

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

Police# 16-043268  
Prosecutor# 095432915  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Ricardo D. Staley  
1514 Campbell St.  
Kansas City, MO 64108  
DOB: 04/04/1984; Race/Sex: B/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Rape Or Attempted Rape - 1st Degree (566.030-001Y20131198.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the Felony of Rape in the First Degree, punishable upon conviction under Section 566.030, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about June 17, 2016, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED] by the use of forcible compulsion.

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 (566.060-001Y20131199.0)**

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 566.030, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about June 17, 2016, in the County of Jackson, State of Missouri, the defendant knowingly had deviate sexual intercourse with [REDACTED], by the use of forcible compulsion.

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. Tampering With Motor Vehicle 1st Degree (569.080-002Y20052999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class C felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about June 19, 2016, in the county of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner Eugena Haliburton, possessed an automobile: a 2012 silver GMC Terrain.

The range punishment for a class C 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 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

### **Count IV. Tampering With Motor Vehicle 1st Degree (569.080-002Y20052999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class C felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about June 19, 2016, in the county of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner Ashley Ross, possessed an automobile: a maroon Kia Sedona.

The range punishment for a class C 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 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

### **Count V. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20054899.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the class D felony of resisting a lawful stop, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about June 20, 2016, in the county of Jackson, State of Missouri, PO Charles Prichard, a law enforcement officer, was attempting to make a lawful stop of a vehicle being operated by the defendant, and the defendant knew or reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, resisted the stop of defendant by fleeing from the officer and the defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that the defendant operated at a high rate of speed and failed to obey traffic control devices.

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 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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.**

**Ricardo D. Staley**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

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Lauren D. Barrett (#62062)  
Assistant Prosecuting Attorney  
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WITNESSES:

PO Kenneth W. Allen , 1125 Locust, Kansas City, MO 64106  
PO Donna M. Drake , 5301 E. 27th Street, Kansas City, MO 64127  
Eugena Haliburton , Prosecuting Atty. Office, Kansas City, MO 64106  
PO Jamall Hudson , 1125 Locust, Kansas City, MO 64106  
DET Erica Oldham , 1125 Locust, Kansas City, MO 64106  
PO Charles A. Prichard , 1125 Locust, Kansas City, MO 64106  
SGT Jonathan P. Rivers , 1125 Locust, Kansas City, MO 64106

PO Corey Sanders , 1125 Locust, Kansas City, MO 64106

DET Bradley N. Thomas , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/22/2016

CRN: 16-043268, 16-043862,  
16-043972, 16-043743

I, Detective Brad Thomas #3971 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 06/17/2016, at 1110 Euclid in  
(Date) (Address)

Kansas City, Jackson Missouri Ricardo D. Staley  
(County) (Name of Offender(s))

B/M, 04/04/1984, 6'01/198, bk/bn committed one or more criminal offense(s).  
(Description of Identity)

The facts supporting this belief are as follows:

On 06/17/16 at 2:38 p.m. officers of the Kansas City, Missouri Police Department were dispatched to **1110 Euclid Kansas City, Jackson County, Missouri** in regard to a rape. Upon arrival officers contacted the victim, a 26 year old female who stated the suspect; **[REDACTED] Ricardo Staley** raped her. As the investigation continued it came to detective's attention that Staley was involved in other offenses as well to include a Stolen Auto, Stealing (Purse) and Felony eluding.

In a statement to detectives the victim of the rape (16-043268) said **Staley** came to her residence at 1110 Euclid under the guise of retrieving some property he had left there. **Staley** entered and asked where everyone was. The victim said they were out. **Staley** came up behind the victim as she was in a seated position and wrapped his arm around her throat and pressed her head forward depriving her of air. The victim said **Staley** laid her back and told her to submit or he would kill her. **Staley** removed the victim's pants and underwear then licked her vagina. **Staley** got on top of the victim, penetrated her vagina with his penis and eventually ejaculated inside her. During the rape **Staley** told the victim if she said anything to anyone about what he had done he would kill her and her family. **Staley** made the victim go into the kitchen area afterwards at knife point and ordered her to cleanse her vaginal area with soap and a wash cloth. He reiterated the threat of harming her family and child during the duration of the assault. **Staley** told the victim he would be back on 06/19/16 to rape her again and that she better answer the phone when he called. **Staley** fled the area in a vehicle. The victim was transported to a local hospital to have a sexual assault examination performed.

