

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**  
**AT INDEPENDENCE**

<b>POLICE NO. :</b>	19-059829
<b>PROSECUTOR NO. :</b>	095454055
<b>OCN:</b>	QO000230

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>TREYVOHN D COVINGTON</b>	)	
<b>17204 E. 52nd Street</b>	)	<b>CASE NO. 1916-CR</b>
<b>Independence, MO 64055</b>	)	<b>DIVISION</b>
<b>DOB: 08/06/1993</b>	)	
<b>Race/Sex: B/M</b>	)	
<b>████████████████████</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 12 Yoa (566.062-003Y20171199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or about August 4, 2019, 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 ██████, who was then a child less than twelve years old, by touching the defendant's penis to ██████'s mouth.

An individual convicted and sentenced for this offense when the victim is a child less than twelve years of age shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment is imprisonment in the custody of the Missouri Department of Corrections for life or a term of years not less than ten (10).

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**Count II. Attempted Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 12 Yoa (566.062-003Y20171199.1)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the unclassified felony of attempted statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or about August 4, 2019, in the County of Jackson, State of Missouri, the defendant touched the defendant's genitals to [REDACTED] face, and such conduct was a substantial step toward the commission of the offense of statutory sodomy in the first degree, and was done for the purpose of committing statutory sodomy in the first degree.

An individual convicted and sentenced for this offense when the victim is a child less than twelve years of age shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment is imprisonment in the custody of the Missouri Department of Corrections for life or a term of years not less than ten (10).

**Count III. Child Molestation - 2nd Degree -child Less Than 12 Yoa (566.068-001Y20173618.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.068, RSMo, committed the class B felony of child molestation in the second degree, punishable upon conviction under Section 558.011, RSMo, and subject to lifetime supervision under Section 217.735 and Section 559.106, RSMo, in that on or about August 4, 2019, in the County of Jackson, State of Missouri, the defendant, for the purpose of arousing or gratifying the sexual desire of the defendant subjected [REDACTED], who was then less than twelve years of age, to sexual contact by touching the defendant's genitals to [REDACTED]'s back.

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.

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**Count IV. Burglary 1st Degree (569.160-001Y20172299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the **class B felony of burglary in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 4, 2019, in the County of Jackson, State of Missouri, the defendant knowingly remained unlawfully in an inhabitable structure, located at 12403 E. 40th Street B, Independence, Missouri, and possessed by [REDACTED], for the purpose of committing statutory sodomy therein, and while in such an inhabitable structure, there was present in such an inhabitable structure [REDACTED] person who was not a participant in the crime.

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.

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/ Kelly Collins  
Kelly Collins (#68006)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
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**State vs. Treyvohn D Covington**

**WITNESSES:**

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
  2. [REDACTED]
  3. [REDACTED]
  4. [REDACTED]
  5. DET Emily Knox, 223 N. Memorial Drive, Independence, MO 64050
  6. PO Raymond Osenbaugh, 223 N. Memorial Drive, Independence, MO 64050
  7. [REDACTED]
  8. [REDACTED]
  9. DET John Roach, 223 N. Memorial Drive, Independence, MO 64050
- [REDACTED]
- [REDACTED]

## AMENDED PROBABLE CAUSE STATEMENT

Date: 8/4/2019

Report #: 2019-59829

I, John Roach, 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 08-04-19 at 12403 E. 40<sup>th</sup> Street South, apartment B, Independence, Jackson County Missouri, 64055, Treyvohn D. Covington, (Race: Black, Sex: Male, DOB: 08-06-1993, Address: 12409 E. 40<sup>th</sup> Street South, apartment F, Independence, Jackson County Missouri 64055, [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 08-04-19 at 0515 hours, Officers with the Independence Police Department were dispatched to 12403 E. 40<sup>th</sup> Street, apartment B, Independence, Jackson County Missouri 64055, on a burglary. Upon Officer's arrival they found Treyvohn **Covington** in the living room of the apartment naked from the waist down. **Covington** was taken into custody and transported to the Independence Detention Unit and placed on a 24 hour hold for burglary and sexual assault.

Officer Osenbaugh made contact with the Reporting Party [REDACTED], 09-15-64). She advised she had driven from Springfield Missouri to Independence with her grandsons: Victim 1 ([REDACTED], 02-06-2010), Victim 2 ([REDACTED], 02-01-2012) and Victim 3 [REDACTED], 10-16-2008) and was staying at the above listed address which belongs to her sister: [REDACTED] (07-11-75). [REDACTED] stated Victims 1, 2 and 3 were sleeping in the living room of the apartment and she was in a back bedroom.

