

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

<b>POLICE NO. :</b>	16-009000
<b>PROSECUTOR NO. :</b>	095437588

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>MARY P. COUTS</b>	)	
<b>628 NW Candlerree Dr.,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Blue Springs, MO - 64015</b>	)	<b>DIVISION</b>
<b>DOB: 11/02/1984</b>	)	
<b>Race/Sex: W/F;</b>	)	
<b>SSN: ██████████</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**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 November 27, 2016, in the County of Jackson, State of Missouri, John T. Rector was killed by being shot as a result of the perpetration of the class B felony of Burglary in the First Degree under Section 569.160, RSMo committed by the defendant on or about November 27, 2016, in the County of Jackson, State of Missouri.

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.

**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 Section 571.015.1, RSMo, in that on or about on or about November 27, 2016, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed

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the foregoing felony of burglary 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. Burglary 1st Degree (569.160-001Y19792299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about November 27, 2016, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at 28006 County Line Rd. and owned by John T Rector, for the purpose of committing stealing therein, and while in such a building there was present in such building, a person who was not a participant in the crime.

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/ Michael J. Hunt*  
Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO - 64050  
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State vs. Mary P. Coutts

[REDACTED]  
[REDACTED]  
DET Richard A. Berger , 3310 NE Rennau Drive, Lees Summit, MO - 64064

[REDACTED] - 64064-1703

DET Penny Cole , 3310 NE Rennau Drive, Lees Summit, MO - 64064

DEP Scott Collins , 3310 NE Rennau, Lees Summit, MO - 64064

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] -

DEP Chase Hager , 3310 NE Rennau, Lees Summit, MO - 64064

DEP Jessica Hill , 4001 NE Lakewood Way, Lees Summit, MO - 64064-1703

John R. Lane , 4900 Raytown Road, Kansas City, MO - 64130

SGT Ronda Montgomery , 3310 NE Rennau Drive, Lees Summit, MO - 64064

DEP Rodney Moyer , 3310 NE Rennau Drive, Lees Summit, MO - 64064

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**STATEMENT OF PROBABLE CAUSE**

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I, Detective Scott Collins #84/0388, of the Jackson County, Missouri Sheriff's Office, knowing that false statements on this form are punishable by law, state that the facts contained herein are true:

1. I have probable cause to believe that on 11-27-2016, at 28006 E County Line road, Pleasant Hill, Missouri, which is inside the boundaries of Jackson County, Missouri, **Mary P. Couts W/F 11-02-1984**, [REDACTED] last known address: 826 NW Candletree drive, Blue springs, MO, committed one or more criminal offense(s).
2. The facts supporting this belief are as follows:

On 11-27-16, at 0930 Hrs. Jackson County Sheriff Office Dep. R. Moyer was dispatched with Jackson County Sheriff Office Dep. C. Cole #38, to 28000 Howard Road, Lees Summit, Jackson County, MO in regard to a Burglary.

Upon arrival Moyer contacted the victim/reporting party, [REDACTED], [REDACTED], **D. W/F, 01-29-76**. [REDACTED] advised that on 11-27-16, at 0925 hours, she opened her garage door as she was going to take her children to Sunday school. After opening the door, she returned to the house to get her children and noticed that a white Kia SUV was parked directly in front of her house. [REDACTED] noticed a passenger in the vehicle as a white female in her 20's.

[REDACTED] thought the vehicle looked out of place and decided to return and check on her garage. When [REDACTED] returned to the garage, she saw a male suspect, who she described as tall 5 ft 10 or 11 and thin build, in her garage and when he saw her, ran to the white Kia carrying a light green Ryobi Circular saw, which had been in her garage.

[REDACTED] watched the vehicle head south from her address and park in front of an unfinished house; approximately 300 yards south of her address. [REDACTED] got into her vehicle and followed the white Kia to the unfinished address, recording the incident on her I-Phone, which chased the suspects away. [REDACTED] last saw the white Kia headed south on 7 Hwy from 128th St.

[REDACTED] provided the recording of the vehicle and suspect to the Jackson County Sheriff's Office. The video showed a white male, standing outside the driver's door of a white Kia. There was red transfer paint on the driver's side door and no hub caps on the driver's side wheels.

On November 27, 2016 at approximately 1144 hours, Deputies were dispatched to 28006 E. County Line Rd, in reference to an agency assist with EMS. Deputies upon arrival located the homeowner/victim, **Rector, John T W/M 11-29-1932**, lying in his back yard with apparent head trauma covered in blood. Rector was taken to Centerpoint hospital where he never regained consciousness and died as a result of his injuries on 12/08/2016.

