

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

Police# 15-003948
Prosecutor# 095426613
1616-CR *D14EC CH*
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Michael E Mansell
661 Tisha Ln
Grain Valley, MO 64029
DOB: 11/23/1972; Race/Sex: W/M;
SS# [REDACTED]

Defendant.

Count I. Child Molestation 1st Degree - Victim Is Less Than 12 Years Of Age - The Actor Has Previous Conviction Under Chapter 566 Or Inflicts Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/offense Is Part Of Ritual Or Ceremony (566.067-002Y20063601.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.067, RSMo, committed the Class A Felony of CHILD MOLESTATION IN THE FIRST DEGREE punishable upon conviction under Sections 558.011 and 566.067, RSMo, (and subject to lifetime supervision under Section 217.735, RSMo,) in that on or about June 20, 2015, in the County of Jackson, State of Missouri, the defendant knowingly subjected Victim (DOB: 5/16/2007) who was less than twelve years old to sexual contact by placing defendant's hand on Victim's genitals over Victim's clothing.

Count II. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)

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 Unclassified 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 between May 24, 2007 and April 22, 2010, in the

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County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with [REDACTED] who was then less than twelve years old, by touching [REDACTED] genitals with defendant's hand.

Count III. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)

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 Unclassified 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 between May 24, 2007 and April 22, 2010, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with [REDACTED] who was then less than twelve years old, by placing [REDACTED]'s hand on defendant's genitals.

Count IV. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)

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 Unclassified 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 between May 24, 2007 and April 22, 2010, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with [REDACTED] who was then less than twelve years old, by placing defendant's mouth on [REDACTED]'s genitals.

Count V. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)

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 Unclassified 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 between May 24, 2007 and April 22, 2010, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of defendant, had deviate sexual intercourse with [REDACTED], who was then less than twelve) years old, by placing defendant's genitals in [REDACTED] mouth.

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.

THE STATE OF MISSOURI

vs.

Michael E Mansell

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kelsey L. Blackwell
Kelsey L. Blackwell (#63713)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
(816) 881-4593
kblackwell@jacksongov.org

WITNESSES:

PO Robert Ball, 711 Main Street, Grain Valley, MO 64029

[REDACTED]

PB , c/o Jackson County Prosecuting Attorney's Office, Independence, MO
CPT James Beale, 711 Main Street, Grain Valley, MO 64029
DEP Shawn Bloss, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
DET Penny Cole, 3310 NE Rennau Drive, Lees Summit, MO 64064

[REDACTED]

DET Shawn Vaughan, 711 Main Street, Grain Valley, MO 64029
PO Jeremy Verhulst, 711 Main Street, Grain Valley, MO 64029

[REDACTED]

STATEMENT OF PROBABLE CAUSE

Date: 02/01/16

Complaint #2010-0252

I, Det. Shawn C. Vaughan, a Detective with the Grain Valley, Mo. Police Department, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 01/01/2010 at 1115 NW Willow Drive, Grain Valley, Missouri 64029, Michael E. Mansell, W/M, 11/23/1972, 661 SW Tisha Lane, Grain Valley, MO 64029. SOC: [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 4-22-10 at approximately 1735 hours Officers J. Verhulst and J. Beale were dispatched to 1115 NW Willow Drive in regards to a police standby with Children's Division case worker Allison Smith who had received a report of sexual abuse at that location.

Smith advised that it was reported that Michael Mansell had brought a pornographic movie upstairs to juvenile victim's ([REDACTED] room. [REDACTED] left the room to take a shower and started undressing but realized [REDACTED] had forgot [REDACTED]'s shirt in [REDACTED]'s room and went back to get it. When [REDACTED] entered back into [REDACTED]'s room, Mansell was on the bed masturbating with [REDACTED]'s shirt to the pornographic movie. Mansell told [REDACTED] to lie down on the bed. [REDACTED] fell asleep, when [REDACTED] woke up [REDACTED] was lying on the floor without any pants and [REDACTED] legs were positioned strangely with "white silky stuff all over her legs."