On 06/21/16 in a follow up interview with the rape victim she stated she has never and would never engage in consensual sex with **Staley** or anyone related to her by blood.

(16-043743) On 06/19/16 **Staley** approached the thirty year old female victim in the parking lot of Wal Mart located at **11601 E. US 40 Highway, Kansas City, Jackson County, Missouri**. The victim said **Staley** engaged her in conversation and told her he needed some money. **Staley** reached into the shopping cart where the victim's purse was sitting and took it. **Staley** fled in a red Minivan which was eventually located and towed for further processing. The officers noted in their report that a purse matching the description of the victim's purse was located inside the minivan and her cell phone was located nearby. The victim identified **Staley** as the

## PROBABLE CAUSE STATEMENT FORM

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suspect via a single photo from a law enforcement bulletin. In a formal statement to detectives the victim reiterated her statement she made to the officers and was shown a photo array. She initially identified Staley in the photo array as being the person who took her purse but then changed her mind and said she wasn't sure.

(16-043862) On 06/20/16 officers responded to **1619 E. 19<sup>th</sup> Street, Kansas City, Jackson County, Missouri** in regard to a Stealing. Upon arrival the 41 year old female victim reported that **Staley** had taken her vehicle without her permission. In a statement to detectives on 06/20/16 the victim said **Staley** has stayed at her residence on occasion but did not live there. She has permitted **Staley** to drive her vehicle once or twice before with her expressed permission. On 06/19/16 the victim had picked **Staley** up and took him to her residence. She went in the bathroom and when she returned she discovered that her wallet, keys and her 2012 GMC Terrain were missing. The victim had not given **Staley** permission to take her wallet, keys or vehicle. In a later communication to the victim **Staley** told her if she called the police he would not stop for them and he would wreck her vehicle. The victim's vehicle was eventually recovered in Kansas City, Kansas after a lengthy vehicle pursuit.

(16-043972) On 06/20/16 officers were on patrol in the area of **Independence and Woodland Ave., Kansas City, Jackson County, Missouri** when they observed the silver GMC Terrain which they recognized as being wanted from a previously issued law enforcement bulletin. Officers attempted to pull the vehicle over to identify the driver. The driver accelerated and refused to stop for the officer. A vehicle pursuit was initiated and the officer pursued the driver, who was eventually identified as **Staley** throughout the Northeast area of Kansas City, Missouri. The officer stated in his report that **Staley** drove his vehicle at a high rate of speed and with reckless abandon for others' safety as they pursued him. **Staley** got onto I-70 west and continued driving at a high rate of speed, driving recklessly as he weaved in and out of highway traffic almost causing several collisions. The pursuit continued into Kansas City, Kansas where **Staley** drove to a dead end street and was taken into custody.

**Staley** was arrested and transported to the Wyandotte County jail. Detectives responded to Wyandotte County and advised **Staley** of his rights which he waived. **Staley** initially denied having sex with the victim but eventually admitted to it, however **Staley** claimed the sex was consensual. **Staley** admitted that he stole the victim's purse from her shopping cart and said he had left the red minivan in the area of Armour and Harrison where officers located it. **Staley** said that he took the victim's keys and left in her vehicle. When asked about failing to stop for officers **Staley** admitted he knew they were attempting to stop him and said that he doesn't stop for the police.

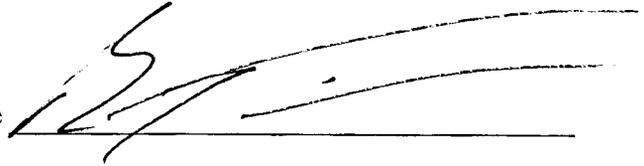
PROBABLE CAUSE STATEMENT FORM

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Lab results are pending in regard to the rape.

Printed Name Det. Brad Thomas #3971

Signature



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

\_\_\_\_\_  
Judge

Circuit Court of \_\_\_\_\_ County, State of Missouri.