IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

LICE NO.:	21-0000	940
TOR NO.:	0954624	179
OCN:	HU0026	599
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PLAIN	NTIFF,)
)
)
)
) CASE NO. 2116-CR
) DIVISION
)
)
)
DEFENI	DANT.)
	TOR NO. : OCN: PLAIN	TOR NO.: 0954624

COMPLAINT WARRANT REQUESTED

Count I. Sodomy Or Attempted Sodomy - 1st Degree (566.060-001Y20201115.0)

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 January 4, 2021, 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 Confidential Victim by the use of forcible compulsion.

The offense of sodomy in the first degree or an attempt to commit sodomy in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years. No person found guilty of sodomy in the first degree or an attempt to commit sodomy in the first degree shall be granted a suspended imposition of sentence or suspended execution of sentence. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count II. Sodomy Or Attempted Sodomy - 1st Degree (566.060-001Y20201115.0)

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 **offense of attempted sodomy in the first degree**, punishable upon

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conviction under Section 566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about January 4, 2021, in the County of Jackson, State of Missouri, the defendant knowingly touched his penis to Confidential Victim's mouth, and such conduct was a substantial step toward the commission of the offense of sodomy in the first degree with Confidential Victim, and was done for the purpose of committing such sodomy.

The offense of sodomy in the first degree or an attempt to commit sodomy in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years. No person found guilty of sodomy in the first degree or an attempt to commit sodomy in the first degree shall be granted a suspended imposition of sentence or suspended execution of sentence. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count III. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y20201004.0)

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 January 4, 2021, in the County of Jackson, State of Missouri, defendant unlawfully confined Confidential Victim for a substantial period, without Confidential Victim's consent by the use of forcible compulsion for the purpose of facilitating the commission of the felony of sodomizing Confidential Victim.

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. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count IV. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a concealable firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about January 4, 2021, in the County of Jackson, State of Missouri, the defendant knowingly possessed a rifle, a firearm, and on June 6, 2016, the defendant was convicted of the felony of Possession of a Controlled Substance in the Buchanan County Circuit Court and on February 27, 2015, the defendant was convicted of the felony of Possession of a Controlled Substance in the Jackson County Circuit Court.

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The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) 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/ Audrey McCormick
Audrey McCormick (#63071)
Assistant Prosecuting Attorney
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WITNESSES:

- 1. DET Beau D. Bailey, 1200 Main Street, Grandview, MO 64030
- 2. DET Stephanie Jones, 1200 Main Street, Grandview, MO 64030
- 3. DET Megan Larkey, 1200 Main Street, Grandview, MO 64030
- 4. PO John Newsham, 1200 Main Street, Grandview, MO 64030
- 5. PO Michael Russell, 1200 Main Street, Grandview, MO 64030



GRANDVIEW STATEMENT OF PROBABLE CAUSE Report Number: 21000040

I, Detective Stefany Jones, 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 01-04-2021 at 13606 Cypress Ave, Grandview, Jackson County, Missouri, Everhart, Clinton w/m 02-24-1974 committed one or more criminal offenses.

On 01-04-2021 at approximately 0903 hours Grandview Officers were dispatched to 13606 Cypress in regard to a party who was being held against her will, witnessed a possible homicide and had been raped repeatedly.	
Upon arrival officers were contacted via the reporting party, identified as who came out of the residence with a gun. was transported to the police station for an interview and to be seen by medics. stated that she witnessed Clinton Everhart commit a shooting of inside a vehicle they were all in. She described the vehicle as a purple in color four door car. She described the shooting occurred in Kansas City and the victim's body was pushed out. said after the shooting, Clinton Everhart and another male suspect and were all still in the vehicle and she was thrown on the floorboard and tied up with zip ties said she was taken somewhere in Independence and Clinton dropped off the second male party. said that it was just her and Clinton in the vehicle while leaving Independence.	
said that they drove to Grandview during which time Clinton cut the bindings off. Clinton, who had the gun he shot with and another camo color gun as they were going inside the residence located at 13606 Cypress and inside the residence, they went to a "mixed" male's room whom Clinton kept calling Clinton then got drugs in a syringe and injected made sexually assaulted her. Said there were three other male parties in the residence and	
told police Clinton fell asleep at which time she was able to hide a silver or black in color handgun, a camo in color handgun and Clinton's cell phone inside the residence. also was able to facebook message mother took one weapon with her as she left the residence and contact Officers, she advised it was the shooting weapon. stated that Clinton also has an AR rifle with a silencer, scope and heat sensor inside the residence.	
described the vehicle that the shooting occurred as a purple/ marroon in color four door car, she said it is the vehicle that is still in the driveway. Officers were able to observe a vehicle that matched that description in the driveway with MO license RC5 P6W.	
had clear red marks on her wrists consitent with being bound. described that she had been bound with at different times with zip ties, rope and tape.	
said that she was sexually assaulted by Clinton in his bedroom. She described the bedroom was inside the residence to the rigth, then left, she was unable to giv a clear discription of the room due to her being upset and hysterical. She was able to advise the assault happened on the bed. her vagina and sodomized her and inserted his penis in her anus.	
later said that her clothing, a gray echo sweat shirt, gray pants, white t shirt and pink bra were still in Clinton's bedroom when she fled along with her cell phone, a motorella phone with blue back.	
It should be noted Kansas City Detective Martin responded and assisted with the interview of Detective Martin confirmed that they had a shooting victim identified as provided, such as area on body victim was shot at, the location of the shooting and the victim's idenity were all confirmed as accurate.	
Grandview officers maintained a perimeter on the residece.	

(ATTACH ADDITIONAL SHEET(S) IF NEEDED)

At approximately 1120 hours Officers advised they had three parties exit the residence, two males and one female. The female advised another male party was still in the residence, but she didn't know his name. Detectives interviewed all three parties where it was confirmed by one of the males that Clinton was still inside of the residence and was acting crazy. Negotiations were attempted for several hours in attempt to contact Clinton however he failed to respond. Upon receiving a search warrant for the residence, SWAT located Clinton hiding in a crawl space of the residence under the main level with a black in color rifle lying next to him. Clinton complied with commands and

was taken into custody. Clinton was transported to Research Hospital due to appearing under the influence of drugs and KCPD Detectives advised they would take custody of him from there.

Upon executing the search warrant of the residence, 13606 Cypress Ave, Detectives located multiple pieces of drugs and drug paraphernalia, firearms, zip ties and pieces of rope.

A criminal history check of Clinton showed him to be a convicted felon. Clinton had an extensive criminal history sheet including the following: 2016 found guilty by Buchanan Co. Circuit Court for possession of controlled susbstance; 2019 found guilty for tampering with motor vehicle 1st degree by Jackson Co Circuit Court.

SHI 208
DETECTIVE

THE COURT FINDS PROBABLE CAUSE.

JUDGE

DATE