

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

POLICE NO. :	KC20031885
PROSECUTOR NO. :	095459542
OCN:	HS020064

STATE OF MISSOURI,	)	
	)	PLAINTIFF,
vs.	)	
	)	
ILENE M DAVIS	)	
Homeless	)	CASE NO. 2016-CR
Kansas City, MO 64106	)	DIVISION
DOB: 03/14/1972	)	
Race/Sex: W/F	)	
	)	
	)	DEFENDANT.

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y19840904.0)

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 May 16, 2020, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Howard West caused the death of Howard West by stabbing 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 (571.015-001Y19755212.0)

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 May 16, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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 statement(s) of facts filed contemporaneously herewith, 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.

State vs. Ilene M Davis

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Joseph R. Van Amburg

Joseph R. Van Amburg (#64207)
Assistant Prosecuting Attorney
415 E. 12th St.
11th Floor
Kansas City, MO 64106
(816) 881-3825
JRVanAmburg@jacksongov.org

WITNESSES:

1. PO Anderson, 1125 Locust, Kansas City, MO 64106
2. DET Alane M. Booth, 1125 Locust, Kansas City, MO 64106
3. PO Timothy L. Griddine, 1125 Locust, Kansas City, MO 64106
4. DET Ian D. Hobbs, 1200 E. Linwood, Kansas City, MO 64106
5. [REDACTED]
6. [REDACTED]
7. DET Kari E. Mutschler, 1125 Locust, Kansas City, MO 64106
8. DET Christopher S Smith, 1125 Locust, Kansas City, MO 64106
9. PO Judson Trautvetter, 1125 Locust, Kansas City, MO 64106
10. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106
11. Howard West, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/12/20

CRN: 20-31885

I, Detective K. Mutschler #5702, 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 05/16/20, at 1315 Independence Avenue in
(Date) (Address)

Kansas City, Jackson County Missouri Davis, Ilene M.
(County) (Name of Offender(s))

W/F 03/14/72 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 05/16/20 at approximately 0710 hours, officers of the Kansas City Missouri Police Department were dispatched to Independence Avenue and Forest Avenue Kansas City, Jackson County, Missouri on a dead body. Upon arrival, officers discovered a deceased naked black male covered in blood lying on the sidewalk just to the northwest of the intersection. No obvious wounds were observed due to the copias amount of blood. The Jackson County Medical Examiner's Office determined the cause of death to be a stab wound to the head, specifically behind the right ear, and the manner of death to be homicide. The victim was identified as Howard E. West, b/m, 01/28/74 with a documented moniker of "Face." West was determined to be homeless but also associated to that area.

A significant blood trail was observed leading from where the deceased male was located in the street eastbound on Independence Ave towards a parking lot of 1315 Independence Avenue (Somas Kitchen). In the rear west parking lot associated to that business, a recreational vehicle (RV) was located with apparent blood around the entry door of the cabin which faced north towards Independence Ave. A search warrant was obtained and executed on the RV. Investigators observed a significant amount of blood inside the front end of the interior cabin of the RV on the floor, walls, and dresser next to a mattress. A small black handled paring knife was observed on the floor next to the mattress. During the course of the investigation, it was learned that several homeless people would use the RV for shelter but also to exchange sexual favors.

Witness #1 was contacted, who had been in the RV when officers initially arrived in the area, and stated he was asleep inside the RV when he was awakened by "Face" and a white female he named as "Ilene" "tussling" pushing each other back forth. The Witness heard "Face" yell "ow" and immediately ran out of the RV naked. The Witness then observed "Ilene" put on "Face's" pants and leave the RV topless. Prior to her exit, the Witness heard "Ilene" say "I told him he's fucking me too long," and observed her "cupping" an object in her hand that the Witness believed to be a knife. The Witness also observed "Ilene" to have apparent red spots on her body. Approximately ten minutes later, "Ilene" returned to the RV with an unidentified black male looking for clothes.

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Witness #2, who had also been initially contacted within the RV when officers initially arrived, stated she was staying with Witness #1 inside the RV. Witness #2 stated on 05/15/2020 around 2345 hours, she left the trailer to go to a nearby gas station for a drink. When she left and returned approximately 15-20 minutes later, a black male who she knows as "Face" and a white female were in the trailer. Witness #2 stated she went to sleep in the trailer and woke up to the white female yelling "You raped me!" and "You stole from me!" Witness #2 stated she then saw the white female leave the trailer naked with blood on her. After waking up, Witness #2 stated she did not see "Face" and believed he left prior to her waking up.

