

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

Police# 14-68701
Prosecutor# 095420680
1716-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Michael S McNurlin
104 S. Lacy
Independence, MO 64056
DOB: 05/24/1964; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

**Count I. Statutory Sodomy in the First Degree
Deviate Sexual Intercourse with Person less than 12 (11095120)**

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 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 about June 1, 2014, through August 31, 2014, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of Michael S. McNurlin, had deviate sexual intercourse with [REDACTED] (D.O.B.: 12/1/03), who was then less than twelve years old, by defendant placing his hand on [REDACTED]'s genitals. 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. Statutory Sodomy in the First Degree
Deviate Sexual Intercourse with Person less than 12 (11095120)**

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 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 about June 1, 2014, through August 31, 2014, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of Michael S. McNurlin, had deviate sexual intercourse with [REDACTED] (D.O.B.: 12/1/03), who was then less than twelve years old, by defendant placing his mouth on [REDACTED]'s genitals. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

THE STATE OF MISSOURI

vs.

Michael S McNurlin

**Count III. Statutory Sodomy in the First Degree
Deviate Sexual Intercourse with Person less than 12 (11095120)**

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 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 about June 1, 2014, through August 31, 2014, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of Michael S. McNurlin, had deviate sexual intercourse with [REDACTED] (D.O.B.: 12/1/03), who was then less than twelve years old, by defendant placing his penis in [REDACTED]'s hand. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

**Count IV. Statutory Sodomy in the First Degree
Deviate Sexual Intercourse with Person less than 12 (11095120)**

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 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 about June 1, 2014, through August 31, 2014, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of Michael S. McNurlin, had deviate sexual intercourse with [REDACTED] (D.O.B.: 12/1/03), who was then less than twelve years old, by defendant placing his penis in [REDACTED]'s anus. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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 S McNurlin

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Erika Lawler (#56213)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
(816) 881-4613
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WITNESSES:

Det. John Roach, 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]

[REDACTED]. Lexington, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 10/7/2014

Report #: 14-68701

I, John Roach, a Detective with the Independence, Missouri, Police Department, 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 between June 2014 through September 2014, at 104 S. Lacy, Independence, Jackson County Missouri, Michael S. McNurlin, (Race: White, Sex: Male, DOB:05-25-1964, Address: 104 S. Lacy, Independence Jackson County Missouri, SSN: [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 09-30-14 [REDACTED] (10-28-69) and [REDACTED] (11-07-90) responded to the Independence Police Department to report a sexual abuse case involving Defendant McNurlin and the Victim [REDACTED]. [REDACTED] and [REDACTED] were both interviewed by Detective Roach.

[REDACTED] advised that on 09-23-14 the Victim disclosed to [REDACTED] sexual abuse from Defendant McNurlin to the Victim. The Victim advised that Defendant McNurlin touched the Victims genitals with his hands and mouth on more than one occasion. The Victim also advised that Defendant McNurlin would make the Victim touch Defendant McNurlin's genitals as well.

[REDACTED] advised that [REDACTED] would visit Defendant McNurlin at his home and help him with household chores. [REDACTED] advised that when [REDACTED] would go to the home [REDACTED] would bring the Victim with [REDACTED]. [REDACTED] stated that the visits occurred between June of 2014 and September 2014 and that the Victim was at Defendant McNurlin's house five to ten times over the summer.

On 10-06-14 the Victim was taken to the Child Protection Center where the Victim was interviewed by Forensic Interviewer B. Hodgkin. During the interview the Victim disclosed that the sexual abuse began in June of 2014. The Victim disclosed that the abuse would occur at night when everyone in the house was asleep. The Victim said that Defendant McNurlin would wake the Victim up and ask the Victim to come and get into bed with Defendant McNurlin. The Victim advised that Defendant McNurlin would then touch the Victim's genitals with his hand and "masturbate" the Victim. The Victim also disclosed that Defendant McNurlin would put his lips on the Victim's buttocks and genitals. The Victim said that this would occur every time the Victim was at Defendant McNurlin's home.

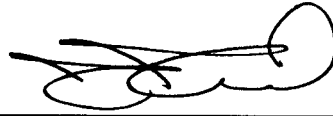
The Victim disclosed to Hodgkin that over Labor Day weekend 2014, the Victim and [REDACTED] stayed at Defendant McNurlin's house. The Victim said that on one of the nights Defendant McNurlin woke the Victim up and took him to his bed. The Victim said that Defendant McNurlin began to sexually abuse the Victim, got on top of the Victim, and began to move "back and forth and side to side". The Victim said that the Victim tried to get up at one point but Defendant McNurlin held the victim down and stated "I'm almost done, you can't get up until I am done".

The Victim disclosed that later during the same incident Defendant McNurlin tried to put his penis into the "butthole" of the Victim. The Victim said that Defendant McNurlin put the Victim

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on the Victim's stomach and got on top of the Victim. The Victim advised that Defendant McNurlin then got on top of the Victim and began to insert his penis into the buttohole of the Victim. The Victim advised that "it hurt too much for him to do that" so Defendant McNurlin stopped.

Detective John Roach



Print Name

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Oct 17, 2014

Judge

