

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

POLICE NO. :	17-030580
PROSECUTOR NO. :	095439967

STATE OF MISSOURI,

PLAINTIFF,)

VS.

RONALD L. DAVIE

3420 Elmwood Ave.,

Kansas City, MO - 64128

DOB: 07/14/1956

Race/Sex: B/M;

DEFENDANT.)

COMPLAINT

Count I. Sodomy Or Attempted Sodomy - 1st Degree (566.060-001Y20131121.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the felony of sodomy in the first degree, punishable upon conviction under Section 566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about April 26, 2017, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant knowingly had deviate sexual intercourse with [REDACTED], who was incapable of consent because of a mental disease or defect and was known by defendant to be unable to make a reasonable judgment as to the nature or harmfulness of the deviate sexual intercourse by touching [REDACTED]'s anus with defendant's penis. Further, defendant is a persistent sexual offender having been found guilty of Attempted Forcible Sodomy with Weapon or Injury on or about December 20, 1993 in Jackson County Circuit Court.

The offense of sodomy in the first degree wherein the defendant is a persistent sexual offender having previously found guilty of Attempted Forcible Sodomy is a term of imprisonment for life without eligibility for probation or parole. Further, subsection 4 of section 558.019 shall not apply to any person found to be a persistent sexual offender and "imprisonment for life" shall mean imprisonment for the duration of the person's natural life.

State vs. Ronald L. Davie

Count II. Incest (568.020-001Y20173607.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.020, RSMo, committed the class E felony of incest, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 26, 2017, in the County of Jackson, State of Missouri, the defendant engaged in deviate sexual intercourse by touching [REDACTED]'s anus with defendant's penis with [REDACTED], whom the defendant knew to be a descendant by blood.

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 two (2) years 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 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/ Audrey McCormick

Audrey McCormick (#63071)
Assistant Prosecuting Attorney
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WITNESSES:

S.D., Jackson County Prosecutor's Office
PO Ann Malnar, 1125 Locust, Kansas City, MO - 64106
DET Erica Oldham, 1125 Locust, Kansas City, MO - 64106
DET Zachary T. Usher, 1125 Locust, Kansas City, MO - 64106
[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 06/17/2017

CRN: 17-30580

I, Det. E. Oldham 5112
(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 04/26/2017, at 805 West 101st Terr. in
(Date) (Address)

Kansas City, Jackson County Missouri Ronald L. Davie
(County) (Name of Offender(s))

B/M 07/14/1956, 5'08", 260 lbs., Black hair, Brown eyes committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

Sodomy

On 04/28/2017 at 1831 hours, officers of the Kansas City, Missouri Police Department were dispatched to **805 West 101st Terrace, Kansas City, Jackson County, Missouri** in regard to a sodomy. Upon arrival, officers contacted Witness 1, the mother of the victim, who stated her son, the victim, told her he was sodomized by his father, **Ronald L. Davie B/M 07/14/1956**. It should be noted the victim is mentally disabled. The victim also has several health problems including diabetes, cerebral palsy and scoliosis.

Witness 1 stated on 04/26/2017 she came home from work and found the victim with his pants down around his ankles sitting on the couch. Witness 1 then walked into her room and heard the pantry door in the kitchen close. Witness 1 then heard the front door to the residence open and close so she started yelling for the victim to find out who was in the house. The victim then told her, "That was my daddy." When Witness 1 asked the victim what **Davie** was doing at the house? The victim told her "he put his penis in my buttocks." On 04/26/2017, Witness 1 transported the victim to St. Joseph's Medical Center for a sexual assault exam.

On 05/30/2017 the victim was interviewed by the Child Protection Center. During the interview the victim revealed **Davie** put his penis inside his rectum and **Davie** ejaculated.

On 06/16/2017 officers of the Kansas City, Missouri Police Department conducted a residence check at 3420 Elmwood Ave., Kansas City, Jackson County, Missouri and **Davie** was arrested on an investigative hold for questioning. **Davie** provided a statement and denied ever sodomizing the victim and initially denied having seen the victim for several years. **Davie** then said he had visited the victim at the victim's residence sometime within the past year but was vague on the timeframe. Details of the visit coincided with the account the victim and witness 1 gave on the day of the offense. **Davie** admitted to driving a gray van to the victim's house when he visited and witness 1 reported seeing a gray van at the scene when she arrived home at the time of the offense. **Davie** agreed to provide a buccal swab for his DNA.

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CRN 17-30580

Laboratory analysis is pending.

Printed Name Det. E. Oldham 5112 Signature *Det. E. Oldham 5112*

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

Judge

Circuit Court of _____ County, State of Missouri.