

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

Police# 2015-5766  
Prosecutor# 095430530  
1616-CR  
OCN#

**COMPLAINT**

**STATE OF MISSOURI**

vs.

**Ricky W Manning  
1116 SW Summit Dr.  
Lees Summit, MO 64081  
DOB: 06/05/1975; Race/Sex: W/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Rape Or Attempted Rape 1st Degree - Serious Physical Injury/displays Deadly  
Weapon Or Dangerous Instruments/subjects Victim To Sexual Intercourse With More  
Than One Person (566.030-002Y20131103.0)**

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 Rape in the First Degree, punishable upon conviction under Section 566.030, RSMo, and subject to lifetime supervision under Section 217.735, RSMo, on July 8, 2015, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED], by the use of forcible compulsion.

**Count II. Statutory Rape 2nd Degree (566.034-001Y19951116.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.034, RSMo, committed the Class C Felony of Statutory Rape in the Second Degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about July 8, 2015, in the County of Jackson, State of Missouri, the defendant had sexual intercourse with [REDACTED], and at that time [REDACTED] was less than seventeen years old and the defendant was twenty-one years of age or older.

**Count III. Statutory Sodomy 2nd Degree (566.064-001Y19951199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.064, RSMo, committed the Class C Felony of Statutory Sodomy in the Second Degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about July 8, 2015, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with [REDACTED], to wit: defendant touched [REDACTED]'s genitals with his fingers, and at that time [REDACTED] was less than seventeen years old and the defendant was twenty-one years of age or older.

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.

**THE STATE OF MISSOURI**

**vs.**

**Ricky W Manning**

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Kelsey L. Blackwell  
Kelsey L. Blackwell (#63713)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, Missouri 64050  
(816) 881-4593  
kblackwell@jacksongov.org

WITNESSES:

[REDACTED] c/o: Jackson County Prosecutor's Office, Independence, MO 64050

[REDACTED]  
[REDACTED]

# STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 2015-5766

Date: March 4, 2016

I, Detective Mark Wiley, an investigator 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 07-08-15, at 1553 SW Shelby Ct., Lee's Summit, Jackson County Missouri, Ricky W. Manning, w/m, 06-05-75, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 07-08-15 Lee's Summit, MO Police Officers Treacy and Drake were dispatched to St. Luke's East Hospital located at 100 NE Saint Luke's Blvd. Lee's Summit, Jackson County, Missouri regarding a reported sex offense.

Upon their arrival Officers Treacy and Drake contacted the victim's mother (TR), victim's friend's mother (RM) and the victim's friend (KM) in the lobby of the hospital. After getting their account of events Officers contacted Registered Nurse LP.

LP told Officers when the 15 year old victim arrived she was hysterical. When the victim calmed down she stated she did not wish to see her mother for fear of what she may think, as well as maintaining her friendship with KM. She went on to say Ricky Manning forced her to have sex with him. The victim then pointed to her vagina. The victim went on to say RM walked in the room during the incident and intervened. LP told Officers the victim also disclosed Ricky Manning threatened her by saying if she told anyone, his friend "Tony", "Would solve the problem".

A sexual assault exam was conducted and physical evidence was collected at Saint Luke's East Hospital.

On 07-15-15 at 11:32am a Forensic Interview was conducted with the Child Protection Center located at 3101 Broadway in Kansas City, Jackson County, MO with the victim. During the interview the victim disclosed the following account of events of the evening of 07-07-15 to 07-08-15.

On 07-07-15 the victim and KM went on a double date. At some point their dates dropped the victim and KM back at 1553 SW Shelby Ct. Lee's Summit, Jackson County, Missouri 64081 where KM resides with RM and Manning. The victim and KM then watched movies. The victim stated during the evening a friend of Ricky Manning arrived at the residence to visit with Manning who was at the residence along with RM. The victim reported Manning consumed beer and vodka while his friend was at the residence. At some point in the evening the victim and KM went to sleep in the same room, but different beds.

The victim disclosed Manning waking the victim up and stating he needed to talk to her. The victim stated Manning was wearing boxer shorts at the time. The victim then went to the living room of the residence and asked Manning what was wrong. At this point Manning instructed the victim to take her clothes off, lay on the floor and have sex with him. Manning told the victim if she told anyone she would not see KM anymore and he would tell his friend who is in the Kansas City Mob. The victim disclosed telling Manning to let her go back upstairs and pretend this incident had not occurred. Manning then grabbed the victim by the wrist and when the victim tried to pull away Manning squeezed harder resulting in bruising.

Manning then removed the victim's pants and underwear at which point the victim told Manning they (victim) was going to scream. Manning told the victim if they did, his friend would come after her. The victim then laid on the floor and Manning used his mouth and fingers to touch the inside and outside of the victim's vagina. At some point Manning got on top of the victim and put his penis inside the victim's vagina.

The victim disclosed during the assault Manning made her look at him by choking her and pulling her hair. The victim stated RM walked in the room while Manning was "on top of" the victim. At this point RM began yelling at Manning and he ran out of the residence. The victim then ran and woke up KM and telling KM what had happened. KM walked out of the room and the victim began having a panic attack. RM then told Manning to take the victim to the hospital. The victim stated Manning then drove KM and the victim around for about 30 minutes prior to going to the hospital. While driving around Manning told KM that RM was stupid and nothing happened. Manning also told KM to tell hospital staff the victim woke them (KM) up having a panic attack.

Upon arrival at the hospital Manning sat next to the victim so they (victim) did not tell what actually happened. Once the victim was placed in a room the victim requested security and informed staff what had happened.

I later received reports from the Kansas City, MO Police Department Crime Laboratory stating semen had been recovered from inside the victim's vagina at the hospital and an unknown male genetic profile was developed from the DNA.

I requested Manning to respond to the Lee's Summit, MO Police Department regarding this case. Manning arrived with his attorney. Manning declined to be interviewed or to voluntarily provide a sample of his DNA.

I subsequently applied for and was granted a search warrant to collect a sample of Manning's DNA from The Honorable Judge Jeffrey Keal of the Jackson County, Missouri Circuit Court. Manning responded to the Lee's Summit, MO Police Department as requested. The warrant was served on 02-04-16 at the Lee's Summit, Missouri Police Department located at 10 NE Tudor Rd. Lee's Summit, Jackson County, Missouri 64086.

The collected samples were transported to the Kansas City, Missouri Crime Lab on 02-05-16 for comparison. On 02-29-16 I received a report from the Kansas City, Missouri Crime Lab with their conclusion. The conclusion by the examiner of the test was that Ricky W. Manning is the source of the semen from the cervical swabs collected from the victim. The report also stated the expected frequency of the genetic profile developed is one in 64 octillion unrelated individuals.

Det. Mark Wiley #0309  
Print Name (Detective)

 #0309  
Signature (Detective)

**THE COURT FINDS PROBABLE CAUSE.**

DATE

JUDGE