

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

POLICE NO. :	2021-25235
PROSECUTOR NO. :	095464243
OCN:	QO005603

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MICHAEL D. MYERS)	
569 Crabapple Ln)	CASE NO. 2116-CR
Liberty, MO 64068)	DIVISION
DOB: 01/04/2002)	
Race/Sex: W/M)	
████████████████████)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Statutory Rape Or Attempted Statutory Rape - 1st Degree - Person Less Than 14 Yoa (566.032-001Y20201198.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the **felony of statutory rape in the first degree**, punishable upon convictions under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735, and 559.016, RSMo, that on or about April 26, 2021, in the County of Jackson, State of Missouri, the defendant had sexual intercourse in the bedroom with █████. (D.O.B. 10/14/2007), a child less than fourteen years old.

Count II. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 14 Yoa (566.062-001Y20201199.0)

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 April 26, 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 in the bedroom with █████. (D.O.B.

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10/14/2007), who was then a child less than fourteen years old, by placing [REDACTED] mouth on defendant's penis.

Count III. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 14 Yoa (566.062-001Y20201199.0)

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 April 26, 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 in the bedroom with [REDACTED] (D.O.B. 10/14/2007), who was then a child less than fourteen years old, by placing [REDACTED]'s mouth on defendant's penis.

Count IV. Statutory Rape Or Attempted Statutory Rape - 1st Degree - Person Less Than 14 Yoa (566.032-001Y20201198.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the **felony of statutory rape in the first degree**, punishable upon convictions under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735, and 559.016, RSMo, that on or about April 26, 2021, in the County of Jackson, State of Missouri, the defendant had sexual intercourse in the bedroom with [REDACTED]. (D.O.B. 10/14/2007), a child less than fourteen years old.

Count V. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 14 Yoa (566.062-001Y20201199.0)

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 April 26, 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 in the shower with [REDACTED]. (D.O.B. 10/14/2007), who was then a child less than fourteen years old, by placing [REDACTED]'s mouth on defendant's penis.

Count VI. Sexual Exploitation Of A Minor Child (573.023-001Y20206499.0)

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The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.023, RSMo, committed the class A felony of sexual exploitation of a minor, punishable upon conviction under Sections 558.011 and 573.023, RSMo, in that on or about May 26, 2021, in the County of Jackson, State of Missouri, the defendant, knowingly created obscene material with a minor, a person less than fourteen years of age, by filming A.H. in the bedroom (D.O.B. 10/14/2007) with A.H.'s mouth on the defendant's penis.

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 VII. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 14 Yoa (566.062-001Y20201199.0)

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 April 27, 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 in the bedroom with [REDACTED]. (D.O.B. 10/14/2007), who was then a child less than fourteen years old, by placing [REDACTED]'s mouth on defendant's penis.

Count VIII. Statutory Rape Or Attempted Statutory Rape - 1st Degree - Person Less Than 14 Yoa (566.032-001Y20201198.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the **felony of attempted statutory rape in the first degree**, punishable upon conviction under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735, and 559.016 RSMo, in that on or about April 26, 2021, in the County of Jackson, State of Missouri, the defendant, in the bathroom, placed defendant's penis on [REDACTED]'s (D.O.B. 10/14/2007) vagina, and such conduct was a substantial step toward the commission of the crime of statutory rape in the first degree of A.H., a child less than fourteen years old, and was done for the purpose of committing such statutory rape in the first degree.

Count IX. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 14 Yoa (566.062-001Y20201199.0)

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

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under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or about April 27, 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 on the couch with [REDACTED]. (D.O.B. 10/14/2007), who was then a child less than fourteen years old, by placing [REDACTED]'s mouth on defendant's penis.

