BREMER stated she was driving westbound on I-435, when she fell asleep and ended up crashing her vehicle at 103rd Street. BREMER admitted to drinking 4 beers prior to the crash. BREMER stated, "It was probably not a good idea", "I totally admit that."

A computer check of BREMER revealed her to be valid through Missouri DOR.

Printed Name

Det. K. Richardson #4290

Signature

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.