

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

POLICE NO. :	16-020323
PROSECUTOR NO. :	095439950
OCN :	W0010348

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ANTOINE L. ELLIS)	
420 Potter Ave.)	CASE NO. 1716-CR02591-01
Kansas City, MO - 64120)	
DOB: 07/28/1986)	
Race/Sex: B/M)	
██████████)	
)	DEFENDANT.

INDICTMENT

In the Circuit Court of Jackson County, Missouri, at Kansas City, September Term, 2019. In Division Number 10 thereof, designated by the rules of said Court as Criminal Division A.

Count I. Statutory Rape 1st Degree - Sexual Intercourse with a Person Less than 14 Years Old (566.032-001Y19951116.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of Section 566.032, RSMo, committed the **Felony of Statutory Rape in the First Degree**, punishable upon conviction under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or about or between June 14, 2014 and January 31, 2016, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with ██████, a child less than fourteen years old.

Statutory rape in the first degree or an attempt to commit statutory rape in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years, unless in the course thereof the actor inflicts serious physical injury on any person, displays a deadly weapon or dangerous instrument in a threatening manner, subjects the victim to sexual intercourse or deviate sexual intercourse with more than one person, or the victim is less than twelve years of age in which case the authorized term of imprisonment is life imprisonment or a term of years not less than ten years.

Count II. Statutory Rape 1st Degree - Sexual Intercourse with a Person Less than 14 Years Old (566.032-001Y19951116.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of Section 566.032, RSMo, committed the **Felony of Statutory Rape in the First Degree**, punishable upon conviction under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or about or between January 1, 2016 and January 31, 2016, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with ■■■, a child less than fourteen years old.

Statutory rape in the first degree or an attempt to commit statutory rape in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years, unless in the course thereof the actor inflicts serious physical injury on any person, displays a deadly weapon or dangerous instrument in a threatening manner, subjects the victim to sexual intercourse or deviate sexual intercourse with more than one person, or the victim is less than twelve years of age in which case the authorized term of imprisonment is life imprisonment or a term of years not less than ten years.

Count III. Enticement of a Child (actor is 21 Years of Age or Older and Child is Less than 15 Years of Age) (566.151-001Y20066410.0)

The Grand Jurors of the County of Jackson, State of Missouri, charge that the defendant, in violation of Section 566.151, RSMo, committed the **Felony of Enticement of a Child**, punishable upon conviction under Section 566.151, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about or between January 1, 2016 and March 23, 2016, in the County of Jackson, State of Missouri, the defendant, who was twenty-one years of age or older, enticed ■■■, who was less than fourteen years of age, by sending sexually explicit text messages to ■■■ and the defendant did so for the purpose of engaging in sexual conduct with a person less than fourteen years of age and defendant has previously pleaded guilty to or been found guilty of an offense contained in Chapter 566, RSMo, in that on or about September 10, 2007, defendant pled guilty to the crime of Statutory Rape-1st Degree-Sexual Intercourse with a Person Less than 14 Yrs Old { *Felony Unclassified RSMo: 566.032* } in the St. Charles, Missouri Circuit Court.

The range of punishment for the unclassified felony of enticement of a child is a term of imprisonment not less than five years and not more than thirty years.

Wherefore this Indictment supersedes any Complaint, Information, or Indictment previously filed in the Associate Circuit Court.

TRUE BILL

FOREPERSON

**JEAN PETERS BAKER
PROSECUTING ATTORNEY
FOR THE COUNTY OF JACKSON,
STATE OF MISSOURI, by**

Received this ____ day of _____, 2019.

WARRANT TO ISSUE. BAIL SET AT \$ _____.

SUMMONS TO ISSUE. BOND TO REMAIN AS PREVIOUSLY SET. SPECIAL CONDITIONS SHALL REMAIN IN EFFECT.

CIRCUIT COURT JUDGE

WITNESSES:

1. PO William D. Campbell, 1125 Locust, Kansas City, MO 64106

2. [REDACTED]

[REDACTED]

[REDACTED]

5. DET Timothy M. Perry, 1125 Locust, Kansas City, MO 64106

6. DET Roger B. Stickler, 1125 Locust, Kansas City, MO 64106

7. [REDACTED]

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 06-15-2017

CRN: 16-20323

I, Detective Roger Stickler - 4973, Kansas City, Missouri Police Department
(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 2015 to 2016, at 420 Potter Ave in
(Date) (Address)

Kansas City, Jackson Missouri Antoine L. Ellis
(County) (Name of Offender(s))

B-M, 07-28-1986, 5'-09", 135 lbs, Black Hair, Brown Eyes committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

Enticement of a Child

On March 23, 2016 CH (mother of victim), JG (step-father of victim), and AM (girlfriend of suspect) responded to the South Patrol Division Station to report **Antoine L. Ellis, B-M, 07-28-1986** (29 year old male) had been sending sexual in nature text messages from 420 Potter Ave, Kansas City, Jackson County, Missouri and receiving sexual in nature text messages from [REDACTED] (a 13 year old female) which shows Antoine and [REDACTED] had been in a sexual relationship.