Count X. Statutory Rape Or Attempted Statutory Rape - 1st Degree - Person Less Than 14 Yoa (566.032-001Y20201198.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the **felony of statutory rape in the first degree**, punishable upon convictions under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735, and 559.016, RSMo, that on or about April 27, 2021, in the County of Jackson, State of Missouri, the defendant had sexual intercourse on the couch with [REDACTED] (D.O.B. 10/14/2007), a child less than fourteen years old.

Count XI. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 14 Yoa (566.062-001Y20201199.0)

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 April 27, 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 in the bedroom with [REDACTED]. (D.O.B. 10/14/2007), who was then a child less than fourteen years old, by putting defendant's fingers inside [REDACTED]'s vagina.

Count XII. Statutory Rape Or Attempted Statutory Rape - 1st Degree - Person Less Than 14 Yoa (566.032-001Y20201198.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the **felony of statutory rape in the first degree**, punishable upon convictions under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735, and 559.016, RSMo, that on or about April 27, 2021, in the County of Jackson, State of Missouri, the defendant had sexual intercourse in the bedroom with [REDACTED] (D.O.B. 10/14/2007), a child less than fourteen years old.

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.

PROBABLE CAUSE STATEMENT

Date: 5/5/2021

Report #: 21-25235

I, Chad Cox, 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 4/30/2019, at 0900 Hours, Mike D Myers, (Race- White, Sex- Male, DOB- 01/04/2002, Address-569 Crabapple Ln, Liberty, MO 64068, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 04/27/2021 at 2057 hours, Officer Grasher with the Independence Missouri Police Department was dispatched to [REDACTED] N. Dodgion in regard to a sex offense. Officer Grasher made contact with the calling party, [REDACTED]. (DOB 10/09/1978). [REDACTED] stated her juvenile daughter, [REDACTED]. (DOB 10/14/2007) had been having sex during the day with a male only known as Mike Myers. [REDACTED]. stated she discovered this by going through [REDACTED]'s cell phone and she found videos and pictures of [REDACTED] and Mike Myers in sexual acts. [REDACTED] questioned [REDACTED]. about the videos and pictures and [REDACTED] stated she met Mike Myers on Instagram. [REDACTED]. told [REDACTED]. she had consensual sex with Mike Myers a total of four times starting 04-23-21, 04-24-21 at her grandmother's house in Pleasant Hill and twice in Independence, 04-26-21 and 04-27-21. [REDACTED]. further described Mike Myers as a white male, unknown age, drives a white truck, phone number of 816-[REDACTED], possibly lives in Liberty Missouri and works at a car lot in Independence, Missouri.

[REDACTED] provided Officer Grasher with [REDACTED]'s Iphone which contained the videos and pictures. [REDACTED] provided Officer Grasher with the password to [REDACTED]'s cell phone.

Detective Cox searched [REDACTED]'s cell phone and located several videos and pictures of [REDACTED]. and Mike Myers having sexual intercourse and [REDACTED] performing oral sex on Mike Myers. In the videos and pictures both parties faces were seen and the male, Mike Myers, has a tattoo on his right wrist, "2002".

Detective Cox identified Mike Myers as Michael D. Myers, DOB 01/04/2002, with an address of 569 Crabapple Lane, Liberty, Missouri and an employee of Landmark Dodge. On Mike Myer's Facebook page he had a video of himself showing a vehicle he was trying to sell and in the video he identified himself as Mike Myers.

On 05/05/2021, Detective Cox issued a Persons of Interest for Michael Myers. Myers was later arrested at his work, Landmark Dodge, 1900 S. Noland Road, Independence, Missouri. Myers had in his possession his white iPhone, 816-6-[REDACTED]

Detective Cox later interviewed Mike Myers at police headquarters after advising him of his Miranda Rights. Myers admitted to having sex with [REDACTED]. twice in Pleasant Hill. He also advised that he put his fingers in her vagina and she stimulated his penis with her hand and mouth. Myers further admitted that he did this in front of her 10 and 11 year old cousins. He also stated that he did Facetime two people while she was giving him oral sex and he turned the camera so that they could see her doing this.

