

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

<b>POLICE NO. :</b>	17-099195
<b>PROSECUTOR NO. :</b>	095442546

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>JOHNNY R. DUNLAP</b>	)	
<b>4440 Highland Ave.,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64110</b>	)	<b>DIVISION</b>
<b>DOB: 07/21/1997</b>	)	
<b>Race/Sex: B/M;</b>	)	
<b>SSN: XXX-XX-XXXX</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim  
(565.050-001Y19841399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony assault in the first degree**, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about November 22, 2017, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to ■ a corrections officer with the Jackson County Detention Center, by a plastic cone, and in the course thereof ■ was a special victim as defined by Section 565.002.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment. The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count II. Armed Criminal Action (571.015-001Y19755299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the **felony of armed criminal action**, punishable upon conviction under Section 571.015.1, RSMo, in that on or about November 22, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault I, and the defendant committed the foregoing felony of Assault in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument, to wit a: a plastic cone.

**State vs. Johnny R. Dunlap**

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

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.

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

*/s/ Kate E. Brubacher*  
Kate E. Brubacher (#69555)  
Assistant Prosecuting Attorney  
415 East 12th Street, 11th Floor  
Kansas City, MO - 64106  
KEBrubacher@jacksongov.org

**WITNESSES:**

[REDACTED]

[REDACTED]

DET Randy K. Evans , 1125 Locust, Kansas City, MO - 64106

[REDACTED]

[REDACTED]

DET David D. Kissee , 1125 Locust, Kansas City, MO - 64106

DET Dawn M. Minor , 1125 Locust, Kansas City, MO - 64106

**State vs. Johnny R. Dunlap**

DET Kimberlee Jo Rice , 1125 Locust, Kansas City, MO - 64106

DET Dawn N. Wilson , 1125 Locust, Kansas City, MO - 64106

**PROBABLE CAUSE STATEMENT FORM**

Date: 11-23-2017

CRN: 17-99195

I, Detective David Kissee #3101, of the 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 11-22-2017, at 1300 CHERRY ST in  
(Date) (Address)

Kansas City, Jackson Missouri JOHNNY R DUNLAP  
(County) (Name of Offender(s))

Race:Black , Sex:Male , DOB:07/21/1997, SSN [REDACTED] committed one or more criminal offense(s).  
(Description of Identity)

***Aggravated Assault- Special victim- Corrections officer  
Armed Criminal Action***

The facts supporting this belief are as follows:

On 11-22-2017 at 2239 hours officers of the Kansas City, Missouri Police Department were dispatched to Truman Medical Center located at 2301 Holmes St in regard to an assault on a corrections officer. The officers found that the victim, who is a Jackson County, Missouri Adult Detention Corrections Officer, was on duty in "C" Pod at 1300 Cherry St., Kansas City, Jackson County, Missouri when he was assaulted by an inmate.

The incident was captured on the video surveillance system maintained by the Jackson County Department of Corrections.

Detectives responded to the hospital and observed the victim was intubated, sedated and unable to provide a statement. Detectives were advised by medical staff that the victim received fractures to several facial bones, nasal bones and damage to the sinus on the right side, Medical staff advised the victim had a sub-dermal and sub-arachnoid hemorrhage/bleed (brain bleed). Medical staff advised the victim was in critical condition.

Detectives responded to the Detention Center and spoke with other inmates in the pod. One of the inmates slipped detectives a note underneath his cell door indicating he witnessed the assault where the inmate (DUNLAP) who is housed next to him attacked the Corrections Officer.

PROBABLE CAUSE STATEMENT FORM

CRN 17-99195

Detectives reviewed and obtained the surveillance footage. Detectives observed **DUNLAP** assaulting the victim for approximately eight minutes using several items including a plastic cone to hit the victim. The victim is observed to be unconscious for a length of the attack.

Detectives interviewed **DUNLAP** who upon waiving his Miranda rights provided a statement. During the interview **DUNLAP** claimed he assaulted the victim due to pent up anger toward his perception of racism towards him for being black. **DUNLAP** could not point to specific events or an action where the victim was acting in a racist manner except for saying he (the victim) did not want to be black. **DUNLAP** then claimed he assaulted the victim due to mental health issues and claimed to be diagnosed with schizophrenia and bi polar disorder in which he heard voices telling him to go get him and that he deserves to have his ass beat. At the conclusion of the interview **DUNLAP** said he would like to apologize to the victim if he makes it through.

Printed Name Detective David Kisse #3101 Signature \_\_\_\_\_

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

\_\_\_\_\_  
Judge

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