

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

POLICE NO. :	18-019354
PROSECUTOR NO. :	095452605
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
STEPHAINE L. NANCE)	
2001 Overhill St.)	CASE NO. 1916-CR
Oak Grove, MO 64075)	DIVISION
DOB: 03/24/1978)	
Race/Sex: W/F)	
[REDACTED])	
)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 March 13, 2018, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others knowingly or with the purpose of causing serious physical injury to Michael Fisher caused the death of Michael Fisher by shooting him.

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. 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 March 13, 2018, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Murder in the Second Degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing

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felony of Murder in the Second 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.

Count III. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y19501006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the **Class B Felony of Kidnapping in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 13, 2018, in the County of Jackson, State of Missouri, defendant either acting alone or purposefully in concert with others unlawfully removed Ashli Fisher from 1806 Cleveland, Kansas City, Jackson County, Missouri, the place where Ashli Fisher was found by defendant, without Ashli Fisher consent because of forcible compulsion, for the purpose of facilitating flight after the commission of the felony of the murder of Michael Fisher at 1806 Cleveland.

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 March 13, 2018, in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with others committed the felony of Kidnapping in the First Degree charged in Count Three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Kidnapping 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 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.

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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/ Jordan R. Bergus
Jordan R. Bergus (#64729)
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WITNESSES:

1. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
2. [REDACTED] 12th St, Floor 11, Kansas City, MO 64106
3. DET Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127
4. Michelle L. Dunkin, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. [REDACTED]
6. Michael Fisher, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
7. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
8. PO Joshua M. Sandifer, 1125 Locust, Kansas City, MO 64106
9. DET Mark A. Slater, 1125 Locust, Kansas City, MO 64106
10. DET Jason M. Smail, 1125 Locust, Kansas City, MO 64106
11. DET Christopher S. Smith,
12. [REDACTED]
13. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 05/07/2019

CRN: 18-19354

I, Det. Darin Penrod #4288
(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 03-13-2018, at 1806 Cleveland Ave in
(Date) (Address)

Kansas City, Jackson Cunty Missouri Stephanie L. Nance
(County) (Name of Offender(s))

WF, 03/24/1978, 5'06", 150 LBS., BRO, BRO committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 03-13-2018 at approximately 1900 Hours, KCPD Undercover Officers, a KCPD Tactical Response Team, and patrol Officers responded to **1806 Cleveland Ave Kansas City, Jackson County, MO 64127** in regard to a dead body reported inside the residence by a source known to the undercover unit. On 3/13/18 at approximately 1738 hours, a member of the Kansas City Missouri Police Department received a phone call from a source in regard to the source having received information on 3/13/18 in regard to a deceased male being inside 1806 Cleveland Ave. The source stated the deceased male had been believed to have stolen property from the parties who reside and/or associate with 1806 Cleveland Ave. The source stated the homeowner, later identified as Michelle Dunkin advised the male apparently suffocated from being duct taped, and said his death was an accident. The source was asked for assistance in disposing of the body by Dunkin. The source spoke to Dunkin by telephone and the phone number associated with Dunkin was confirmed to be a cellular phone. The source was asked to contact Dunkin by phone to verify the information and KCPD detective (JS) listened to the conversation as Dunkin explained the same information in regard to there being a deceased male in the residence and needing assistance to dispose of the corpse.

On 3/13/18 at approximately 1900 hours, members of a KCPD Tactical Reponse Team responded to the residence and knocked on the front door. A black male answered the door and TRT members ordered the male out of the residence at gunpoint. Dunkin was also inside and was ordered out. Both parties were detained. As the Tactical Response Team was clearing the residence, a captain on scene asked Dunkin, if there was anyone inside who could pose a threat to them. Dunkin advised the location of her dog inside the residence, and said there was a "deceased male" inside. When tactical officers cleared the residence a deceased male was observed in the basement near a bed.

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A search warrant was obtained for 1806 Cleveland. Two spent .22 caliber shell casings were recovered from the residence; one from a table in the dining room and, the other from the top of the stairs leading to the basement where the victim was discovered. The victim, a 49 year old male, had wounds consistent with being shot and stabbed. Apparent blood smears were observed on a wall near the victim and on the railing of the basement stairs. His death was later ruled a homicide by the Jackson County Medical Examiner's Office.

