


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	2018-085127
PROSECUTOR NO. :	095449193
OCN:	

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
MICHAEL T. DUMAS)	
30201 E. State Route VV)	CASE NO. 1816-CR
Pleasant Hill, MO 64080)	DIVISION
DOB: 02/21/1991)	
Race/Sex: B/M)	
)	
	DEFENDANT.)

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the **class A felony of murder in the first degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about November 18, 2018, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Sarah E. Simms by shooting her.

The range of punishment for a Murder in the First degree is death or imprisonment in the custody of the Missouri Department of Corrections for life without eligibility of probation or parole, or release except by act of the governor. A person found guilty of murder in the first degree who was under the age of eighteen at the time of the commission of the offense shall be sentenced to a term of life without eligibility for probation or parole as provided in section 565.034, life imprisonment with eligibility for parole, or not less than thirty years and not to exceed forty years imprisonment.

Count II. Armed Criminal Action (571.015-001Y19755213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about November 18, 2018, in the County of Jackson, State

State vs. Michael T. Dumas

of Missouri, the defendant committed the felony of murder in the first degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the first degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count III. Assault 1st Degree Or Attempt (565.050-002Y19791304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about November 18, 2018, in the County of Jackson, State of Missouri, the defendant shot at the victim and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

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 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 IV. Armed Criminal Action (571.015-001Y19755213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about November 18, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in

State vs. Michael T. Dumas

Count three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

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/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
321 West Lexington Avenue
Independence, MO 64050
(816) 881-4592
jbaldwin@jacksongov.org

WITNESSES:

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
2. PO Brian Hanrahan, 223 N. Memorial Drive, Independence, MO 64050
3. DET Kyle Jarnagin, 223 N. Memorial Drive, Independence, MO 64050

State vs. Michael T. Dumas

4. [REDACTED]
5. DET Scott Mckee, 223 N. Memorial Drive, Independence, MO 64050
6. DET Steven Schmidli, 223 N. Memorial Drive, Independence, MO 64050
7. [REDACTED]

PROBABLE CAUSE STATEMENT

Date: 11/18/2018

Report #: 2018-85127

I, Scott McKee, 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 11/18/2018, at 0530 Hours, Michael T. Dumas, (Race- Black, Sex- Male, DOB- 02/21/1991, Address-30201 E. State Route VV, Pleasant Hill, MO 64080, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 11/18/2018 at about 0534 hours Independence Missouri Police Officers were dispatched to 3827 S. Sterling, Independence, MO 64052 in regards to a shooting. The reporting party who called 911 advised that two people had been shot by a guy named "Michael" who had already fled the scene.

The first Officers on scene were B. Hanrahan and J. Holt and when they entered the residence they encountered two victims who were later identified as Sarah E. Simms and [REDACTED]. The victim [REDACTED] was conscious and sitting on a couch in the living room. He advised he had been shot under the right arm. When Officer Hanrahan located victim Sarah Simms she was lying on the kitchen floor with a severe wound to her head. She was not conscious, but still breathing. The victim Simms was transported to Centerpoint Hospital where she later succumbed from her injuries.

Detective S. Schmidli interviewed witness [REDACTED]. [REDACTED] advised he lived with his girlfriend [REDACTED] who owned the residence, 3827 S. Sterling. For the last couple of months Amy had been renting a room to victim Sarah Simms. [REDACTED] stated the suspect Michael Dumas has been at the residence with Sarah before and just as recent as last night. Mr. [REDACTED] said he knew that the suspect Michael Dumas was a suspect in a Murder investigation from 2017, IPD case #2017-70822, and out on bond. Also, it should be known that the victim Sarah Simms is a cooperating key witness in that case.

[REDACTED] said this morning at about 0230 hours he was awake doing some things and around that time he had overheard Sarah Simms arguing with a male who he assumed was Michael Dumas in her bedroom. At about 0530 hours this morning [REDACTED] said he had came upstairs from the basement and entered the kitchen when he observed Michael Dumas walking towards the back door to leave. [REDACTED] saw Dumas holding something in his hand so he said "hey" and Dumas turned around holding a large butane torch. [REDACTED] said Dumas then held up a shotgun (silver barrel, camo pump, cut off stock wrapped in black electrical tape) and was pointing it at [REDACTED] and Sarah Simms who were also in the kitchen. [REDACTED] heard Dumas say, "Don't pull it, don't pull it" to [REDACTED]. [REDACTED] said he looked a [REDACTED] and saw that both he and Sarah Simms had their hands up and were not holding any weapons. [REDACTED] said that Dumas then pointed the shotgun at Sarah Simms and shot her. He said that Dumas then immediately ran out the door. Detective Schmidli presented [REDACTED] a photo lineup which included suspect Michael Dumas and positively identified Dumas.

The victim [REDACTED] refused medical treatment and was transported to HQ to give a formal statement. Detective K. Jarnagin interviewed [REDACTED] who stated that he knew the suspect that shot him was a black male and believed his last name was "Dumas". [REDACTED] said that the suspect "Dumas" was at the residence yesterday and drove a black car with custom wheels. [REDACTED] refused to look at a photo lineup to positively identify the suspect because he did not want to be classified as a "Snitch" if he went back to prison.

After a search of the residence it was learned that the suspect's vehicle (a 2012 black Hyundai Sonata) was still parked unoccupied behind the residence. From outside the vehicle a shotgun shell box and shells were observed

lying on the rear passenger floor board. In the kitchen of the residence lying on the floor was a spent shotgun shell similar to the shells observed in the suspect vehicle.

Detective Scott McKee 1026

/s/ Detective Scott McKee 1026

Print Name

Signature