

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

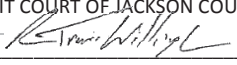
FILED

DIVISION 26

15-Mar-2024 15:55

POLICE NO. :	KC24008128
PROSECUTOR NO. :	095477796
OCN:	

CIRCUIT COURT OF JACKSON COUNTY, MO

BY  DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

WARREN ERIC CARTER

DOB:

Race/Sex: B/M

S.S.N.: A.K.A.

DEFENDANT.

CASE NO. 2416-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Kidnapping (565.110-001Y19001099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class A felony of kidnapping, punishable upon conviction under Section 558.011, RSMo, in that on or about July 7, 2012, in the County of Jackson, State of Missouri, the defendant unlawfully confined Victim 1 without Victim 1's consent for a substantial period for the purpose of holding Victim 1 to perform a sexual act for the return or release of Victim 1.

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 years and not to exceed thirty years, or life imprisonment. 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. Forcible Sodomy - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Sexual Intercourse With More Than One Person/victim Is Less Than 12 Years Old - Wantonly Vile (566.060-994Y20021199.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the felony of forcible sodomy, punishable upon conviction under Section

566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about July 7, 2012, in the County of Jackson, State of Missouri, the defendant, for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with Victim 1 by placing the defendant's penis in Victim 1's mouth by the use of forcible compulsion, and in the course of such offense the defendant displayed a deadly weapon in a threatening manner.

The range of punishment for the unclassified felony of forcible sodomy where the defendant displayed a deadly weapon in a threatening manner is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count III. Forcible Rape - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of Age/wantonly Vile (566.030-999Y20021198.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the felony of forcible rape, punishable upon conviction under Section 566.030, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about July 7, 2012, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with Victim 1 by the use of forcible compulsion, and in the course of such offense the defendant displayed a deadly weapon in a threatening manner.

The range of punishment for the unclassified felony of forcible rape where the defendant displayed a deadly weapon in a threatening manner is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than fifteen years. 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. Kidnapping - 1st Degree (565.110-001Y19001099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class A felony of kidnapping in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about May 12, 2017, in the County of Jackson, State of Missouri, the defendant unlawfully confined Victim 2 without Victim 2's consent for a substantial period for the purpose of holding Victim 2 to perform a sexual act for the return or release of Victim 2.

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 years and not to exceed thirty years, or life imprisonment. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

**Count V. Sodomy Or Attempted Sodomy - 1st Degree - Aggravated Sexual Offense
(566.060-002Y20171199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the felony of sodomy in the first degree, punishable upon conviction under Section 566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about May 12, 2017, in the County of Jackson, State of Missouri, the defendant, for the purpose of arousing or gratifying the sexual desire of the defendant, knowingly had deviate sexual intercourse with Victim 2, by the use of forcible compulsion by placing the defendant's penis in Victim 2's mouth, and defendant, during the course of such conduct, displayed a deadly weapon in a threatening manner.

The range of punishment for the unclassified felony of sodomy in the first degree where the defendant displayed a deadly weapon in a threatening manner is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

**Count VI. Rape Or Attempted Rape - 1st Degree - Aggravated Sexual Offense
(566.030-002Y20171198.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the offense of rape in the first degree, punishable upon conviction under Section 566.030, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about May 12, 2017, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with Victim 2 by the use of forcible compulsion, and defendant, during the course of such conduct, displayed a deadly weapon in a threatening manner.

The range of punishment for the unclassified felony of rape in the first degree where the defendant displayed a deadly weapon in a threatening manner is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than fifteen years. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count VII. Kidnapping - 1st Degree (565.110-001Y19001099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class A felony of kidnapping in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or between October 7, 2019, and October 17, 2019, in the County of Jackson, State of Missouri, the defendant unlawfully confined Victim 3

without Victim 3's consent for a substantial period for the purpose of holding Victim 3 to perform a sexual act for the return or release of Victim 3.

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 years and not to exceed thirty years, or life imprisonment. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count VIII. Sodomy Or Attempted Sodomy - 1st Degree (566.060-001Y20131199.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the felony of sodomy in the first degree, punishable upon conviction under Section 566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about October 11, 2019, in the County of Jackson, State of Missouri, the defendant, for the purpose of arousing or gratifying the sexual desire of the defendant, knowingly had deviate sexual intercourse with Victim 3 by the use of forcible compulsion by placing the defendant's penis in Victim 3's mouth.