Myers was unsure of how many times they had sex in Independence but knew for sure it was at least once at 1708 N. Dodgion, Independence, Jackson County, Missouri. He also admitted to putting his fingers in her vagina and she stimulated his penis with her hand and mouth in Independence, MO multiple times over two days. He stated that he did ejaculate in her mouth and acknowledged that he video tapped that.

Myers admitted to [REDACTED]. performing oral sex on him in the front seat of his truck at a park in Pleasant Hill, Missouri. Mike also admitted to video recording himself having sexual intercourse with [REDACTED]. and also taking

photos of the sex acts with [REDACTED]. using his white iPhone. Myers admitted he sent the videos and or photos to at least six people including the [REDACTED]. Mike admitted he knew [REDACTED]. was only 13 years old, prior to having sexual intercourse with her.

[REDACTED]. Was seen at the Child Protection Center. She stated that she meet Myers on Snap Chat and he asked to come to her house in Independence. She told him that he could not but the following day (04/26/21) he asked again. She stated that she was at her Grandma's house in Pleasant Hill, MO and he asked to come there.

When Myers arrived, he texted [REDACTED], she along with her 10 year old cousin snuck outside and got in his truck. The cousin was in the back seat and she was in the passenger seat. Myers made her take her shirt off when she got in the truck and he played with her breast. They then started to drive around Pleasant Hill, MO and Myers had [REDACTED] stimulate his penis with her hand and mouth. At some point they stopped in a parking lot and they had sex while the 10 year was in the back seat. After having sex they drove around again and Myers had [REDACTED] stimulate his penis again with her hand and mouth. He later took them back to her Grandma's house.

On 04/27/21 Myers came back to Pleasant Hill and came inside [REDACTED]'s grandma's basement. On this incident the 10 year old cousin and 11 year old cousin were also present. Myers sat in a chair in the basement and had [REDACTED] give him oral sex in front of the cousins. He then had sex with [REDACTED] until he ejaculated.

After having sex he had the two cousins and [REDACTED]. get in his truck. [REDACTED] advised that she did not have any pants on when she left the house and rode around in the truck naked from the waste down. While driving around Myers had [REDACTED] stimulate his penis with her hand and mouth. They also stopped at a park and had sex. While they were having sex the cousins got out of the truck and were hanging out in the truck bed. At some point Myers started to FaceTime his friends and showed them that [REDACTED] was giving him oral sex.

They then started to drive around again and [REDACTED] started stimulating Myers' penis with her hand and mouth. She also stated that Myers was putting his fingers in her vagina. Myers told them he was low and gas and drove them back to their Grandma's house and had the cousins go inside and get him money for gas. They brought \$6.00 back outside. [REDACTED]. again gave Myers oral sex while in front of the house. The three girls later went back inside around 0400 hours.

On 04/26/21 Myers texted [REDACTED] and told her that he needed money for gas. Myers then came to her house in Independence around 0900 hours and [REDACTED] gave him \$60. While at the house Myers and [REDACTED] had sex in her bedroom, oral sex and she stimulated him with her hand. They also took a shower together. [REDACTED] and Myers had sex two times in the bedroom, both times [REDACTED] also put her mouth on Myer's penis. [REDACTED]. also put her mouth on Myer's penis in the shower.

On 04/27/21 Myers came back to the residence. The had sex multiple times throughout the day. She stated that she also stimulated him with her mouth and hand several times and he used his fingers in her vagina. [REDACTED] advised that Myers was at her house all day and that they also took a shower that day. She advised that they had sex in the bathroom, the living room and in her bedroom. She stated that Myers told her that he ejaculated at least 4 times inside of her. She also stated that he ejaculated in her mouth and he made her swallow it. [REDACTED] stated that Myers video tapped them having sex and he texted it to her and several other people.

Det. Chad Cox 1475

/s/Det. Chad Cox 1475

Print Name

Signature

