IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI <u>AT KANSAS CITY</u>

POLICE NO	.: 18-001394
PROSECUTOR NO	.: 095445537
OCI	N:
STATE OF MISSOURI,)
,	AINTIFF,)
VS.)
)
JAROYNE D WRIGHT)
6101 W. 57th) CASE NO. 1816-CR
Shawnee Mission, KS 66202) DIVISION
DOB: 09/02/1992)
Race/Sex: B/M)
DEF	ENDANT.)

COMPLAINT

Count I. Sexual Conduct With Prisoner Or Offender By Probation/parole Officer/employee Of Jail, Prison, Correctional Facility (566.145-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 566.145, committed the class E felony of sexual conduct with a prisoner, punishable upon conviction under Sections 558.002 and 558.011, in that on or about April 29, 2018, in the Jackson County Detention Center, in the County of Jackson, State of Missouri, the defendant engaged in sexual conduct with Confidential Victim, who was a prisoner confined in the Jackson County Detention Center, by touching the vagina of Confidential Victim, for the purpose of arousing or gratifying the sexual desire of the defendant or Confidential Victim, and that at the time the defendant was assigned to work in the Jackson County Detention Center.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

State vs. Jaroyne D Wright

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/ Danielle Onions
Danielle Onions (#70467)
Assistant Prosecuting Attorney
415 East 12th Street, Floor 7M
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WITNESSES:

- 1. Lieutenant Johnathan Baldree, 1300 Cherry Street, Kansas City, MO 64106
- 2. Confidential Victim, Prosecuting Atty. Office, 415 E 12th St, Kansas City, MO 64106
- 3. Deputy Zach Gehring, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
- 4. Detective Jessica Hill, 4001 NE Lakewood Way, Lees Summit, MO 64064-1703
- 5. Lieutenant Christopher Wolfe, 1300 Cherry Street, Kansas City, MO 64106

JCSO CASE NO.: Probable Cause Statement.doc

- I, Detective Jessica N. Hill #79, 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:
 - I have probable cause to believe that on 04/29/2018, at 1300 Cherry 1. St, Kansas City, Missouri, which is inside the boundaries of Jackson County, Missouri, Jaroyne D. Wright, B/M, 09/02/1992, last known address: 6101 W. 57th St, Mission, KS, committed one or more criminal offense(s).
- The facts supporting this belief are as follows: On 05-11-2018, Deputies were dispatched to 1300 Cherry, Kansas City, MO (Jackson County Detention Center) in regard to a sex offense between a corrections officer and an inmate. Upon arrival contact was made with JCDC Lieutenants Christopher Wolfe and Johnathan Baldree. It was discovered while Lt. Wolfe and Lt. Baldree were watching video surveillance, on another investigation, there was possible inappropriate interaction between Correction Officer Jaroyne D. Wright B/M 09/02/1992, and inmate W/F Surveillance video revealed, on 04/29/2018, while Wright was working in Medical Housing, was in the cell located across from the desk, where Wright was sitting at. Wright and were observed writing multiple notes to each other throughout Wright's shift. The notes were later recovered from tell cell and were sexual in nature. At approximately 2011 hours, Wright is observed opening cell door. The door was slightly opened enough for Wright to put his arm inside the cell and give an unidentified object to Wright had his face in the door as well and it appeared they were talking to each other. was then observed reaching her arm/hand toward Wright and their bodies got closer together. A short time later Wright slightly broke away from the door with a smile on his face and looked in the direction toward the camera. In the audio of the surveillance you can hear Wright state "you're crazy" while he was smiling. He then went back to the same position of his arm and face being in the cell with the door slightly open. I is again, observed getting close to Wright and she reached toward him with her arm/hand. At that time Wright kept his left arm/hand inside the cell, where it appeared was close enough for him to be touching her with his hand, and looked toward the camera. Wright stayed in that position for a short time, then removed his arm/hand from the cell, backed away from the door, and Wright locked the cell. A short time later another C/O was observed walking into medical housing area. After observing these actions on surveillance Lt. Wolfe and Baldree opened an internal investigation, at which time Wright admitted to them he had sexual contact with the inmate. During a separate interview with Detective Hill Wright admitted to having sexual in nature conversations with via notes and in person. Wright advised he opened cell door to give her water and she grabbed his shirt, pulled him close, and grabbed his penis with her hand. Wright said then grabbed his hand and placed it on her bare vagina. Wright said at that time he did penetrate her vagina with two of his fingers.

When contact was made with she confirmed Wright "touched" her vagina.

Detective Jessica N. Hill #79/0407 Jackson County, MO Sheriff's Office