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A friend of Rector and caretaker, ██████████ ██████████ W W/M 08-14-1959, had located Rector in the back yard and called the Sheriff's office. ██████████ advised Deputies that Rector's home had been ransacked and a 60" television was missing. ██████████ also advised that Rector had a silver brief case which contained financial documents including checks was missing.

On 12-02-2016, at 1000 hours, Det. Edwards and I responded to 32408 E County Line Road and contacted ██████████ ██████████ W/F 07-02-1981, who called the Jackson County Sheriff Office about information in regard to the TIPS hotline information that was sent out about the mentioned case.

██████████ advised me that on the evening of Wednesday, 11-30-2016, she was at home looking on Facebook, when she saw that someone shared a post that was sent out by the TIPS hotline, about information from anyone that may recognize the vehicle or individual in the pictures they posted. ██████████ said she noticed the white SUV and the clothing that the individual was wearing from the pictures, matched a vehicle and individual she witnessed on Sunday.

██████████ stated that on Sunday, 11-27-2016, at around 0930 hours, she and her son, ██████████, left their residence and was traveling west on County Line Road towards 7 highway to go to church. ██████████ stated that as she approached the residence at 28006 E County Line Road, she saw a smaller white SUV parked in the driveway facing south towards County Line Road. ██████████ stated she noticed the vehicle because she thought that house was abandoned, because she has never seen a vehicle or person at that residence or driveway before. ██████████ advised she saw a male in the driver's seat and he was wearing a flannel shirt.

On 12/16/2016 investigators at the Jackson County Sheriff's Office were contacted by United Missouri Bank and advised that one of Rector's stolen checks had been submitted for payment at the UMB bank located at 6400 Independence Ave.. Investigation determined that a Missouri temporary ID bearing Rector's name had been provided with the check to be cashed. The ID had been returned to the person by the bank at the time of the attempted transaction. A copy of the ID was provided to investigators and it was confirmed that the photo on the ID was not that of Rector.

From UMB surveillance footage we obtained the license plate that was on the vehicle that went through the drive thru attempting to cash a check of Rector's, MO registration LEIGH. A computer check of that license plate showed it was registered to ██████████ ██████████ W/F 01/02/1979, with an address of 11321 E. 39th Terr S., Independence, MO.

On 12-20-2016, members of the Jackson County Sheriff Office responded to 11321 E 39<sup>th</sup> terr south, where ██████████ was located.

On 12-20-2016, Det. T. Edwards interviewed ██████████ at the Jackson County Sheriff Office, where she was read her Miranda Rights and she agreed to speak with Det. T. Edwards. ██████████ stated she was contacted by ██████████ ██████████ W/M 11-29-1980, about Docman having some

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stolen checks and he needed a fake ID to cash them. [REDACTED] stated she made a fake MO paper driver's license for [REDACTED], with his picture and Rector's information on it, and in exchange [REDACTED] would give her a portion of money that the check would be cashed for. [REDACTED] stated she was leary that she wasn't going to get paid by [REDACTED] so she accompanied him to the UMB where she handled the transaction with the teller.

On 12/21/2016 Deputies with the Jackson County Sheriff's office conducted a pedestrian check on a person identified as [REDACTED] (w/m, 11/29/80) after he exited a 1997 Lincoln bearing Missouri license plate YH3-L8B. It was known to Deputies that [REDACTED] had outstanding warrants which they had confirmed. While [REDACTED] was being searched, incident to arrest, he was found to have a forged Missouri Driver's license on his person bearing the name of the homicide victim, John Rector, this ID was a perfect match for the one used in the attempt to cash the check at UMB.

On 12-23-2016 at 1039 hours, I conducted an interview with Docman, where he was read his Miranda Rights and he agreed to speak with me. Docman advised he was at a residence in Kansas City, MO, later identified to be 336 Elmwood, KCMO, where he got the checks from "Andrews". Further investigation revealed "Andrews" to be [REDACTED] [REDACTED] **M W/F 02-03-1983.**

On 01/06/2017 at 1427 hours, I located [REDACTED] at 847 Aztec, Independence, Jackson County, MO, and I transported her to the Jackson County Sheriff Office to be interviewed. Andrews was read her Miranda Rights and she agreed to speak with me.

I advised [REDACTED] I was conducting an investigation about some stolen checks and [REDACTED] thought about it for a few moments and stated she did have some checks about a month ago that said "Farm Account" on it, but could not remember the name on the checks. I mentioned the name "John Rector" and [REDACTED] immediately stated that was the name on the checks.

