

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

Police# 16-063464
Prosecutor# 095434647
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Dontae D. Jefferson
7602 E. 99th St
Kansas City, MO 64134
DOB: 01/17/1987; Race/Sex: B/M;
SS# [REDACTED]
Defendant.

Count I. Rape in the First Degree (566.030-001Y20131103.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Dontae D. Jefferson**, 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 August 26, 2016, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED] by the use of forcible compulsion.

Count II. Burglary in the First Degree (569.160-001Y19792205.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Dontae D. Jefferson**, in violation of Section 569.160, RSMo, committed the **Class B Felony of Burglary in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about August 26, 2016, in the County of Jackson, State of Missouri, the defendant knowingly remained unlawfully in an inhabitable structure, located at 1300 Cherry St., Kansas City, Missouri, and possessed by [REDACTED], for the purpose of committing rape in the first degree therein, and while in such inhabitable structure there was present in such inhabitable structure [REDACTED] a person who was not a participant in the crime.

Count III. Sexual Abuse in the First Degree (566.100-003Y20131115.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Dontae D. Jefferson**, in violation of Section 566.100, RSMo, committed the **Class C Felony of Sexual Abuse in the First Degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about August 26, 2016, in the County of Jackson, State of Missouri, the defendant knowingly subjected [REDACTED] to sexual contact by the use of forcible compulsion, to wit by touching [REDACTED]'s genitals.

Count IV. Sexual Abuse in the First Degree (566.100-003Y20131115.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **Dontae D. Jefferson**, in violation of Section 566.100, RSMo, committed the **Class C Felony of Sexual Abuse in the First Degree**, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about August 26, 2016, in the County of Jackson, State of Missouri, the defendant knowingly subjected [REDACTED] to sexual contact by the use of forcible compulsion, to wit by touching [REDACTED]'s breast.

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.

Dontae D. Jefferson

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

Sydney Paquette (#56888)
Assistant Prosecuting Attorney
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Kansas City, Missouri 64106
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WITNESSES:

Det. Sean B. Clarke, 1125 Locust, Kansas City, MO 64106

[REDACTED]

Det. Donna M. Drake, 5301 E. 27th Street, Kansas City, MO 64127

Det. Thomas M. Hammond, 1125 Locust, Kansas City, MO 64106

[REDACTED]

[REDACTED]

PO Walter Loving, 1125 Locust, Kansas City, MO 64106

[REDACTED]

Det. Timothy M. Perry, 1125 Locust, Kansas City, MO 64106

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

Det. Brian J. Wellington, 1125 Locust, Kansas City, MO 64106

PO Kelsey S. Wingate, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 09/06/2016

CRN: 16-063464

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 08/26/2016, at 1300 Cherry in
(Date) (Address)

Kansas City, Jackson Missouri Dontae D. Jefferson
(County) (Name of Offender(s))

B/M, 01/17/87, 6'01/170, Bk/Bn committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 08/26/16 at 5:24 p.m. officers of the Kansas City, Missouri Police Department were dispatched to the Jackson County Detention Center at 1300 Cherry St., Kansas City, Jackson County, Missouri in regard to a rape. Upon arrival they contacted the victim who stated the victim was fondled by a black male the victim believed to be a guard.

On 08/26/16, the victim said in the victim's initial statement to police officers that a black male guard had entered the victim's cell, kissed the victim, grabbed the victim's breasts and fondled the victim's buttocks. The victim pushed the black male suspect off of the victim and he became more aggressive and continued to fondle the victim. The victim heard someone whistle and the black male suspect ran out of the victim's cell and hid.

On 08/27/16, officers were dispatched to a local hospital where they contacted the victim, who stated the victim had not told law enforcement all the details of what had occurred in the victim's cell on 08/26/16. The victim said the victim was scared to speak in front of Jackson County Jail staff. In the victim's statement to detectives the victim said the suspect entered the victim's cell and described him as being a tall, skinny black male wearing a Jackson County issued orange t-shirt on his head like a "dew rag." During the interview with the detectives, the victim identified the suspect in a photo lineup as Dontae Jefferson (B/M, 01/17/87, 6'01/170, Bk/Bn). Once Jefferson entered the cell he walked over to the victim's bed and began to fondle the victim over the victim's clothing. The victim told Jefferson "Stop I have a boyfriend." The victim then started pushing away from Jefferson and he grabbed the victim with one hand and strangled the victim. With the other hand Jefferson punched the victim in the left temple. Jefferson crawled into the victim's bed and "spooned" the victim from behind. Jefferson put his hands up underneath the victim's shirt and fondled the victim's breast, skin to skin. Jefferson then placed his hand inside victim 2's pants and began to rub the victim's vagina. The victim said Jefferson did not penetrate the victim's vagina with his fingers. Jefferson pulled the victim's pants down and inserted his penis into the victim's vagina. Jefferson continued to have vaginal sex with the victim until the victim heard a whistle coming from the hallway. Jefferson immediately stopped and got off the bed so that he could hide. When Jefferson felt safe enough he left the victim's cell.

PROBABLE CAUSE STATEMENT FORM

CRN 16-063464

In an interview with Witness 1, he said on 08/24/16, he observed a guard leave the keys in [redacted] door and [redacted] was able to gain control of the keys. Witness 1 stated that [redacted] handed the guard the keys back, but kept the cell key. Witness 1 said on 08/26/16, [redacted] exited his cell, went back and forth between cells and eventually let himself and **Jefferson** out of their cells.

In an interview with Witness 2 she admitted losing control of her keys when she left them in [redacted] door. Witness 2 said when she got the keys back they had all been accounted for.

The officers viewed video surveillance on site and observed on 08/26/16 between 2:40 a.m. and 4:30 a.m., three prisoners wandering freely about the lockup area, to include the area where the victim was housed. The three prisoners were identified by Witness 3 as [redacted] Witness 1, and **Dontae Jefferson**.

Surveillance video was obtained from the jail by detectives and watched at length. It was determined that [redacted] had obtained a cell key on 08/24/16 when a guard, identified as Witness 2 mistakenly left the keys in his cell door lock. [redacted] was able to gain control of the keys through a small door in the cell door. The guard got the keys back a short time afterwards. It is observed in the video that shortly after Witness 2 walks away, [redacted] reaches through the small door and manipulated the area around the cell door lock. The cell door opens then closes. Video was obtained for 08/26/16 for the area where [redacted] Witness 1 and **Jefferson** were housed in the jail. In that video [redacted] can be clearly seen opening his cell door and exiting his cell. At 3:58 a.m. a guard escorts the victim to the victim's cell and the guard departs the area. Shortly afterwards, [redacted] and **Jefferson** both exit their cells and go into the area where the victim is housed, until 4:22 a.m., at which time [redacted] returns to his cell. **Jefferson** is still in the area where the victim is being housed. At 4:57 a.m. **Jefferson** returns to his cell.

The victim completed a Sexual Assault Examination and lab results are pending. In the report completed by medical staff they noted the victim had Ecchymosis (bruising) above the victim's left eye and left forearm. The crime scene was processed and lab results are pending.

Jefferson and [redacted] declined to provide statements to detectives.

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.