Smith contacted [REDACTED]'s mother informing her that Smith was there to investigate a report of sexual abuse in the residence that involved Michael Mansell and [REDACTED]. Smith contacted Mansell and informed him of the allegation and inquired if Mansell had ever touched any of the children inappropriately. Mansell stated that he had never touched any of the children inappropriately at any time.

Smith and Officer Verhulst contacted [REDACTED] and Smith began speaking to [REDACTED] knew what [REDACTED]'s private parts were. [REDACTED] stated she did, [REDACTED]'s breasts and [REDACTED] "P," (vagina.) Smith asked [REDACTED] if Mansell had ever touched [REDACTED]'s private parts. [REDACTED] stated Mansell had touched her vagina both over and under [REDACTED]'s clothing.

[REDACTED] stated on one occasion Mansell was in [REDACTED]'s room when [REDACTED] went to shower. [REDACTED] stated when [REDACTED] re-entered the room [REDACTED] observed Mansell masturbating on [REDACTED]'s bed to a pornographic movie playing on the DVD player in [REDACTED]'s room. [REDACTED] stated on another occasion [REDACTED] had come home late from gymnastics and fallen asleep and when [REDACTED] awoke sometime in the night [REDACTED] noticed Mansell in the room. [REDACTED] fell back asleep but when [REDACTED] awoke the next morning [REDACTED] was on the floor with "white silky stuff, it was kind of clear, all over her legs." [REDACTED] did not know what the "white silky stuff" was on her legs. [REDACTED] stated on another occasion [REDACTED] awoke after Mansell had touched [REDACTED] the previous night and discovered a pornographic movie in [REDACTED]'s DVD player. [REDACTED] stated [REDACTED] took it to her mother to ask what it was and told her mother what Mansell had done to [REDACTED]. [REDACTED] said that her mother told [REDACTED] she did not know what the pornographic movie was and took it from [REDACTED].

On 05-17-10 at approximately 0900 hours, Det. S. Vaughan responded to the Child Protection Center (CPC), 3101 Broadway, Suite 750, Kansas City, Missouri to participate in a CPC Collaborative meeting regarding this case file. Representatives from the CPC, Children's Division, Jackson County, Missouri Family Court, and Jackson County, Missouri

16 APR 12 AM 8:24
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Prosecutors Office were participating in the collaborative meeting. During that meeting it was determined that due to [REDACTED] advising that the statements [REDACTED] had made regarding Michael Mansell were all made up and were lies, there was nothing further that could be completed to pursue criminal charges.

On 05-20-10 at approximately 1410 hours, [REDACTED]'s mother responded to Grain Valley Police Headquarters at the request of the Children's Division to give Det. Vaughan a statement regarding the incident that [REDACTED] had reported. During the interview [REDACTED] mother would consistently change the conversation and would not answer my questions regarding [REDACTED]'s reported incident.

[REDACTED] mother was becoming angrier at the type of questions Det. Vaughan was asking her and when Det. Vaughan asked about Mansell again [REDACTED]'s mother became angry and said "I don't think that Michael would be capable of doing this, but I'm not saying I don't believe [REDACTED]."

Eventually due to [REDACTED]'s mother making statements that could possibly be incriminating herself by not telling Det. Vaughan the truth about the allegations, Det. Vaughan then Mirandized [REDACTED]'s mother. [REDACTED]'s mother then became very angry and vocal saying "I can't believe you treat a victim like this." Det. Vaughan told [REDACTED]'s mother that [REDACTED] was the victim and that if she knew or suspected anything about Michael sexually molesting [REDACTED], then she should want to give Det. Vaughan that information to help [REDACTED]. [REDACTED] mother became very evasive and uncooperative at this time and stated that she wished to speak to an attorney and not answer any further questions.