[REDACTED] stated she was at 336 Elmwood, Kansas City, Jackson County, MO, and advised that on one particular night, she could not remember the exact date, but it was after Thanksgiving sometime in the beginning of December, a female that she had never seen before came over to the house. The unknown female came to the residence to see the owner of the residence and she, the owner of the residence, and the unknown female were all in a bedroom and the female had a briefcase with her. [REDACTED] said the female opened up the briefcase and there were a lot of check in it and a lot of other personal information that she described to be some military paperwork and some paperwork about flying a plane. [REDACTED] said the unknown female laid all the paperwork out on the bed and there seemed to be a lot of personal information from someone.

[REDACTED] later contacted me and advised the unknown female was [REDACTED] [REDACTED] A computer check of that name revealed it to [REDACTED] [REDACTED] **W/F 08-08-1985.**

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On 02-01-2017, I contacted [REDACTED] by telephone and she agreed to meet with me and I met her at 1407 N Pleasant, Independence, Jackson County, MO, where she agreed to talk to me, and I transported her to the Jackson County Sheriff Office to be interviewed.

At 1237 hours, I read [REDACTED] her Miranda Rights and she stated she understood them and would speak with me. [REDACTED] stated she was at a house in the area of 23<sup>rd</sup> and Quincy in Kansas City, MO, around November/December 2016, when a male that she only knew as "Junebug" came in the residence with a silver briefcase and asked her if he could put something in her car and [REDACTED] told "Junebug" he could. [REDACTED] stated "Junebug" was with a girl she only knew as "Mary". [REDACTED] said she then left the residence some time later and received a phone call from "Junebug" stating "make sure that don't get in the wrong hands".

[REDACTED] stated she did not know what was in the briefcase, so she pulled over to see what was in the briefcase, and opened it and saw there to be paperwork in it. [REDACTED] said that the briefcase stayed in her vehicle until she moved into 336 Elmwood, Kansas City, MO, where the briefcase was placed in her room.

[REDACTED] advised that sometime later, she came home and the owner of the residence was in his room with a female she did not know (determined to be [REDACTED]) and they asked what the briefcase was and it was open and paperwork was spread out over the bed. Dailey stated she did not know about the contents of the briefcase and did not have anything to do with it past that point.

I showed [REDACTED] the pictures of the white male and white Kia, which were released to the media, and she identified the white male to be "Junebug". I questioned [REDACTED] as to how she knew that to be "Junebug" and she stated by the hat and clothes he was wearing. [REDACTED] also stated she had seen "Junebug" driving a vehicle similar to that in the pictures and "Mary" was with him in the white SUV.

Further investigation of the name of "Junebug", revealed it to be **Lane, John R W/M 06-16-1999**. It was also discovered "Mary" to be **Couts, Mary P W/F 11-02-1984**.

On 02-02-2017, it was discovered Lane was in custody at the Johnson County, MO, Sheriff Office detention facility on charges out of Raytown, MO Police department and he was being released on the same day and transferred back to the Raytown PD.

I responded to the Raytown Police Department and took custody of Lane, and transported him to the Jackson County Detention Center (JCDC), where Lane was placed on a 24 hour investigative hold at 1030 hours. It was also discovered, Couts was in custody at JCDC on charges out of KCPD. I contacted Couts and she agreed to respond back to the Jackson County Sheriff Office with me for questioning.

On 02-02-2017 at 1212 hours, I read Couts her Miranda Rights and she agreed to speak with me. I showed Couts the pictures that were released to the

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media and she stated the male was Lane and she did recognize the white car in the picture too, because the father of her children gave it to her to drive.

Couts stated that she and Lane were driving around one morning and saw a house that appeared to be abandoned (28006 E County Line road). Couts said they pulled into the driveway, and she got out of the car and opened the gate at the driveway and Lane drove the vehicle up the driveway. Couts said she walked up to the west side of the residence and saw lights on in the house and they walked to the rear of the house, north side, and was confronted by an older male (Rector). Couts said she told Rector she was looking for her dog that ran away and Rector told her he had not seen it, so she got back in the vehicle.

Once back in the vehicle, she told Lane what happened and he told her go back and get Rector in the house and tie him up. Couts said she recontacted Rector and asked to use his bathroom and he took her inside the residence and upstairs to the bathroom off his bedroom. Couts said that when she exited the bathroom, Rector asked her for sex and she walked by him and went back downstairs to the main level of the residence.

