

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	17-000069
PROSECUTOR NO. :	095438120

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JUAN D CONTRERAS,)	
AKA JUAN DE DIOS CONTRERAS-AQUINO,)	
JUAN AQUINO, JUAN DELIOS-)	
CONTRERAS)	
1033 18th Ave.,)	CASE NO. 1716-CR
Greeley, CO - 80631)	DIVISION
DOB: 03/08/1994)	
Race/Sex: H/M;)	
SSN: [REDACTED])	
)	DEFENDANT.

COMPLAINT

**Count I. Rape Or Attempted Rape - 1st Degree - Aggravated Sexual Offense
(566.030-002Y20171198.0)**

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 February 24, 2017, in the county of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED] a person who was incapable of consent because of intoxication or a drug-induced state and was manifestly unable and known by defendant to be unable to make a reasonable judgment as to the nature or harmfulness of the sexual intercourse.

An individual convicted and sentenced for this offense is required to be sentenced to life imprisonment without eligibility for probation and parole until the defendant has served thirty years.

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.

State vs. Juan D Contreras

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Amory K. Lovin
Amory K. Lovin, #68688
Assistant Prosecuting Attorney
415 East 12th Street
Kansas City, MO - 64106
(816) 881-3834
aklovin@jacksongov.org

WITNESSES:

Katya R Ceballos Diaz, Prosecuting Atty. Office, Kansas City, MO - 64106
Det. Tim Maybell, 5005 Oak St., Kansas City, MO - 64112

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P.O. Phillip Murphy, 5005 Oak St., Kansas City, MO - 64112

PROBABLE CAUSE STATEMENT FORM

Date: 02/28/2017

CRN: 17-0069

I, Det. Sgt. Maybell
(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 02/24/2017, at 5000 Oak St room# [REDACTED] in
(Date) (Address)

Kansas City, Jackson Missouri Contreras, Juan D, H/M, 03/08/1994
(County) (Name of Offender(s))

_____ committed one or more criminal offense(s).
(Description of Identity)

Rape

The facts supporting this belief are as follows:

On 02/23/2017 at about 2100hrs, the suspect, victim and the two witnesses all met at 5000 Oak St, room [REDACTED] to go to a dance club in Lawrence Kansas. The victim stated that the suspect drove her vehicle with her and the witnesses to a store in Lawrence Kansas where they bought some alcohol. The victim stated that she consumed about a half of beer prior to arriving at the dance club. The victim said that she and the suspect danced on the dance floor for a while. The victim said that she and the suspect went over to a couch to relax. The victim stated that the suspect offered to buy her some drinks so she let him. The victim said that the suspect returned to the couch with a blue fruity alcoholic beverage. The victim said that she drank the beverage that the suspect gave her, and does not remember anything after that until the following morning at about 0700hrs on 02/24/2017. The victim said that when she woke up her pants and underwear were off, her shirt was on backwards and her bra was undone. The victim said that she asked the suspect what happened and the suspect told her that they had sex. The victim became very angry with the suspect accusing him of raping her and she began to strike him several times in the face while stating to him that he raped her. The victim said that all she had to drink that entire night was two shots at about 1800hrs on 02/23/2017, the half of beer from the store they stopped at and the blue fruity alcoholic drink that the suspect brought to her. On 02/25/2017 the victim went to North Kansas City hospital for a rape examination. The suspect stated when they left the dance club and got back to [REDACTED], the victim was too intoxicated to walk into the building and up to the room, so he had to carry her up there. The suspect said that the victim only had about two alcoholic drinks while they were together. The suspect said that while at the dance club the victim was dancing with him and even kissed his neck.

PROBABLE CAUSE STATEMENT FORM

CRN 17-0069

There is video from [redacted] security cameras showing the suspect carrying the victim into building at about 0118hrs on 02/24/2017. She appears to be passed out, and missing a shoe off her right foot.

The suspect admitted to having sex with the victim in her intoxicated stated. The suspect stated that he had sex with the victim twice that night. The suspect stated that he had sex with the victim at about 0200hrs and again at about 0315hrs on 02/24/2017. The suspect did admit that the victim was highly intoxicated and even called her a "light weight" when it comes to her handling her alcohol.

Witness# 1 who was with them that entire night and was there upon arriving at Johnson Hall was in the room with the suspect and the victim when the suspect was having sex with the victim and confirmed that the suspect did have sex with the victim twice that night and about the times listed by the suspect. Witness# 1 did say that the victim appeared to be highly intoxicated and was mostly asleep but moaning while the suspect had sex with the victim from what she recalls. Witness# 2 who was with the group that night also confirmed that the victim was too intoxicated to walk on her own so that is why the suspect carried the victim into the building and up to the room. Witness# 2 stated that the victim was so intoxicated that when the suspect laid her on the bottom bunkbed she rolled off the bed and fell onto the floor. Witness# 2 said that the suspect then put both mattresses on the floor and put the victim on it as not to get hurt if she was to fall off the bed again.

Printed Name Det. Sgt. Tim Maybell#56 Signature Det. Sgt. Maybell

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

Judge

Circuit Court of _____ County, State of Missouri.