

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

Associate Division _____

F I L E D

JUN 28 2023

STATE OF MISSOURI,

Plaintiff,

vs.

STEVEN ALLEN JORDAN,

Defendant.

Case No. 2331-CR01735

OCN#

PA File No. 077476949

**CIRCUIT CLERK
GREENE COUNTY**

FELONY COMPLAINT

COUNT I

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about January 20, 2023, in the County of Greene, State of Missouri, Victim 1 was killed by blunt force injuries as a result of the perpetration of the class B felony of driving while intoxicated under Section 577.010, RSMo, as alleged in Count VII, committed by the defendant on or about January 20, 2023, in the County of Greene, State of Missouri.

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

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

COUNT II

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about January 20, 2023, in the County of Greene, State of Missouri, Victim 2 was killed by blunt force injuries as a result of the perpetration of the class B felony of driving while intoxicated under Section 577.010, RSMo, as alleged in Count VII, committed by the defendant on or about January 20, 2023, in the County of Greene, State of Missouri.

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

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

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COUNT III

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about January 20, 2023, in the County of Greene, State of Missouri, Victim 3 was killed by blunt force injuries as a result of the perpetration of the class B felony of driving while intoxicated under Section 577.010, RSMo, as alleged in Count VII, committed by the defendant on or about January 20, 2023, in the County of Greene, State of Missouri.

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

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

COUNT IV

In the alternative to Count I, the Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of in the alternative to Count I, Section 577.010, committed the class B felony of driving while intoxicated, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused the death of Victim 1 by colliding with a vehicle in which Victim 1 was an occupant, and Victim 1 was a person 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.

COUNT V

In the alternative to Count II, the Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of in the alternative to Count II, Section 577.010, committed the class B felony of driving while intoxicated, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused the death of Victim 2 by colliding with a vehicle in which Victim 2 was an occupant, and Victim 2 was a person 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.

COUNT VI

In the alternative to Count III, the Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of in the alternative to Count III, Section 577.010, committed the class B felony of driving while intoxicated, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene,

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State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused the death of Victim 3 by colliding with a vehicle in which Victim 3 was an occupant, and Victim 3 was a person 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.

COUNT VII

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 577.010, committed the class B felony of driving while intoxicated, punishable upon conviction under Sections 558.011, and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, defendant operated a motor vehicle while under the influence of alcohol.

Defendant is a habitual offender and shall not be eligible for parole until eighty-five percent of the sentence is served, and is required to serve a minimum of two years before being eligible for probation or parole in that:

1. On or about February 15, 1984, defendant was found guilty of driving while intoxicated, for events occurring on October 5, 1983, in the Circuit Court of Greene County, Missouri, and
2. On or about December 22, 1981, defendant was found guilty of driving while intoxicated, for events occurring on September 26, 1981, in the Circuit Court of Greene County, and
3. On or about July 21, 1978, defendant was found guilty of driving while intoxicated, for events occurring on May 29, 1978, in the Circuit Court of Greene County, Missouri, and
4. On or about June 17, 1977, defendant was found guilty of driving while intoxicated, for events occurring on June 17, 1977, in the Circuit Court of Greene County, Missouri, and
5. On or about December 9, 1976, defendant was found guilty of driving while intoxicated, for events occurring on November 27, 1976, in the Circuit Court of Greene County, Missouri.

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.

COUNT VIII

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 577.010, committed the class D felony of driving while intoxicated, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused serious physical injury to Victim 4.

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 one (1) year 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

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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

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 577.010, committed the class D felony of driving while intoxicated, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused serious physical injury to Victim 6.

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 one (1) year 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

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 577.010, committed the class E felony of driving while intoxicated, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused physical injury to Driver 2.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) 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

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 577.010, committed the class E felony of driving while intoxicated, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused physical injury to Passenger 1.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) 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

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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

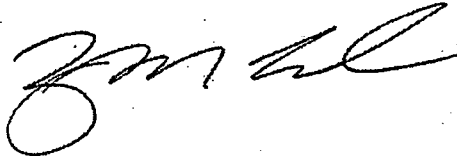
The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 577.010, committed the class E felony of driving while intoxicated, punishable upon conviction under Sections 558.002, 558.011 and 577.010, RSMo, in that on or about January 20, 2023, at or near James River Freeway and West Bypass, in the County of Greene, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of the road and as a result caused physical injury to Victim 5.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed four (4) 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 probable cause statement concerning this matter, which statement is made a part hereof and is submitted herewith as a basis upon which this court may find the existence of probable cause for the issuance of the warrant.

WHEREFORE, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

DAN PATTERSON
Prosecuting Attorney of the County of
Greene, State of Missouri, by



Electronically Signed;

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