Couts said Rector followed her and she ended up securing him in a hallway in the main level of the residence, by leading him into the hallway and then closing a door once Rector was in the room, and putting some chairs in front of the door to keep Rector from opening it. Couts said she then told Lane what she did and they went back in the house and she cut a cord to the television that was mounted on the wall and they removed the television from the wall and placed it in the their vehicle. Couts said there was a briefcase on a couch in the front room where the television was, and Lane grabbed the briefcase, and she grabbed a jewelry box in the room to the south of where the television was, and then went back outside to the vehicle.

Couts said she was by the passenger door of the vehicle when she saw Rector exit the residence and then she saw Lane walk up behind Rector and hit him in the head. I asked what Lane hit Rector with and she stated she thought it was a wrench. Couts said Rector fell to the ground and she got in the vehicle and did not see anything further. Couts said that when Lane got in the vehicle, he put the wrench on the back floorboard and they left. Couts said that Lane took her to a house in Raytown, where she slept for a day and then got ahold of a friend, who picked her up and went to a house in the area of 23<sup>rd</sup> and Quincy in KCMO.

Couts said Lane showed up that day in the white Kia and then he left in another vehicle and they did not talk about the incident.

On 02-02-2017 at 1906 hours, I conducted an interview with Lane, where I read him his Miranda Rights and he agreed to talk to me. I first showed him a picture of Couts and he stated he knew her and he saw her do something that he wanted to talk about.

Lane stated that he had only knew Couts for a short time and one evening he stayed at her father's house in Blue Springs, MO with them. They woke up

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one morning and they decided to go drive around and look for stuff to steal. Lane said he thought they were somewhere around Pleasant Hill, MO, when they were driving around in a neighborhood and Coutts saw a garage door open and told him that she saw a tool bag in there and for him to go get it.

Lane said he was driving and stopped the vehicle in front of a house (28000 Howard, Lees Summit, MO), and went in the garage and grabbed a tool bag that had some hand tools, when a lady came opened a door to the garage and saw him, JACO Burglary report 16-08999. Lane said he ran back to the car and Coutts was in the driver's seat, so he got in the passenger seat and Coutts drove away. Lane said Coutts drove to a dead end, and he saw a female with a cell phone filming them, so he got out of the passenger seat of the car and got in the driver's seat and drove away.

Lane said Coutts told him that she knew where an abandoned house was, so she directed him where to drive. Lane said once they got to the house, Coutts opened the gate in the driveway and he drove through. Lane advised that Coutts told him to park behind the residence, and she got out of the vehicle and went in the house. Lane said after some time, Coutts called out to him she had locked Rector in a room and to help come get a television out of the house. Lane said he went with her into the house and helped her remove the television off of a wall and put it in the vehicle.

Lane said he went back into the house and was looking for stuff and found a jewelry box that he removed from the house and Coutts found a briefcase that she took out of the house. Lane stated Coutts also had a generator, which she put in the vehicle. Lane said he was in the living room and saw Rector outside and told Coutts, Rector was outside, and Coutts came up behind Rector and pushed him to the ground, and started hitting Rector in the head multiple times. I asked Lane what Coutts was hitting Rector with and he stated a plumber's (pipe) wrench. Lane said he was yelling at Coutts to stop hitting Rector and he grabbed her and threw her to the ground. Lane stated Rector was bleeding from the head and just lying on the ground.

Lane said he wanted to call for an ambulance, but Coutts would not let him and they drove away with him driving the vehicle. Lane said as they were driving away he told her he was going to call for help, but Coutts grabbed his cell phone and threw it out the window as they were driving down the highway.

Lane said a few weeks later, Coutts contacted him and wanted to give him some money for what was taken, and he met up with her and she gave him \$250. Lane stated sometime after that, he went to a house around 23<sup>rd</sup> and Quincy in KCMO, and when he saw the generator and briefcase. Lane said an individual asked about the briefcase and that individual gave him some drugs in exchange for the briefcase.

Lane stated that after the incident, he was watching television and saw the news release about the incident with the pictures that were released to the media of the white SUV and he recognized the person by the vehicle to be him and that eventually, he was going to be questioned as to what happened. I showed Lane the pictures that were released to the media and he confirmed

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those pictures were of him, and the pictures were of the same vehicle he and Coutts were driving around in on the day of the mentioned incident.

On 01-17-2017, I received the medical report from the Jackson County Medical Examiner for Rector. The report states the cause of death to be complications of head trauma and manner of death to be homicide.

*Det. Collins #84*

Detective Scott Collins #84/0388  
Jackson County, MO Sheriff's Office

**THE COURT FINDS PROBABLE CAUSE**

\_\_\_\_\_  
**DATE**

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**JUDGE**