The range of punishment for the unclassified felony of sodomy in the first degree is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count IX. Rape Or Attempted Rape - 1st Degree (566.030-001Y20131198.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.030, RSMo, committed the offense of rape in the first degree, punishable upon conviction under Section 566.030, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about October 11, 2019, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with Victim 3 by the use of forcible compulsion.

The range of punishment for the unclassified felony of rape in the first degree is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years. An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

Count X. Sodomy Or Attempted Sodomy - 1st Degree (566.060-001Y20131199.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.060, RSMo, committed the felony of sodomy in the first degree, punishable upon conviction under Section 566.060, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, in that on or about December 26, 2019, in the County of Jackson, State of Missouri, the

State vs. Warren Eric Carter, Case No.

defendant, for the purpose of arousing or gratifying the sexual desire of the defendant, knowingly had deviate sexual intercourse with Victim 4, by the use of forcible compulsion by placing the defendant's penis in Victim 4's mouth.

The range of punishment for the unclassified felony of sodomy in the first degree is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years. 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 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.

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/ Kendall E. Foley

Kendall E. Foley (#74649)
Assistant Prosecuting Attorney
415 E. 12th Street
Kansas City, MO 64106
(816) 881-3293
kfoley@jacksongov.org

WITNESSES:

The State's witnesses as of 3/15/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 3/13/2024

CRN: 24008128
15-Mar-2024 15:53

FILED
DIVISION 26

CIRCUIT COURT OF JACKSON COUNTY, MO
BY [Signature] DCA

I, Detective Alyssa Stuedle #5807, Kansas City Missouri Police Department, Special Victim's Unit
(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 7/7/2012 - 12/26/2019, at various locations in
(Date) (Address)

Kansas City, Jackson Missouri Warren Carter
(County) (Name of Offender(s))

B/M committed one or more criminal offense(s).
(Description of Identity)

Forcible Rape
Forcible Sodomy
Armed Criminal
Unlawful Use of a Weapon
Assault

The facts supporting this belief are as follows:

In regard to Victim 1

On 7/2/2012, officers from the Kansas City Missouri Police Department were dispatched to [REDACTED]
[REDACTED], Kansas City, Jackson County, Missouri regarding a rape.

Upon arrival, officers contacted Victim 1 who stated she was in the area of East 29th Street and Prospect Avenue when she was approached by an unknown black male (suspect – later identified as Warren Carter) occupying a dark colored four-door vehicle which she believed to be a Mercedes-Benz. She stated Carter stopped his vehicle and pointed a black handgun at her and said, “Bitch, get in the car or I will kill you.” Victim 1 told officers she entered Carter’s vehicle because she was afraid of being shot. Once she was in the car, Carter drove them to the area of [REDACTED] [REDACTED] [REDACTED] (Kansas City, Jackson County, Missouri) where he forced her to perform oral sex on him. After she performed oral sex on him, Carter then raped her by vaginally penetrating her vagina with his penis. She stated Carter did not wear a condom and she was unsure if he ejaculated during the rape. When Carter stopped raping her, he drove around in circles. He finally stopped the vehicle, and she stated she exited the car and ran to her grandmother’s house for help.

After getting away from Carter, Victim 1 ran to a family member’s house in the area to call 911. The victim was then transported by EMS to an area hospital for a sexual assault examination. During this investigation Victim 1 described Carter as having a prosthetic right leg. During an interview with detectives the victim was presented a photo lineup where she positively identified Carter as the individual who had assaulted her.

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On 8/8/2012, detectives interviewed Carter. He was read his Miranda Warnings and waiver and stated he “knew what his rights were because he had been to prison before.” After being read his rights Carter agreed to speak to the detectives and provide a statement. When detectives presented Carter a photo of Victim 1 and asked if he knew who the individual in the photo was, Carter stated he believed she was a prostitute. Carter told detectives he and the victim had gotten into an altercation over money. Carter stated he frequently patronizes prostitutes along Independence Avenue or Prospect Avenue. He said most of the time he doesn’t pay them what they had initially agreed on and often will “short” them because “they will raise the price after you have sex with them.” During his interview with detectives a sample of Carter’s DNA was recovered through a buccal swab.

