

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

POLICE NO. :	2017-1964
PROSECUTOR NO. :	095441261
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JOSEPH F. DAHMAN)	
29210 S. Street, Rt. O)	CASE NO. 2016-CR
Freeman, MO 64746)	DIVISION
DOB: 06/22/1991)	
Race/Sex: W/M)	
<div style="background-color: black; width: 200px; height: 15px;"></div>)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Sexual Contact W/ Student (566.086-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.086, RSMo, committed the class E felony of sexual contact with a student, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or between July 1, 2017 and July 31, 2017, in the County of Cass, State of Missouri, the defendant was an employee of Harrisonville High School and knowingly had sexual contact with [REDACTED], a student of Harrisonville High school, by touching [REDACTED]'s genitals with the defendant's genitals.

The range of 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.

Count II. Sexual Contact W/ Student (566.086-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.086, RSMo,

State vs. Joseph F. Dahman

committed the class E felony of sexual contact with a student, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or between July 1, 2017 and July 31, 2017, in the County of Cass, State of Missouri, the defendant was an employee of Harrisonville High School and knowingly had sexual contact with [REDACTED], a student of Harrisonville High school, by touching [REDACTED]'s mouth with the defendant's genitals.

The range of 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.

Count III. Sexual Contact W/ Student (566.086-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.086, RSMo, committed the class E felony of sexual contact with a student, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or between July 1, 2017 and July 31, 2017, in the County of Cass, State of Missouri, the defendant was an employee of Harrisonville High School and knowingly had sexual contact with [REDACTED], a student of Harrisonville High school, by touching [REDACTED]'s genitals with the defendant's mouth.

The range of 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.

Count IV. Sexual Contact W/ Student (566.086-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.086, RSMo, committed the class E felony of sexual contact with a student, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or between July 1, 2017 and July 31, 2017, in the County of Cass, State of Missouri, the defendant was an employee of Harrisonville High School and knowingly had sexual contact with [REDACTED], a student of Harrisonville High school, by touching [REDACTED] genitals with the defendant's hand.

The range of 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

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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.

Count V. Sexual Contact W/ Student (566.086-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.086, RSMo, committed the class E felony of sexual contact with a student, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or between January 1, 2017 and May 30, 2017, in the County of Cass, State of Missouri, the defendant was an employee of Harrisonville High School and knowingly had sexual contact with ■■■■, a student of Harrisonville High school, by touching ■■■■'s genitals with the defendant's genitals.

The range of 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 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Erin Hunt
Erin Hunt (#59061)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3388
ehunt@jacksongov.org

WITNESSES:

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1. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

64106

8. PO Kaci Calton, 205 N. Lexington Street, Harrisonville, MO 64701

9. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

64106

13. PO Jeremiah Jacobs, 205 N. Lexington Street, Harrisonville, MO 64701

14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

19. DET Charles Sheppard, 205 N. Lexington Street, Harrisonville, MO 64701

20. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

64106

IN THE CIRCUIT COURT OF CASS COUNTY, MISSOURI
SEVENTEENTH JUDICIAL CIRCUIT

STATE OF MISSOURI)
)
 Plaintiff,)
)
 Vs) Case No. 20CA-CR00778
)
) OCN:
 JOSEPH DAHMAN)
)
)
 Defendant.)

PROBABLE CAUSE STATEMENT

STATE OF MISSOURI)
) ss.
 COUNTY OF CASS)

I, Detective Charles Sheppard, 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/about 07/06/2017, at 26105 S. Southwood and 3001 E. Mechanic, Harrisonville, Cass County, Missouri, Joseph Franklin Dahman, W/M, 6'2", 245, Red Hair/Blue Eyes D.O.B. 06/22/1991, [REDACTED] committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 08/25/2017, Officer Jacobs, acting as the Harrisonville High School Resource Officer, was contacted regarding allegations of inappropriate contact between student [REDACTED] (W/F, DOB [REDACTED] 2002) and Joseph Dahman, a High School teacher. School records later indicated that Joseph Dahman was hired as a High School ISS/Focus Facilitator for the 2015-2016 and 2016-2017 school years. Joseph continued as a "Strength and Conditioning" coach effective 05/25/2017 through 07/31/2017 and returned as the ISS/Focus Facilitator for the 2017-2018 school year.

During that initial investigation, Joseph Dahman was interviewed by SRO Jacobs and me and admitted to receiving "inappropriate pictures" from [REDACTED] but denied sending anything. Joseph Dahman first denied having any contact with [REDACTED] outside of school but later admitted to going by her house no more than twice to say, "what's up." Joseph Dahman later admitted to giving her a ride home from the Middle School as well.

