

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

Police# 104540485  
Prosecutor# 095436927  
1716-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Michael J. Gullett**  
**Crossroads Correctional Center 1115 SE Pence Road**  
**Cameron, MO 64429**  
**DOB: 12/20/1955; Race/Sex: W/M;**  
**SS# [REDACTED]**  
**Defendant.**

**Count I. Murder 2nd Degree (565.021-001Y19840904.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about May 27, 2004, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Ryon McDonald caused the death of Ryon McDonald by striking him,

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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 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.



## STATEMENT OF PROBABLE CAUSE

Date: January 20, 2017

Police # 04168048000

I, Darron F. Blankenship, a Criminal Investigator with the Missouri State Highway Patrol, upon my oath and under penalties of perjury, state as follows:

1. I have probable cause to believe (Michael Gullett, white male, date of birth December 20, 1955, Crossroads Correctional Center, 1115 E Pence, Cameron, Missouri) committed one or more criminal offenses in Jackson County, Missouri

2. The facts supporting this belief are as follows:

a. On May 29, 2004 a human leg was located at the Missouri River access in Callaway County, Missouri. On May 30, 2004, two fisherman located a human torso in the Missouri River near the 177.5 mile-marker in Moniteau County, Missouri. The head and both legs were missing from the torso. The leg and torso were matched by DNA comparison on June 16, 2004.

b. Doctor Valerie Rao conducted a three-day autopsy at the Boone County Medical Examiner's Office from June 2, 2004 until June 4, 2004. During the autopsy it was believed the bone of the leg had been cut with a heavy instrument such as an axe or hatchet. There were tool marks on the torso from where the head and legs were removed that matched the tool marks from the leg. It was also noted, there were fractured ribs in the torso. Doctor Rao suggested the above described wounds were postmortem and stated the traumatic injuries could explain the cause of death may be found with the victim's head. Doctor Rao believed the leg and torso were dumped in the river between late Thursday, May 27, 2004, to early Saturday, May 29, 2004.

c. On July, 23, 2015, Aaron McDonald an Arizona resident contacted the Missouri State Highway Patrol concerning his missing brother, Ryon McDonald. Aaron McDonald had been on the Missouri State Highway Patrol Missing Person Website in an attempt to locate his brother. During his search, he discovered information and pictures of tattoo's unique to his brother Ryon.

d. A lab report from the Missouri State Highway Patrol Laboratory dated February 16, 2016, was issued. The report explains the DNA comparison was conducted between the victim and his mother. The report indicates with high probability; the victim is in fact Ryon McDonald.

e. On April 7, 2016, I interviewed [REDACTED] [REDACTED] concerning this investigation. [REDACTED] said one night he heard the suspect, Michael Gullett and the victim arguing. He witnessed Gullett pick up a piece of wood and hit McDonald's head with it.

█████ said the victim fell to the ground and was not moving. █████ ran over to where Gullett and the McDonald were to question Gullett's actions. █████ said Gullett picked up a crowbar and struck him (█████) in the neck which knocked him out.

f. █████ said a few hours later he regained consciousness. █████ said he did not see the victim but noticed his belongings including his tent were still there. █████ described the piece of wood Gullett hit the victim with as a big block of wood, similar to those they used to burn in their fires.

g. █████ further stated he was worried about what occurred so within a couple of days he left the camp to go stay with a friend. █████ said he began hearing people talking about Gullett cutting the victim up and throwing him in the river.

h. I asked █████ if he remembered the time of year this incident occurred. █████ said it was so long ago and he did not want to try and guess. █████ said the weather was nice but not too hot at the time. █████ said it had to be before the 4th of July, because he wasn't at the camp to observe aerial fireworks. █████ said the year the incident occurred was 2004.

i. █████ stated the camp he was living in and location of this incident was an area along the Missouri River near Front Street and Kansas Avenue, Jackson County, Missouri.

j. On April 14, 2016, I interviewed █████ as part of my investigation. █████ stated one night while eating dinner with Gullett, █████ brought up the victim and asked Gullett when he thought he would be coming back. According to █████ Gullett said, "He aint ever coming back. I hit him in the head, cut him up with an axe and threw him in the river." █████ thought it was late spring or early summer of 2004, when the conversation took place.

k. I asked █████ if Gullett ever mentioned killing anyone else. █████ said Gullett talked about killing two Mexicans because he didn't like them. █████ further stated he always thought Gullett was just talking tuff so no one would mess with him.

l. On April 21, 2016, I interviewed Michael Gullett concerning the death of Ryon McDonald. Gullett asked where the body was recovered. Gullett said it would not be a surprise if Kansas City arrested him for what occurred in 2004. Gullett further stated he has been sweating it since 2004. Gullett said he thought when the police came to see him in 2004, he thought they would arrest him then and is not sure why they did not.

m. On August 19, 2016, Kansas City Police Department Detective Brent Taney and I interviewed █████. During the interview, we asked █████ about the victim. █████ stated he heard Gullett killed him but could not recall any specific information. █████ stated Gullett had an axe he kept in his tent or close


by. ██████ stated he witnessed Gullett kill another person during the same time period as McDonald's murder.

n. An interview with the victim's father, Ronald McDonald and Ronald's current wife Lola, confirmed the last time Lola spoke with the victim was October 2003. Lola said the victim told her he was staying in a homeless camp in Kansas City.

o. To date, the Patrol has not released the identity of the victim or how he was dismembered.

DARRON BLANKENSHIP

Print Name (Detective)

  
Signature (Detective)

**THE COURT FINDS PROBABLE CAUSE:**

\_\_\_\_\_  
Date

\_\_\_\_\_  
Judge