A forensic comparison of Carter’s DNA to the DNA that was recovered from the victim’s sexual assault examination revealed a CODIS (Combined DNA Index System) “hit” or confirmation to Warren Carter.

Carter had a dark-colored 1997 Jaguar XJ6, license [REDACTED], registered to him.

In regard to Victim 2

On 5/14/2017 officers from the Kansas City Missouri Police Department were dispatched to Belton Regional Medical Center (17065 South US 71 Highway) in regard to a reported rape that occurred in Kansas City, Jackson County, Missouri.

Upon arrival officers contacted Victim 2 who stated on 5/12/2017 she was walking in the area of East 25th Street and Michigan Avenue, Kansas City, Jackson County, Missouri when she was approached by an unknown black male (suspect – later identified as Warren Carter) occupying a black GMC SUV. Victim 2 stated she was walking down the sidewalk when the black SUV pulled onto the sidewalk blocking her from the intersection. After stopping her, Carter asked her several times if she needed a ride, but she continued to tell him “No.” After a brief conversation Carter exited the SUV and produced a handgun, pointed the gun at her and told her to “get in the car by the count of three.” Victim 2 stated she “feared for her life” and complied with Carter’s instructions.

Once she was in the vehicle, Carter drove them to a secluded place in the area of East 23rd Street and Paseo (Kansas City, Jackson County, Missouri). Once they were parked Carter told her “I’m going to get something from you.” He then pulled his penis out of his pants and told her to perform oral sex on him. When she initially told Carter “No,” he grabbed her by the hair and forced her head down to his penis. Victim 2 stated she tried to push herself away from Carter but was unable to. When she tried to resist Carter, he only became more aggressive and angry towards her. He told her to turn away from him and to recline her seat. Once her seat was reclined and almost flat Carter pulled himself over into her seat positioning himself behind her. The victim stated she was lying on her stomach in the passenger seat when Carter vaginally penetrated her from behind. She said Carter did not wear a condom during the assault and did ejaculate inside of her. Once he was finished Carter pulled himself back over into the driver’s seat and then used his cane to push her out of the car. He then drove away from the area in an unknown direction of travel.

On 5/14/2017, Victim 2 responded to Belton Regional Medical Center to undergo a sexual assault examination.

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During her statement to police, Victim 2 described Carter as 44-55 years of age, 5'7"-5'10" and missing his right leg. During her interview, detectives presented her with a photo lineup, where she positively identified Carter as the individual who assaulted her.

Victim 2 stated that she called 911 on the evening of 5/12/2017 to report the assault and gave up after waiting on hold for a long time. Victim 2 stated that she also went to a KCPD police station on 5/13/2017, but left without speaking to anyone after waiting for an extended period of time.

A computer check of Carter revealed that he was issued a warning citation on 3/20/2017 while driving a black GMC Envoy.

On 5/25/2017, Carter was taken into custody in regard to this investigation. On 5/26/2017, Carter was advised of his Miranda Rights which he waived and agreed to provide a statement. During his interrogation Carter was presented a photo of Victim 2, after viewing the photo Carter stated he did know her because she is a prostitute who "works" along the Prospect Avenue corridor. Carter admitted to patronizing her as a prostitute and that she entered his GMC Envoy and agreed to perform oral sex on him in exchange for money. Carter stated he drove them to the area of East 23rd Street and Paseo, and after she performed her sex act, he only paid her half of what they had agreed on, which upset her. During his interrogation Carter denied ever brandishing a gun at the victim.

In 2022 the victim's sexual assault evidence was outsourced to an outside agency crime lab for forensic processing and comparison. The results of that comparison are still pending.

In regard to Victim 3

On 10/17/2019 officers from the Kansas City Missouri Police Department were dispatched to [REDACTED], Kansas City, Jackson County, Missouri in regard to a rape. Upon arrival officers contacted Victim 3 who stated five to seven days ago she was walking west along East 9th Street between Prospect Avenue and Paseo Blvd. when she was picked up an unknown black male (suspect – later identified as Warren Carter).

In a statement to police Victim 3 stated as she was walking she had ordered a Z-Trip, so she wasn't initially startled by Carter's vehicle when he approached her. Thinking the vehicle was her Z-Trip she approached it and got into the front passenger seat. She described the car as being a four-door, crimson or wine colored sedan with Lexus floor mats. She stated she remembered Carter as being 35-45 years of age, and missing a leg; however, she could not remember which one.