On 08/30/2017, [REDACTED] (W/F, DOB [REDACTED] /2000) contacted the Harrisonville High School Counselor stating that she had heard rumors about Joseph Dahman and a student and thought they were about her. During that initial contact (and subsequently later to family members) [REDACTED] stated

she had sex with Joseph Dahman this past summer while in-between school years. [REDACTED] was sent for a forensic interview with Children's Center on 08/31/2017. During that interview [REDACTED] stated she was with friends and that she messaged Joseph Dahman ("the teacher") about "hanging out." Joseph Dahman told her that his fiancé was home, and he would message her when she left so that [REDACTED] could come over.

[REDACTED] stated Joseph Dahman's parents' house was on Southwood, off 2 Hwy. [REDACTED] entered the residence through the window. During her interview [REDACTED] drew a diagram of the bedroom. Once inside the room, Joseph Dahman gave [REDACTED] "Molly" and she knew the pills were "Molly" because he told her that was what he would give her during a text message exchange earlier. [REDACTED] was given 3 pills and Joseph Dahman took approximately 10 pills himself.

After approximately 10 minutes [REDACTED] stated she began to feel different and that Joseph Dahman began to sexually touch her by inserting his finger into her vagina. Joseph Dahman then "ate her out" by placing his mouth and tongue on her vagina. After a short period of time they put their clothes back on and went into the woods to "smoke weed." After they did that, they returned to the residence where they had sex on the couch in the room, as well as on the bed. [REDACTED] went on to state that Joseph Dahman placed his penis in her mouth "several times" during that evening. [REDACTED] stated this incident happened on 07/06/2017, from approximately 0100 hours until 0500 hours when she left.

[REDACTED] stated that was not the first incident with Joseph Dahman and that the first was at Twin Pines County Club which was his idea. [REDACTED] stated she both received and gave oral sex to Joseph Dahman during that incident. [REDACTED] stated there were two other incidents but she did not recall specifics such as date or time. She did say they engaged in oral sex both times.

On 08/31/2017, Harrisonville detectives, along with the Cass County Sheriff's office, executed a search warrant at Frank Dahman's residence (26105 S. Southwood). Prior to that search, I was provided with a copy of [REDACTED] drawing and during the execution of the warrant I observed that a room in the back of the residence was consistent with the drawing done by [REDACTED]. The major difference noted was that there was no bed in the room, and in that location was a "buffet" which Frank told Lt. Osterberg had just been moved into the room shortly before that date.

On 11/16/2017, the Harrisonville Police Department received electronic data from the Heart of America Regional Computer Forensic Laboratory (RCFL). That report was based off the examinations done by their experts of Joseph Dahman's phone, as well as the phones of [REDACTED] and [REDACTED] and Joseph Dahman's school issued computer. The examiner wrote in their report that they observed text messages on Joseph Dahman's phone referencing drugs, as well as a picture that appears on both his phone and [REDACTED]'s phone of possible "joints" and lines of white powder with an AAA card with the name Joseph Dahman on it. [REDACTED] phone had a message containing a text message from Joseph on 06/10/2017 stating "where you wanna meet" sent at 9:55pm. [REDACTED]'s phone showed a contact for Joseph Dahman and call logs showing calls between March and July 2017 to/from that contact.

On 03/05/2018, I was contacted by [REDACTED] ([REDACTED] father) who stated while cleaning [REDACTED] vehicle the past weekend they were discussing the case and possible evidence and he asked [REDACTED] if she had any possible clothing or other items with Joseph's DNA on it. [REDACTED] "immediately" went to

the trunk and removed clothing, a pillow and blanket. I responded to Gardner, KS, and contacted [REDACTED] where he provided me with a bag with the above items. Upon my return to the Police Department a Missouri State Highway Patrol lab request was completed for those items.

During the packaging and processing of the above items I observed stains on the blue blanket that were white/off-white in color [REDACTED] later provided a written statement detailing that she had engaged in oral sex with Joseph Dahman at the Twin Pines Golf Course, but an exact date was not given. She reported that "when he came, I wiped it all on one of the blankets."

On 05/07/2020, upon my arrival at work, I was presented with lab results from the Missouri State Highway Patrol analysis of one of the blankets obtained from [REDACTED] on 03/05/2018. Based on the lab results for "blanket stain 6 nonsperm fraction" (per the MSHP lab report) the observed mixture is approximately 210.3 trillion times more likely to occur under the scenario that it originated from a mixture of DNA from [REDACTED] and Joseph Dahman than from [REDACTED] and another, unknown male. The sperm fraction of the same stain is consistent with Joseph Dahman at an approximate frequency of 1 in 1.60 sextillion

Charles Sheppard

Print name

C. Sheppard #256

Signature

06/22/2020

Date