

**In the Circuit Court of the State of Oregon  
for Multnomah County**

\_Verified Correct Copy of Original 10/29/2021.\_

STATE OF OREGON,

Plaintiff,

v.

SHARDA BREANNA MCDONALD

also known as  
SADE MCDONALD

also known as  
SHARDEE B GATSON

also known as  
SHARDAE B GATSON

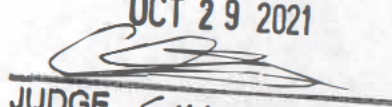
DOB:

Defendant(s).

Court Nbr 21-CR-52831 DA 2441411-1  
Crime Report GP 21-45510  
GP 21-29463

AFFIDAVIT OF PROBABLE CAUSE  
TO SUPPORT CONTINUED DETENTION  
OF DEFENDANT

**FILED**  
**OCT 29 2021**  
**CIRCUIT COURT**

PROBABLE CAUSE  
 FOUND  NOT FOUND  
**OCT 29 2021**  
  
JUDGE SINLAPAS A-I

I, John F. Casalino, swear that I am a Deputy District Attorney for Multnomah County and that I have reviewed the police reports which have been filed in this case by police officers; that the crimes charged against defendant(s) occurred in Multnomah County and that the probable cause for detention following the arrest of defendant(s) is as follows:

On 10/28/21 GPD [REDACTED] responded on a welfare check to [REDACTED] because of a report of a mom putting her baby in the freezer. Upon arrival outside of the residence, the officer heard someone (ultimately identified as the defendant) yelling to someone on the phone (ultimately identified as the baby's father Kendrick Neal). The defendant said yelled, among other things, "I'm about to show you real quick. You don't want him? . . ." "Let me show you about this little [REDACTED] baby, I don't fucking give [REDACTED] about". Officer Kerbs knocked on the door and the talking stopped and about a minute later the defendant answered the door, holding a child wrapped in a blanket.

Defendant, Sharda Brianna McDonald, told the officer that she was not trying to hurt, harm or kill her son, [REDACTED] - Kendrick Neal [REDACTED] by drowning him/or putting him in the freezer. The officer explained that there were some pictures or videos.

Kendrick Neal came to the scene and showed Officer Kerbs photos of a video call with the defendant. The officer says that the pictures show the defendant "holding [REDACTED] by his oneie and water boarding [REDACTED]." The officer writes, "it looked like [REDACTED] was trying to hold his breath while water was pouring over his face . . ." The officer further observes that in another picture defendant "was holding [REDACTED] by the onesie but at a downward angel, where his hip, legs and feet were higher than his head (almost upside down) with water running over his face. The only place the water could go (in that picture) was in his nose (at that angle)."

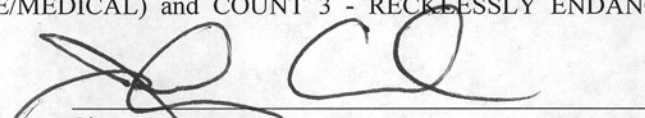
The officer told defendant she was under arrest and advised her of her Miranda rights which she indicated she understood. While the officer was driving the defendant to jail, she said she was sorry. She did that to test to see if Mr. Neal "gave a [REDACTED] at all" and she thought putting [REDACTED] under running water would make Mr. Neal come back to her residence. She admitted doing that out of spite.

This morning, I spoke to Dr. Dan Leonhardt, Child Pediatrician at CARES NW. I read a portion of Officer Kerb's report describing what the officer saw in the photos regarding the child. Dr. Leonhardt told me that given these circumstances, the child would be unable to breathe. Furthermore, because of the inability to protect the child's airway this causes a great risk of asperation of water into the child's lungs. This could have serious and life-threatening complications.

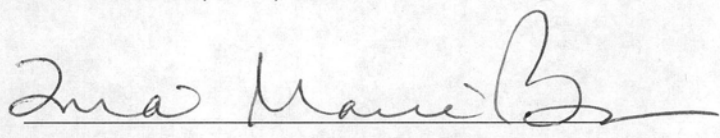
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I believe there is probable cause to believe the defendant, **SHARDA BREANNA MCDONALD**, has committed the crime(s) of: COUNT 1 - CRIM MISTREATMENT I (CAUSING PHYSICAL INJURY), COUNT 2 - CRIM MISTREATMENT I (WITHHOLDING FOOD/CARE/MEDICAL) and COUNT 3 - RECKLESSLY ENDANGERING ANOTHER PERSON.

Date 10/29/21

  
Signature  
John F. Casalino, DDA, OSB# 970394

SUBSCRIBED AND SWORN TO BEFORE ME ON THE ABOVE DATE:





Notary Public For Oregon: My Commission Expires: 12/15/2023  
 Deputy Clerk of the Circuit Court  
 Judge of the Circuit Court

AFFIDAVIT OF PROBABLE CAUSE