Victim 3 stated once she was in the car she realized that Carter had a dark colored handgun in his lap in between his legs. She said Carter kept talking to her like she was a prostitute and told her he wanted oral and vaginal sex from her. She told Carter she was not a prostitute and told him to pull the car over so she could get out. When she tried to pull on the door handle, she thought he must have had the child safety locks on because she was unable to open the door. She stated Carter then drove them to the area of East 10th Street and Brooklyn Avenue (Kansas City, Jackson County, Missouri), where he parked. She stated after he pulled his penis out of his pants he put a condom on and forced her to perform oral sex on him. He then began to vaginally penetrate her, but

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could not keep his penis erect. The victim stated Carter then became more upset and demanded that she get out of his car. Once she was out of the car, Carter drove away in an unknown direction.

The victim stated she did respond to an area hospital a couple of days after the assault but could not remember the date or time that she had gone. While at the hospital she did consent to a sexual assault examination.

During her interview with detectives the victim was presented a photo lineup, where she was able to rule out four of the six men presented to her. It should be noted one of the two men the victim could not decide between was Warren Carter. A computer check of Carter at the time of this investigation revealed him to drive a 2008 Lexus bearing a Missouri License Plate. A computer check through the License Plate Reader system revealed that Lexus to be maroon in color.

It should be noted that Carter was excluded as a DNA contributor in the victim's sexual assault kit. However, the sexual assault examination was performed several days after the assault, the suspect used a condom during the assault, and the victim admitted to having consensual sex with her consensual partner in between being assaulted and going to a hospital.

In regard to Victim 4

On 12/26/2019, officers of the Kansas City Missouri Police Department were dispatched to [REDACTED], on a reported rape. Upon arrival, officers contacted Victim 4 who stated that an unknown black male (later identified by DNA as Warren Carter) contacted her at the BP Gas Station at Truman and Paseo (Kansas City, Jackson County, Missouri), in a red colored SUV. He offered her a ride and she got into the passenger seat. Carter drove her to the area of 9th and Paseo (Kansas City, Jackson County, Missouri) and forced her to perform oral sex on him and he ejaculated into her mouth. Carter had a handgun in the car and the victim felt threatened. Carter then drove her to "Freedom Fountain" located at Cleaver II Blvd. and Cleveland Ave. (Kansas City, Jackson County, Missouri). Carter ordered her out of the vehicle and told her to take her pants off. Victim 4 got into the backseat of the vehicle with Carter, where Carter inserted his penis into her vagina, and had intercourse with her. Carter ejaculated and Victim 4 left the scene and was able to find a ride to the church at [REDACTED] where 911 was called.

After Victim 4's initial statement to officers, the victim was transported to an area hospital where she consented to a sexual assault examination.

In 2019, detectives attempted to contact Victim 4 with negative results and therefore did not obtain a formal statement. On 03/05/2024, detectives responded to the victim's residence where Victim 4 provided a formal statement in regard to this incident. Victim 4 stated she was put in a car by a black male with a prosthetic right leg at "Freedom Fountain" and that the man asked her to give him oral sex and she "tried to" and she "bit his shit" and got away. During her interview with detectives Victim 4 was presented a photo lineup, where she was unable to positively identify Warren Carter. It should be noted that Victim 4 self-reports having Alzheimer's and stated she has a difficult time remembering the details of the assault.

PROBABLE CAUSE STATEMENT FORM

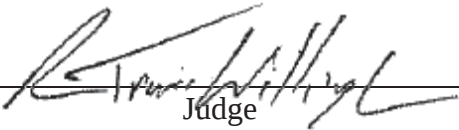
CRN 24008128

A forensic comparison of Carter's DNA to the DNA that was recovered from the victim's sexual assault examination revealed a CODIS (Combined DNA Index System) "hit" or confirmation to Warren Carter.

I am requesting an arrest warrant be issued for Carter in regard to all the aforementioned cases and a bond to be associated to that warrant.

Printed Name Detective Alyssa Stuedle #5807 Signature /s/ Detective Alyssa Stuedle #5807

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



Judge

Circuit Court of _____ County, State of Missouri.