[REDACTED] advised Victim 1, who is diagnosed with autism, came into the bedroom and was "acting excited" but not making any statements. She stated she sent Victim 1 back into the living room and told him to go back to bed. [REDACTED] stated a few minutes later she heard what she thought was Victims 1, 2 and 3 playing in the living room and went out to tell them to be quiet.

[REDACTED] advised when she got into the living room she observed **Covington** on top of Victim 1. She stated **Covington** did not have pants on and she observed Victim 1 on his back. [REDACTED] stated **Covington** was holding down Victim 1 with one hand placed on Victim 1's chest and with the other hand he was holding his own penis and touching his penis to Victim 1's face. She stated she ran into the living room and pushed **Covington** off of Victim 1, and took Victims 1, 2, and 3 to the bathroom and locked them in. [REDACTED] stated the police were then called.

Victim 1 disclosed to [REDACTED] that **Covington** had entered the apartment and taken off his (**Covington's**) pants and underwear. Victim 1 stated **Covington** then put his penis into his (Victim 1's) mouth. Victim 1 advised he tried to close his mouth but before Victim 1 could close his mouth he felt **Covington's** penis touch his tongue. Victim 1 disclosed to [REDACTED] that he was able to get away from **Covington** and that is when he ran into [REDACTED]'s room and tried to tell her what was happening.

Victims 2 and 3 were also in the living room when **Covington** was assaulting Victim 1. Victim 2 disclosed to [REDACTED] that **Covington** had been calling them cowards when **Covington** was rubbing his penis on Victim 2 through the blanket because they (Victims 1, 2, and 3) wouldn't touch his penis. The women ([REDACTED] and [REDACTED]) said Victim 2 had rolled over and the blanket must have moved because **Covington** was able to place his penis on Victim 2's back. Victim 3 told [REDACTED] and [REDACTED] that Victim 3 hadn't seen **Covington's** penis because he hid in the blanket before seeing it.

[REDACTED] responded to the Independence Police Department where she was interviewed by Detective Burris. During the interview [REDACTED] described how Victim 1 had come into the bedroom where she had been sleeping and was "acting excited". She stated she thought he was excited about going home to Springfield that day so she sent him back to the living room and told him to go to sleep.

[REDACTED] stated a few minutes later she heard what she thought was Victims 1, 2, and 3 playing in the living room. She stated when she went to check on them she observed **Covington** on top of Victim 1. [REDACTED] stated the back door to the residence had been left unlocked due to her older grandson being out late with friends. [REDACTED] stated when she originally saw **Covington** she thought he was a friend of her grandson's. [REDACTED] stated when she looked closer she observed that **Covington** was not wearing any pants. She stated she observed **Covington** holding Victim 1 down and that **Covington's** genitals were on Victim 1's face.

[REDACTED] stated she ran into the living room and grabbed Victim 1 and took him to the bathroom away from **Covington**. She stated she ran back into the living room and grabbed Victims 2 and 3, who were hiding under blankets, and took them to the bathroom as well. [REDACTED] stated she then told her sister ([REDACTED]) to call 911.

[REDACTED] stated **Covington** stayed in the living room until police arrived.

On 08-04-19 Victims 1, 2 and 3 were taken to the Child Protection Center where they were forensically interviewed by Randi Spruill.

Victim 1 was interviewed but did not make any disclosures to Spruill.

Victim 2 disclosed he had been woken up by the dog barking and someone knocking on the back door. He stated he went to the door and opened it because he thought it was one of his cousin's friends. Victim 2 stated **Covington** came into the apartment and took his pants and underwear off. Victim 2 stated **Covington** began "acting crazy" and he (Victim 2) hid underneath the blankets on the floor. Victim 2 stated while he was under the blanket he felt something "long and skinny" hitting him on the back through the blanket and thought it was **Covington's** penis.

Victim 2 stated [REDACTED] came and took him into the bathroom away from **Covington**. He stated he heard Victim 1 disclosing to [REDACTED] that **Covington** had put his penis in his (Victim 1's) mouth.

Victim 3 stated when **Covington** came into the apartment he thought **Covington** was one of his cousin's friends. At that point in the interview Victim 3 advised he didn't want to talk about what happened after that because it made him uncomfortable.

On 08-04-19 at 1800 hours **Covington** was escorted from detention to a 3<sup>rd</sup> floor interview room. Prior to the interview **Covington**, was read and signed the Miranda Warning of Rights form. **Covington** advised he lives at 12409 E 43<sup>rd</sup> Street, Independence, Jackson County Missouri, 64055 with his girlfriend. He stated he had been out with his friends drinking last night and blacked out. **Covington** stated the last thing he remembers is taking a shot of Hennessey in a car on the way home from the club. He advised the next thing he remembers is waking up in jail. When he was advised of what had happened he stated he does not have any recollection of what happened.

Detective John Roach

/s/ Detective J. Roach

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Print Name

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Signature