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

POLICE NO.:	04-075042
PROSECUTOR NO. :	095459419
OCN:	
STATE OF MISSOURI,)
PLAIN	NTIFF,)
vs.)
)
MICHAEL J. GULLETT)
Crossroads Correctional Center, 1115 SE	Pence) CASE NO. 2016-CR
Road	
Cameron, MO 64429) DIVISION
DOB: 12/20/1955)
Race/Sex: W/M)
)
DEFENI	DANT.)

COMPLAINT WARRANT REQUESTED

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 July 3, 2004, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Steven Cassidy caused the death of Steven Cassidy by striking him with an axe.

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 statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

State vs. Michael J. Gullett

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/ Jennifer S Tatum
Jennifer S Tatum (#70789)
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
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jtatum@jacksongov.org

WITNESSES:

- 1. CST Melissa (Thompson) Steinke, 6633 Troost, Kansas City, MO 64131
- 2. Kenneth Barens, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 3. SGT Darron Blankenship, 504 E. Blue Pkwy, Lees Summit, MO 64063
- 4. CST Robert D. Blehm, 1125 Locust, Kansas City, MO 64131
- 5. Lonnie Lee Boler, 2500 E. Harmony Road #420, Fort Collins, CO 80528
- 6. Charles Closson, 6633 Troost Ave., Kansas City, MO 64131
- 7. Alice L. Dearing, 6633 Troost, Badge#10460, Kansas City, MO 64131
- 8. SGT Jeffrey L Downing, 1125 Locust, Kansas City, MO 64106
- 9. Michael Finnegan Ph.D, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 10. Michael W. Goring, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 11. CST Deborah Hagen, 1001 NW Barry Rd., Kansas City, MO 64155
- 12. SGT Harold D Headrick, 1125 Locust, Kansas City, MO 64106
- 13. DET Amber B. Hoffman, 1125 Locust, Kansas City, MO 64106
- 14. SGT Donie Hoffman, 1125 Locust, Kansas City, MO 64106
- 15. Gregory S. Hummel, 6633 Troost, Badge #15307 LAB, Kansas City, MO
- 16. Noel Job, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 17. Charlene Kidd, 1125 Locust, Kansas City, MO 64106
- 18. Miguel Laboy Dr., Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 19. Joe Marinella, KCPD, 1125 Locust Street, Kansas City, MO 64106
- 20. LBT Jennifer McMurray, Kansas City Police Crime Lab, 2645 Brooklyn Ave, Kansas City, MO 64127
- 21. David Miller, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
- 22. Kenneth D. Miller, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

State vs. Michael J. Gullett

- 23. DET Randall L Morris, 1125 Locust, Kansas City, MO 64106
- 24. Kurt Mueller, Missouri State Highway Patrol, 1510 East Elm Street, Jefferson City, MO 65101
- 25. DET David S. Needham, 1125 Locust, Kansas City, MO 64106
- 26. DET Darin K. Penrod, 1125 Locust, Kansas City, MO 64106
- 27. DET Chad M. Rives, 1125 Locust, Kansas City, MO 64106
- 28. DET Keith J Steinbach, 1125 Locust, Kansas City, MO 64106
- 29. Gregory Vanryn,
- 30. PO Alexander E. Wasser, 1125 Locust, Kansas City, MO 64106
- 31. DET Matthew S. Williams, 1125 Locust, Kansas City, MO 64106

STATEMENT OF PROBABLE CAUSE

Date: June 4, 2020 Police #04168048000 (KCPD CRN:04-075042)

- I, Lieutenant 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, 609 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 August 17, 2004, at approximately 1445 hours, officers of the Kansas City Missouri Police Department contacted a witness (now deceased) in the area of Front Street and North Kansas Avenue, Jackson County, Missouri. The witness directed officers to an area where a person known as "Little Mike" later identified as Mike Goring buried a body of a white male at the direction of Michael Gullett.
- b. On August 17, 2004, Michael Goring gave a video recorded statement to members of the Kansas City Missouri Police Department under Miranda Warning. Goring sated he buried an unknown male who had been killed by Michael Gullett on July 3, 2020. Goring stated, Michael Gullett stood in front of the victim after a physical altercation and said, "You've met your maker, I'm your maker". Goring stated Gullett pushed the victim to the ground and he and a subject known only as "G" started beating the victim. Goring stated the victim pleaded for them to stop. Gullett informed the victim they would tell him when they were done. According to Goring, Gullett continued kicking the victim until he stopped moving. Goring stated he observed Gullett standing over the victim with an axe offering "G" the opportunity to hit the victim with it. Goring said he went in side of a tent. Upon returning, he observed a bloody axe near the victim and blood all over Gullett. He further advised there was no visible blood on "G".
- c. On August 18, 2004, Kansas City Missouri Police Detectives recovered the skeletal remains of a human body in the area referred to by the deceased witness and Goring. An examination of the remains revealed there were injuries to the cranium and cervical spine probably caused by a sharp, heavy instrument. Due to decomposition, the body was not immediately identified. It was 2008 before officers determined that the body belonged to Steven Allen Cassidy.
- d. On October 28, 2004, members of the Kansas City Missouri Police Department contacted Gullett. Gullett declined to speak with detectives without an attorney.
- e. On Wednesday, December 4, 2019, I arrived at the Western Missouri Correctional Center (WMCC), 609 East Pence Road, Cameron, Missouri, for the purpose of facilitating a phone call with Gullett and his son William (Will) Gullett. I previously promised Gullett that I would put him in touch with his son while investigating the murder of Ryon McDonald,

which occurred approximately three months prior to the death of Cassidy. I waited until Gullett was sentenced to prison for the murder of McDonald before facilitating the phone call. I also wanted to ask him about Cassidy's homicide.