On 11-24-15 at approximately 0955 hours Officer R. Ball contacted [REDACTED]'s father, who wanted to report that [REDACTED] had recanted the statement that [REDACTED] made to the Child Protection Center (CPC) five (5) years ago. [REDACTED]'s father said that [REDACTED] has been going through counseling and informed the counselor that [REDACTED] had been molested by Michael Mansell but when [REDACTED] went to the CPC interview [REDACTED] told them that [REDACTED] had made up all the allegations. [REDACTED] has since said that her mother pressured [REDACTED] at that time to not make any statements against Mansell while talking to the CPC interviewer. [REDACTED] advised that [REDACTED] was in fact molested by Michael Mansell and was now talking about it again because [REDACTED]'s siblings are still living with [REDACTED]'s mother and Mansell.

On 01/20/16 at approximately 0930 hours, Det. Vaughan received a telephone call from Jennifer McIntyre, who is a Children's Service Worker II for the Missouri Children's Division. McIntyre advised that she was familiar with this case and stated that she had contacted [REDACTED] on 12/22/15 at 12:50 pm to obtain a verbal statement from [REDACTED]. The following is a summary only of the interview with Jennifer McIntyre and [REDACTED], based upon McIntyre's notes that were taken during the interview and is not intended to be a verbatim account nor is it necessarily presented in chronological order.

[REDACTED] told McIntyre that [REDACTED] knew why McIntyre was there and that [REDACTED] would talk to McIntyre but [REDACTED]'s only concern was for [REDACTED]'s siblings because they live with [REDACTED]'s mother and "mom's house is disgusting". [REDACTED] told McIntyre that when [REDACTED] was [REDACTED] and would get home from school only [REDACTED] and Mansell were at home. During that time Mansell would touch [REDACTED] on the "no-no square" which [REDACTED] described as [REDACTED]'s genital and chest areas. [REDACTED] stated that it happened too many times to count and [REDACTED] mother was always gone when it happened.

█ also said that Mansell made █ touch him on his private area but the touching ended when █ was █. █ advised that that there was a time that █'s mother actually walked in on Mansell touching █ while █ and Mansell were both naked lying on the bed. █'s mother told Mansell to get out of the room and later asked █ why █ didn't tell her what Mansell was doing to █. █ told her mother that Mansell told █ not to tell anyone because █ would get into trouble and █ would get hurt. █ advised the touching continued to happen even after █'s mom had walked in on them.

█ also advised that Mansell had touched █'s private area with his mouth and made █ put █ mouth on Mansell's private area. █ stated that Mansell attempted to penetrate █'s genitals a handful of times, but █ screamed and ran out of the room.

█ advised that approximately two years ago, █ found inappropriate things on █'s sibling's IPOD that Mansell had downloaded. █ told McIntyre that █ did not want █'s mother to find out about the new investigation until after Christmas because █ wanted to be able to see █'s siblings at her mother's house.

█ advised that █'s grandparents (mother's parents) knew about what occurred between █ and Mansell because they had moved into █'s grandparent's home (also in Grain Valley, Missouri) for a time and some incidents between █ and Mansell occurred at █ grandparent's residence as well.

When McIntyre spoke to █ about the CPC interview, █ told McIntyre that █ went to the CPC interview, but that █'s mother told █ to say it didn't happen. █ said that █ then made something up to the CPC interviewer and told them that it didn't happen.

On 01/26/16, Det. Vaughan interviewed Michael Mansell who stated that he was aware of the allegations that had been made back in 2010 but said that █ admitted █ had lied about making the allegations. Mansell advised of one incident when he had a pornographic movie in his drawer inside his bedroom but found the pornographic movie in █'s bedroom inside █ DVD player. Mansell said that he had found the DVD in the DVD player when he tried to play a movie for one of the other children. Mansell did not know why the DVD would have been in █'s DVD player. When asked, Mansell advised that he had never watched the pornographic movie inside █'s bedroom. Mansell said that he had found the pornographic movie and was embarrassed. Mansell said that █'s mother had asked him to get the movie out of the house earlier but he forgot to. Mansell said that he "basically told █ that it was not for █ when explaining what the movie was. Mansell took the movie and placed it back into his drawer and later got rid of the movie.