On 03-13-2018 at approximately 2315 hours, detectives interviewed Michelle Dunkin at Police Headquarters after she was advised of her rights per Miranda. Dunkin stated that on the afternoon of 03/12/2018 she along with several other parties who were identified as a witness and 2 additional suspects became involved in a verbal altercation in the living room of 1806 Cleveland Ave. about the victim blaming others for theft of personal property. Dunkin stated that during the course of the argument the victim yelled obscenities at the second female suspect who Dunkin identified as **Stephanie Nance, WF, 03/24/78**. Nance then fired 2-4 rounds from a .22 caliber revolver at the victim. Dunkin stated that after Nance fired the handgun at the victim, the male suspect who was also standing in the living room stabbed the victim several times. Dunkin stated that while the male suspect was stabbing the victim she retrieved the handgun from Nance. Dunkin stated that the victim was yelling that he was going to get his possessions and leave the residence to which Dunkin responded, "You ain't going nowhere!" and fired the .22 caliber revolver 2-4 times at the victim as he was backing into the kitchen. Dunkin stated that the male suspect followed the victim into the kitchen where the stairs to the basement were located. Dunkin stated that she heard the victim fall down the stairs and then the male suspect come back into the living room and tell them the victim was dead. Dunkin described the handgun as an "old west" style handgun that she referred to as "John Wayne." Dunkin was not able to clearly describe the knife used by the male suspect but, stated the weapon used was clearly a knife. Dunkin stated that she left the residence after the homicide. Dunkin stated on 03/13/2018 prior to being taken in to custody she was involved in a conversation with Nance about disposing of the victim's body by dismembering him for ease of disposal. Dunkin was subsequently charged and convicted of this offense.

On 03/21/2018, Stephanie Nance was arrested pursuant to a stop order issued in regard to this investigation. She was questioned at East Patrol Division after being advised of her rights per Miranda. She denied any knowledge or involvement in this offense other than to say the victim's wife had told her he was found deceased in Michelle Dunkin's residence. When asked to account for her whereabouts around the time of this offense, Nance stated she and her husband had been staying at local motels on 40 Highway and specifically named the Sky Vu and another motel located near Dixon's Chili and a liquor store. Nance was not charged while she was in custody.

On 04/25/2018, the victim's wife, [REDACTED], was interviewed at the Johnson County (KS) Jail. She admitted to being present during this offense. She stated she and the victim had been living at Michelle Dunkin's residence. [REDACTED] described a situation prior to this homicide where she had been accused of stealing some items and advised she had been kicked out. [REDACTED] stated she was back at the residence and was in the front room along with Michelle Dunkin, Stephanie Nance and a male friend of Nance's. The victim had come upstairs to brush his teeth and the male friend of Nance's began yelling at the victim for not standing up for her. [REDACTED] stated Dunkin then approached the VIC and stabbed him in the side. [REDACTED] advised the victim began to call Nance's children the "N" word. [REDACTED] observed Dunkin hand two guns to Nance and her male friend. She described the gun Nance had as Dunkin's "John Wayne" gun. [REDACTED] claimed at some point she was forced into the bathroom and while in there she heard a gunshot and her husband yell "Ow". Though she did not see the shot, she heard Nance say the gun she had was heavy and she (Nance) had just shot the victim in the leg. [REDACTED] stated she heard the victim tell Dunkin to stop stabbing him. [REDACTED] stated she also heard the victim and Nance's male friend arguing and then the

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sound of something glass being thrown. During court testimony, [redacted] described being held against her will after the homicide by Stephanie Nance at a local motel that is consistent with Nance's description/location of the motel she (Nance) and her husband were staying at around the time of this homicide.

During the course of this investigation detectives received information the male friend of Nance's was named [redacted]. A [redacted], WM, 10/25/78 was located in police databases. On 04/01/2109, detectives showed [redacted] a lineup consisting of six single photos of white males all similar in appearance with a photo of [redacted] among these photos. [redacted] positively identified the photo of [redacted] and when asked what his involvement was she stated he beat the "crap" out of the victim and thinks he also stabbed him.

On 05/05/2019, [redacted] provided a formal statement to detectives at Police Headquarters after being advised of his rights per Miranda. [redacted] initially denied any involvement in this offense. He ultimately admitted he was present when the victim was killed. He stated Michelle Dunkin and Stephanie Nance had taken turns shooting the victim with Dunkin's "John Wayne" gun. [redacted] also stated they (Dunkin and Nance) had both stabbed the victim with a kitchen knife and then pushed him down the basement stairs. [redacted] admitted he threw a clay pot at the victim when he would not go downstairs but denied he himself had shot or stabbed him.

Printed Name Det. Darin Penrod #4288 Signature [Handwritten Signature]

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

Judge

Circuit Court of _____ County, State of Missouri.