During the course of the investigation, surveillance video was obtained from several businesses in the area of Independence Avenue which surrounded the area of the parked RV. Surveillance video recovered from a business just west of the location of the RV captured a portion of Independence Avenue and showed a naked black male, believed to be the victim, running naked westbound on Independence Avenue on 05/16/20 at approximately 0538 hours. The naked black male appeared to be grabbing his neck and looking back over his shoulder as he ran westbound down the middle of Independence Avenue.

Additional motion activated surveillance video was obtained from the business directly associated with the parking lot where the RV was parked off of Independence Avenue. However, the video surveillance did not detect and/or activate when the victim apparently ran out of the RV. The video did capture a black male and a white female at the side door of the RV on 5/16/20 at 0558 hours, who appeared to be gathering belongings from the RV. The black male and white female who gathered items from the RV were last seen walking southbound on Virginia from the area of the parking lot associated to the RV. On 5/16/20 at approximately 0702 hours, additional surveillance video captured the same black male and white female walking from the east on Independence Avenue and returning to the RV. They appeared to be the same individuals seen on surveillance video who had gathered belongings from the RV approximately one hour earlier. Both individuals appeared to be wearing the same pants and carrying the same style of bags, but the male and female were now observed wearing different tops, and had apparently switched hats with each other.

Surveillance video related to 5/16/20 at approximately 0707 hours, also captured the same unidentified white female and an unidentified black male hanging around in front of the business directly associated with the parking lot where the RV was parked. The video revealed the female talking to the black male. Based on her mannerisms she appeared to be animated while intently talking to the black male and she was gesturing with her hands as she spoke. The white female gestured a stabbing motion with her right hand clenched towards the black male's neck as she was talking and facing him. The location of the black male's neck (his right side) was the same location as the general area of the wound associated to the deceased victim.

Since the date of the homicide, several TIPS came into the TIPS Hotline which referenced an "Ilene" as the person responsible for stabbing "Face."

On 05/26/20 a bulletin which contained screenshots of the unidentified white female (who had gestured the stabbing motions) was released internally to members of the Kansas City Missouri Police Department in an attempt to identify her.

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On 06/11/20 KCPD officers conducted a pedestrian check on a white female who had similar features to the woman on the bulletin. She identified herself as **Ilene M. Davis, w/f, 03/14/72**, a homeless person who associates to the area where she was contacted by officers. Investigators were notified and responded to the area where officers had contacted DAVIS. DAVIS was asked if she would respond to police headquarters voluntarily to be interviewed about a homicide investigation. DAVIS agreed and was transported in the front seat of an unmarked police vehicle without being restrained and was escorted to an interview room at 1125 Locust St. DAVIS was in possession of a purse during her transport.

Due to DAVIS being similar in appearance to the female who had gestured the stabbing motion, DAVIS was advised of the Miranda Waiver Rights at the onset of the recorded interview. She stated she understood her rights, and agreed to speak to detectives. DAVIS identified a single color photo of the victim, West, and stated she had been dating the victim, who she also knows as "Face," for approximately one month prior to his death. The night before the victim was killed, she confirmed she was with the victim having sex "all night" at various locations before going to the trailer (RV) in the parking lot off of Independence Avenue and Forest Avenue at on 5/16/20 at approximately 0600 hours. DAVIS stated when she and "Face" got to the RV, the victim started smoking meth and they had sex. She stated she stayed with the victim in the RV for approximately two hours and then left to go to the gas station to get beer. She stated when she came back to the RV approximately one hour later, a different black male whom she knew by name told her the victim had been shot and they needed to leave. DAVIS stated she later heard the victim was shot approximately 18 times in the neck, but did not know who did it. DAVIS denied being in the RV at the time the victim was stabbed and stated she did not do it. During the interview, DAVIS was shown screenshots from the aforementioned recovered video associated to the RV and the nearby business. When shown a still photo of the surveillance video of the white female gesturing the stabbing motion, DAVIS stated she did not know the black male with whom she was talking. DAVIS then invoked and the interview was terminated. DAVIS was placed on a 24 hour Investigative HOLD. A search incident to her arrest revealed a small brown handled kitchen knife with a fixed blade within her purse which she had brought with her to Police Headquarters.

Apparent blood was observed on the outside and inside of the handbag near the carrying handles and apparent blood was observed on some contents within the bag.

On 06/12/20 Witness #1 was shown a photo line-up containing DAVIS' booking photo from 06/11/20. Without hesitation Witness #1 positively DAVIS as "Ilene."

Due to the aforementioned facts documented during the course of this investigation and a documented history of assault, DAVIS represents a clear danger to the community. DAVIS is currently homeless and has only been in Kansas City, Missouri for approximately two months. She is from Arizona and therefore is a flight risk.

Printed Name Detective K. Mutschler #5702 Signature /S/ Detective K. Mutschler #5702

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

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Judge

Circuit Court of _____ County, State of Missouri.