

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

Police# 160329487
Prosecutor# 095433501
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**James M Combs
2944 Iva Ct.
Independence, MO 64057-1474
DOB: 04/04/1979; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Statutory Rape 2nd Degree (566.034-001Y19951116.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.034, RSMo, committed the class C felony of statutory rape in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that Between December 1, 2014 and June 30, 2016, in the County of Jackson, State of Missouri, the defendant had sexual intercourse with [REDACTED] and at that time [REDACTED] was less than seventeen years old and the defendant was twenty-one years of age or older.

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.

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.

James M Combs

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,



Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

[REDACTED]

CHF Tom Dailey , , ,
SGT Tyson Gardner , 504 E. Blue Pkwy, Lees Summit, MO 64063
DET Virgil Garner , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED]

[REDACTED]

SGT Jeffrey Rajer , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

DET Steven Schmidli , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED]

MISSOURI STATE HIGHWAY PATROL
PROBABLE CAUSE STATEMENT

STATE OF MISSOURI }

MISSOURI STATE HIGHWAY PATROL

COUNTY OF JACKSON }

CASE # 160329487

DATE: July 28, 2016

OCN: NA

I, Sergeant Tyson Gardner, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

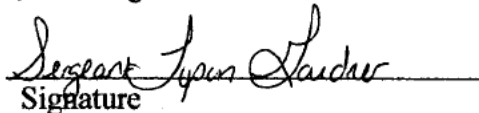
1. I have probable cause to believe that James M. Combs, on or between December 2014 and June 2016, at _____, committed the offense(s) listed below:

Felony 566.064 566.064-001Y19951199.0 Statutory Sodomy in the 2nd Degree

2. State the facts that support a finding of probable cause to believe crime(s) was/were committed and that the accused committed the crime(s):

On May 25, 2016, at the request of the Independence Police Department, I initiated an investigation into allegations of sexual assault by James M. Combs against a female juvenile identified as [REDACTED]. During course of the investigation, probable cause was developed to believe Mr. Combs had deviant sexual intercourse with [REDACTED] on numerous occasions at his residence located Independence, Missouri, between December 2014 and June 2016. [REDACTED] reported she first had sexual intercourse with Mr. Combs at his residence when she was 14 or 15 years of age and continued her sexual contact with Mr. Combs to her current age. Mr. Combs had deviant sexual intercourse with [REDACTED] by penetrating her vagina with his penis, fingers and tongue on numerous occasions while she was under the age of 17. During the same period of time, additional sexual contact occurred between Mr. Combs and M.P. through the touching of his genitals with [REDACTED]'s hands and mouth. All the acts described above occurred while Mr. Combs had knowledge's of [REDACTED] age and was aware of her juvenile status.

I, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.


Signature

07/28/16
Date