- f. In 2016, I was asked to investigate a cold case homicide from 2004. In the summer of 2004, a leg was discovered in the Missouri River in Callaway County and a leg and torso in Moniteau County. The victim, who was later identified as Ryon McDonald was believed to have been killed in a homeless camp in Kansas City, Missouri then put in the Missouri River. During my investigation, I was able to identify and locate several witnesses to that murder. The murder of McDonald occurred three months prior to that of Cassidy. McDonald was not identified until years after his death (killed in 2005; Identified in 2015).
- g. During an interview on August 19, 2016, with Michael Goring, a white, male, date of birth March 10, 1949, I learned Goring had witnessed another homicide committed by Gullett. For more information concerning this investigation, refer to Kansas City Missouri Police Department, Report #04-75042.
- h. During my December 4, 2019, interview with Gullett, I informed Gullett of the Miranda Warning by reading it from a Missouri State Highway Patrol pocket card SHP-352B. Gullett acknowledged non-verbally he understood his rights.
- i. I asked Gullett what was the trigger that made him take the guy out? Gullett began telling me about trauma he endured as a child. In the aforementioned case, Gullett said if he didn't do something the victim may have done something to his (victim's son "G"). At this time, it is not known if the victim had a biological son.
- j. I asked Gullett why he didn't put the body in the river. Gullett said he was so disgusted by what had occurred, he just grabbed a bottle of rum and wanted to be left alone.
- k. Gullett gave the victim's "son" an opportunity to kill the victim after Gullett knocked the victim out with a three-pound blacksmith hammer. The "son" didn't want to do and told Gullett to finish him off. Gullett admitted to killing the man three months after he killed Ryon McDonald which matches up with the time-line. I asked Gullett why he didn't get rid of the axe. Gullett said he did.
- l. Gullett named the victim as Cassidy which I had never mentioned. Cassidy was the 2004 unsolved victim homicide from KCPD who was identified through testing 2008. Gullett had observed Cassidy's name on a duffle bag.
- m. A summary of events from Gullett:

And then, I'm like, what now? You know, 'cause he wasn't dead. He was unconscious. And he came to. He came to after a minute or two while I was talking to the son. So, I knelt down on the ground and grabbed his arms and held his arms and his son started kicking him in the face. And then he lost consciousness again. So, I let go of him and started talking to the son again. Well, what are we gonna do now? You know, gonna take him? Gonna take him into the emergency room? Get him fixed up. We'll be safe right here? Or

is he gonna come back here and try to get revenge, or? Son said, well, I don't know what he wants to do. What he's going to do. So, I said well, do you want to just get it over with? Finish up out here and be done with it? Son said that's what he wanted to do. He just didn't have the heart to do it. So, I'm the one that needs to put an end to it.

- n. Gullet said he did hand the boy ("G) the axe. He said he couldn't do it. I said well what do you want what do we need to do here? Cause he wasn't dead at this point in time.
- o. Gullett said he knocked the victim unconscious and asked "G", what do you want to do? Gullett said he asked "G" do you just want to finish this and get this over with and never have to worry about this problem again? Gullett said he asked "G" if you take him out of here can you promise me he won't come back. That there won't be any more problems in the future with him. According to Gullett "G" satated he could not promise that. Gullett told "G" I said he would just finish it here and get it over with and be done with it and never have to worry about it again?
- q. I asked Gullett if he had only killed four men. Gullett replied, three of them he is finished with as far as court goes and this one involving Cassidy.
- r. I asked Gullett if he knew this victim's name to be Cassidy as I had never brought it up. Gullett said he did because it was the name printed on his duffel bag.
- s. Gullett said before Cassidy was dead, he tried to get him to leave the camp without Success. Gullett further explained is was drink at the time so his memory may be a little' "fuzzy". Gullett said he thought he hit Cassidy in the head with a three pound blacksmith hammer.
- t. I asked Gullett if he had any remorse for killing Cassidy. Gullett replied, "Well, I think it's bad to have to take anybody's life. I mean I really do. Some I feel worse about than others. But, Cassidy is kinda low on the list. The way he was treating his son. And his son also told me he was beat on his mom. Yeah, so he's kinda low he's kinda low in my book.
- u. I asked Gullett why he didn't want this case adjudicated. Gullett replied, "Well, I don't I really don't think that the court really cares about the circumstances. I think all they care about is getting it off the books. I don't know If that was the case. I wouldn't have a problem with it. I mean, if they want to make a deal like that just run concurrent with what I've already got. If all they want to do is just get it off the books, I ain't got no problem with that.

THE COURT FINDS PROBABLE CAUSE:	
Date	