[REDACTED] (a 13 year old female victim) stated in her Forensic Interview: [REDACTED] denied anything she and Antoine texted about had actually happened. [REDACTED] denied there was a time that **Antoine** was at her home without her mom knowing. [REDACTED] denied that there was a time she was alone with **Antoine**. [REDACTED] denied she sent any pictures to **Antoine** or that **Antoine** sent her any pictures of him. [REDACTED] denied anyone has done something to her body that she did not want them to do. [REDACTED] denied anyone has asked or told her to do something to their body.

[REDACTED] (mother of victim) stated the following: **Antoine** was a friend of [REDACTED]. In January of 2016, [REDACTED] was contacted by [REDACTED] (**Antoine's** girlfriend) who advised [REDACTED] she had some questionable text between [REDACTED] and **Antoine**. [REDACTED] advised **Antoine** he needed to leave [REDACTED] alone. In March of 2016, [REDACTED] found text messages between [REDACTED] and **Antoine** that were explicit - sexual activities.

[REDACTED] provided Screen Shots of the sexual in nature text messages that were on [REDACTED]'s tablet that shows [REDACTED] and Antoine had a sexual relationship:

Text dated March 21, 2016:

Antoine: I miss that fat wet pussy
[REDACTED] It's not that fat

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Text dated March 22, 2016:

Antoine: You kno I love you

█: OK

Antoine: I wanna fuck

█ Me too

Antoine: When and with who

█ Soon and with you

Antoine: Really

█ Yesss and my bed is different nowe

Antoine: Should and would we fuck

█ Yes we should and if you came over like you used to we would

Antoine: How would you be fuckin me

█ Shii nice and slow

█ Or fast idk we ain't fucked in a while

Antoine: How would you suck my Dick lol ikr

█ Just like I used to.. Your teasing me

Antoine: I wishi could I want it now what do you want

█ That dick we need to fuck

Antoine: Yes you are right we do but i might not wanna pull out i love the way you suck my Dick

Antoine: Do you miss my tongue ring

█ Yesss I miss everything that's why I wanna see you

Antoine: Why are you crying

█ Because what we were talking about and stuff and then me and my mom I don't wanna be here anymore..

Antoine: What happen with you and your mom

Antoine: Baby girl

█ Because she doesn't trust me.... And about us I feel the exact same way I was naming off different ways we can see each other but I don't even know how they will work. You barely get to leave your house I will sneak you in at anytime just to see you. I miss you I want to be with you. I know I'm 13 but I think that I fell in love with you. I almost got caught talking to you on the phone that's why I hung up.. I'm sorry things have to be this way..

Antoine: Can you call from you tablet you are in love with me just like im in love with you

█ No I can't call from my tablet and yes I'm in love

Antoine: How are you I love tell me

█ Its not that you took my virginity.. Its because you know me you know my functions. Likes and dislikes. You love me for who I am. You don't like no for an answer...

Antoine: The way i feel now i wanna get you pregnant

█ (step-father of victim) stated the following: █ and **Antoine** had been friends back in 2015. Between January and February 2016 █ found out █ and **Antoine** were texting via X-Box and several phone numbers. They had been texting how they had been lying in bed together and the texts were pornographic messages. **Antoine** texted how he missed her sweet pussy and █ would text how she missed his long black dick. They texted how they would kiss and that it was fun.

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█ (girlfriend of **Antoine**) stated the following: █ stated she and **Antoine** had been in a serious relationship as boyfriend and girlfriend for 2 years, they live together, and **Antoine** is on a lifetime House Arrest and wears a GPS ankle bracelet all the time. █ stated she was in the Johnson County Missouri Jail from January 13 to January 30, 2016. █ stated in the original report, that on 03-22-2016 at 0200 hours **Antoine** returned home intoxicated and began texting █ with a large number of sexual in nature messages. █ stated on 03-23-2016 **Antoine's** control box for his GPS Monitor had lost battery power. Probation and Parole called her phone 3 separate times.

Children's Mercy Hospital diagnosed █ to have Bacterial Vaginosis and Screening for child sexual abuse (found on page 29 of 31 of the Outside Summary of Care). No Future Appointments Scheduled (found on page 30 of 31 of the Outside Summary of Care).

Antoine L. Ellis denied he had any type of a sexual relationship with █ Antoine denied communicating with █ by text messaging. Antoine stated someone else had his phone at the time the sexually in nature text communication was taking place between his phone and █'s phone.

Printed Name Det. Stickler - 4973

Signature

Det. Stickler - 4973

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

Judge

Circuit Court of _____ County, State of Missouri.