Shawn C. Vaughan #2025
Print Name

Det. S. Vaughan #2025
Signature

Det. Shawn C. Vaughan #2025
Grain Valley Police Dept.

THE COURT FINDS PROBABLE CAUSE

DATE APR 18 2016

J. J. J.
JUDGE

STATEMENT OF PROBABLE CAUSE

JCSD CASE NUMBER 15-03948

DATE 04/06/2016

I, Detective Penny Cole, a deputy with the Jackson County, Missouri Sheriff's Department, upon my oath, and under penalties of perjury, state as follows:

1) I have probable cause to believe that **Michael E. Mansell** (W/M, SS#497-90-9284, DOB 11/23/1972, 661 Tisha Lane, Oak Grove MO 64029) committed one or more criminal offenses.

2) The facts supporting this belief are as follows:

On 06-20-2015 at about 1632 hours, Deputy S. Bloss responded to Children's Mercy Hospital in regard to Sexual Abuse involving a juvenile. Deputy Bloss contacted [REDACTED] who stated that she was the guardian of the victim .

[REDACTED] stated that the victim [REDACTED] informed her that a family friend, Michael E. Mansell (w/m, 11/23/72) had inappropriately touched the victim while at [REDACTED] residence in the early morning hours of 06/20/2015.

On July 6, 2015 the victim was interviewed at CPC by Brandi Hodgkin. The victim advised that Michael Mansell had touched the victim's genitalia on top of the victim's clothing. The victim had been asleep on the couch in the residence, covered with a blanket, when Mansell put his hand under the blanket and touched the victim. Mansell was advised to have been "rubbing" when "he was touching me in the private and I didn't really like it so I slapped his hand and told my grandma".

The victim stated that once the victim had been playing with a friend on a bunk bed when Mansell had attempted to show the victim a video of a female "rubbing on her private". The video had been on Mansell's iPad.

On 08/25/2015 Michael Mansell was transported to Jackson County Headquarters on a stop order in regards to this investigation. Mansell was read Miranda from a prepared, advised that he understood his rights, had no questions and did not want a lawyer present.

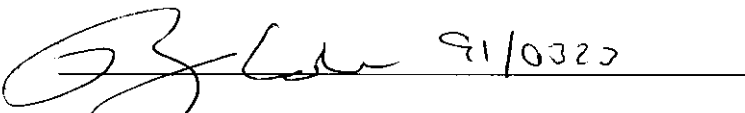
Mansell stated that he knew the victim through a friend. Mansell recalled the day of the allegation and advised that he had gone to the residence to go fishing with a resident of the house. He stated that it was the only time he stayed the night at the residence. Around 0330 hours on 06/20/2015, he returned to the house with the resident. They watched Night at the Roxbury and Mansell fell asleep. According to Mansell the home has several sleeping areas in the living room which were separated by hanging sheets and blankets. Mansell then stated that when he arrived that the victim was on the couch where he was sitting and when he woke up around 0500-0530 hours, the child was in bed with the grandmother. He later stated that the grandmother being in the kitchen had woken him. He denied that he had been drinking or using illegal drugs.

16 APR 12 AM 8:24

JACKSON COUNTY MISSOURI
SHERIFF'S DEPARTMENT


Mansell denied that he had an iPad. He later stated that he had owned an iPad until several months ago when it was stolen. He denied that he had ever shown anyone any pornographic videos on his iPad.

Mansell was asked why the victim would make up a story that he had touched the victim's genitalia. He responded "I've been thinking about this ever since I first heard about it". He did not know why the victim would lie and stated "maybe she dreamt it or somebody else touched her". I pointed out the fact that the child was [REDACTED] and asked if he knew of any [REDACTED] that had dreams about people touching them inappropriately. He advised no. I asked Mansell if there was any reason that he remembered in detail what he did the day that the child stated he had touched the victim and he responded "cause I've been accused of it".


Detective Penny Cole 91/0323
Jackson County, Missouri Sheriff's Department

The court finds probable cause

Judge


APR 18 2016