

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

POLICE NO. :	19-004185
PROSECUTOR NO. :	095452752
OCN:	ca013540

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 JAMES A.R. HUGHES)
)
 1053 SW 51 Rd) CASE NO. 1916-CR
)
 Deepwater, MO 64740) DIVISION
)
 DOB: 09/02/1999)
)
 Race/Sex: B/M)
)
)
)
 DEFENDANT.)

COMPLAINT

Count I. Attempted Robbery - 1st Degree (570.023-001Y20171201.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class B felony of attempted robbery in the first degree**, punishable upon conviction under Section 562.012 and 558.011 , RSMo, in that on or about May 19, 2019, in the County of Jackson, State of Missouri, the defendant forcibly stole currency owned by Holiday Inn Express, and such conduct was a substantial step toward the commission of the offense of robbery in the first degree, and was done for the purpose of committing robbery in the first degree and in the course thereof defendant displayed and threatened the use of what appeared to be a dangerous instrument.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

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 May 19, 2019, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree charged in Count 1, all allegations of which are incorporated herein by

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reference, and the defendant committed the foregoing felony of Attempted Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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.

Count III. Assault 1st Degree Or Attempt (565.050-002Y19791399.0)

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 B felony of assault in the first degree**, punishable upon conviction under Section 562.012 and 558.011, RSMo, in that on or about May 19, 2019, in the County of Jackson, State of Missouri, the defendant hit [REDACTED] with a gun, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count IV. Assault 1st Degree Or Attempt (565.050-002Y19791399.0)

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 B felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about May 19, 2019, in the County of Jackson, State of Missouri, the defendant kicked [REDACTED], and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count V. Assault 1st Degree Or Attempt (565.050-002Y19791399.0)

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 B felony of assault in the first degree**, punishable upon conviction

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under Section 558.011, RSMo, in that on or about May 19, 2019, in the County of Jackson, State of Missouri, the defendant hit [REDACTED] with a gun, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of [REDACTED], and was done for the purpose of committing such assault.

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 B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) 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.

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/ Alison Schenkelberg

Alison Schenkelberg (#69325)
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WITNESSES:

1. DET Chad Albin, 10 NE Tudor, Lee's Summit, MO 64086

2. PO Sydni Beeman, 10 NE Tudor, Lee's Summit, MO 64086

3. [REDACTED]
[REDACTED]
[REDACTED]

64106

6. DET Kevin Dibben, 10 NE Tudor, Lee's Summit, MO 64086

[REDACTED]
[REDACTED]

64106

10. PO Chris Drake, 10 NE Tudor, Lee's Summit, MO 64086
[REDACTED]

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12. CIV Jessica Johnson, 10 NE Tudor, Lee's Summit, MO 64086

13. [REDACTED]

[REDACTED] PO Kent Miller, 10 NE Tudor, Lee's Summit, MO 64086

17. PO Lukas Pace, 10 NE Tudor Road, Lees Summit, MO 64086

[REDACTED], MO 64063

21. PO Bradford Severn, 10 NE Tudor, Lees Summit, MO 64086

22. DET James Treacy, 10 NE Tudor, Lee's Summit, MO 64086

23. PO Phil Tucker, 10 NE Tudor, Lee's Summit, MO 64086

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 1-19-4185

Date: May 20, 2019

I, Detective Kevin Dibben, a Detective with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 05/19/2019, at 1201 NW Innovation Parkway, Lee's Summit, Jackson County Missouri, James A.R. Hughes, B/M, 09/02/1999, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 05/19/2019 Officers with the Lee's Summit Police Department responded to 1201 NW innovation Pkwy, Lee's Summit, Jackson County, Missouri (Holiday Inn Express) on a reported armed robbery in progress. Dispatch told them a black male wearing a yellow jersey was threatening to shoot everyone in the business. Officers arrived on scene and located the suspect in the front lobby of the business. The suspect, James Hughes, was taken into custody. Victims and witnesses were transported to the Lee's Summit Police Department and provided the following statements:

- Det. Treacy conducted an interview of [REDACTED], an employee of the business. [REDACTED] said she heard a disturbance and went to the office to look at the video surveillance. As she entered, a black male wearing a yellow shirt entered the office, pointed a handgun at her and yelled "get the fuck down!" [REDACTED] said she ran, and the suspect chased her. She exited the business with the suspect still following. The suspect fell down and she was able to get away.
- Det. Dibben conducted an interview of [REDACTED], a guest staying at the hotel. He said he and his family were walking through the lobby to exit the hotel. He said the suspect exited before them and they followed him out. [REDACTED] said when he and his family reached their vehicle, the suspect removed a gun from his waistband and pointed it at him. The male said "I'm going to shoot you," then made [REDACTED] go back inside the business. He said the suspect followed him into the business, while still pointing the gun at him. Once they entered the business, the suspect began to chase an employee, so [REDACTED] was able to escape.
- Det. Treacy conducted an interview of [REDACTED], another employee of the business. [REDACTED] said she walked into the laundry room and saw a black male wearing a yellow shirt pointing a gun at someone. She said he noticed her, turned the gun toward her and yelled at her to get down. The black male hit her on the head, shoulders and back with the gun approximately 3-5 times.
- Det. Dibben conducted an interview of [REDACTED], another employee of the business. [REDACTED] said she saw the suspect acting strange inside the building. She said she heard him yelling at another employee, then saw him chasing that employee with a gun. She ran to an office with another employee. The suspect tried to follow them, but they barricaded the door. She said the suspect was able to enter the office through another door. [REDACTED] said once in the office, the suspect told her to open the safe, then to "get on your knees or I'll rape you bitch." She said she got on the ground and he kicked her shoulder. [REDACTED] said the male then went to the laundry room and she was able to go to another office and lock the door. [REDACTED] was taken to the hospital for treatment of injuries she received during the incident.

- Det. Treacy conducted an interview of [REDACTED], an employee of the business. [REDACTED] said the suspect was acting strange, so she and other employees were watching him on video surveillance. She said the suspect left the business, then reentered with another hotel guest, whom he had at gunpoint. He then pointed the gun at her and told her to get down [REDACTED] said she instead, entered an office and closed the door. The suspect tried to push the door open but was unable to. Instead, he walked around the front desk and was able to enter the office through a separate door. She said he pointed the gun at her, asked where the money was and told her to open the safe. She responded by telling him she did not have the combination. [REDACTED] said the suspect punched her, beat her with his gun, then picked up an empty plastic Walmart bag. She said the suspect put the bag over her head and tried to strangle her by squeezing her neck for 10-15 seconds, leaving her unable to breathe. She said the male then released her, picked up a vacuum and threw it at her, striking her in the head.

On the floor inside the business, Officers located an olive green CO2 powered BB gun with a silver slide. In an office, they located the plastic Walmart bag James put over [REDACTED] head.

Det. Albin responded to the business and recovered video surveillance of the incident. The video clearly showed James inside the business with a gun in his hand. It showed him chasing people, pointing the gun at them and striking them with the gun. James can be seen punching [REDACTED] in the head, placing a bag over her head and strangling her. He can be seen picking up a vacuum and throwing it at [REDACTED], striking her in the head.

These events occurred in the city of Lee's Summit, Jackson County, Missouri.

Det. Kevin Dibben #0712

Print Name (Detective)

/s/ Det. K. Dibben #0712

Signature (Detective)