

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

Police #05-85840
Prosecutor #0993518
0716-CR
OCN# A5014192

COMPLAINT

THE STATE OF MISSOURI

vs.

William R. Watkins
3109 S. Linwood Avenue
Independence, MO 64055
DOB: 9/15/1954; Race/Sex: CAU/M;
SS# [REDACTED]
Defendant.

Count I. Child Molestation in the First Degree (2210799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William R. Watkins**, in violation of Section 566.067, RSMo, committed the **Class B Felony of Child Molestation in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that between and including the 18th day of October, 2004 and November 30, 2004, in the County of Jackson, State of Missouri, the defendant subjected R.L.B. (dob: 10/18/93), who was then less than fourteen years old to sexual contact to wit: Defendant placed his hand on R.L.B.'s (dob: 10/18/93) breast.

Count II. Statutory Sodomy in the First Degree (1109799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William R. Watkins**, in violation of 566.062, RSMo, committed the **Felony of Statutory Sodomy in the First Degree**, punishable upon conviction under Section 566.062, RSMo, in that between and including the 18th day of October, and November 30, 2004, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with R.L.B. (dob: 10/18/93), who was then less than twelve years old, to-wit: Defendant placed an object in R.L.B.'s (dob: 10/18/93) vagina.

Count III. Statutory Sodomy in the First Degree (1109799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William R. Watkins**, in violation of 566.062, RSMo, committed the **Felony of Statutory Sodomy in the First Degree**, punishable upon conviction under Section 566.062, RSMo, in that between and including the 18th day of October, 2004 and November 30, 2004, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with R.L.B. (dob: 10/18/93), who was then less than twelve years old, to-wit: Defendant placed an object in R.L.B.'s (dob: 10/18/93) anus.

Count IV. Statutory Sodomy in the First Degree (1109799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William R. Watkins**, in violation of 566.062, RSMo, committed the **Felony of Statutory Sodomy in the First Degree**, punishable upon conviction under Section 566.062, RSMo, in that between and including the 30th day of November, 2004 and November 30, 2007, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with C.M.M. (dob: 11/30/98), who was then less than twelve years old, to-wit: Defendant placed his hand in C.M.M.'s vagina.

Count V. Statutory Sodomy in the First Degree (1109799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William R. Watkins**, in violation of 566.062, RSMo, committed the **Felony of Statutory Sodomy in the First Degree**, punishable upon conviction under Section 566.062, RSMo, in that between and including the 30th day of November, 2006 and November 30, 2007, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with C.M.M. (dob: 11/30/98), who was then less than twelve years old, to-wit: Defendant had C.M.M. (dob: 11/30/98) place her hand on his penis.

Count VI. Statutory Sodomy in the First Degree (1109799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William R. Watkins**, in violation of 566.062, RSMo, committed the **Felony of Statutory Sodomy in the First Degree**, punishable upon conviction under Section 566.062, RSMo, in that between and including the 30th of November, 2006 and November 30, 2007, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with C.M.M. (dob: 11/30/98) who was then less than twelve years old, to-wit: Defendant placed his finger in C.M.M.'s (11/30/98) anus.

Count VII. Possession of Child Pornography (2502904.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, **William R. Watkins**, in violation of 573.037, RSMo, committed the **Class D Felony of Possession of Child Pornography**, punishable upon conviction under Sections (573.037, 558.011 and 560.011) (558.011 and 560.011), RSMo, in that on or about 20th day of December, 2005, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, possessed obscene material consisting of digital images that portray what appears to be a person under the age of fourteen years as a participant of sexual conduct.

STATEMENT OF PROBABLE CAUSE

Date: 12-21-07

Police #: 2007-114823

I, John F. Howe, a Detective with the Independence Police Department, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that William R. Watkins, W/M, 09-15-54, [REDACTED] committed one or more criminal offenses:
2. The facts supporting this belief are as follows:

On 08-23-05, at approximately 1230 hours, Independence, Missouri Police Department (IPD) Officer Romero was contacted by Jane Griffin with Children's Services at Sunnyvale Middle School, 3930 R D Mize Road in Blue Springs, Jackson County, Missouri and asked to sit in on an interview with a juvenile in reference to possible sexual abuse. Griffin identified the child to be interviewed as [REDACTED] W/F, 10-18-93, and said that Children's Services had received the hotline complaint from [REDACTED]'s foster parent. Officer Romero sat in on the interview while [REDACTED] disclosed that around September or October 2004, William Watkins had touched her private place. [REDACTED] stated that while at Watkins' residence in Independence, Missouri she consented to Watkins giving her a massage because she was tired from being at the haunted houses all night. [REDACTED] advised that Watkins had her lie down on the bed in his bedroom, where he proceeded to massage her legs with a purple in color hand massager, which she described as looking like a bubble and being approximately 8 inches long. [REDACTED] said that during the massage she feel asleep, but woke up sometime during the night to find that her underwear was pulled down around her thighs and her dress up to her hips. [REDACTED] stated that she could not recall where the suspect massaged her, but believed it was in her private area. [REDACTED] told Griffin that approximately one month prior to the interview a friend had touched her thigh by accident, which caused her to recall the incident. [REDACTED] had told a therapist, who had in turn called her foster parent [REDACTED] W/M, 01-19-74, who contacted Children's Services.

On 09-01-05, Kristin Gilgour, with the Child Protection Center, interviewed [REDACTED]. During the interview [REDACTED] told Gilgour that sometime after her birthday on October 18th and before December 2004, she had gone to Watkins' residence in Independence, Missouri to accompany him to the haunted houses. [REDACTED] stated that prior to leaving Watkins provided her with a pink thong to wear, an oversized bra, which he stuffed with socks, in an attempt to make her look "more attractive". [REDACTED] said that while they were on their way down to the "Beast" haunted house, Watkins squeezed the sock in her bra and also touched her breasts and asked her "if they knew they would just be playing around that night".

[REDACTED] advised that after they returned to Watkins residence from being at the haunted houses, Watkins put warm oil on her and massaged her with a massager that looked like a ladybug. During the interview [REDACTED] drew a picture of the massager, which matched what was observed in Watkins' residence during the execution of a search warrant on 12-20-07. [REDACTED] stated that Watkins also massaged her with a "purple thing shaped like a penis" inside and

outside her anus and inside and outside her vagina. It is believed that this item was recovered during the search warrant on Watkins' residence on 12-20-07. [REDACTED] stated that she fell asleep and when she woke up the final time, Watkins was rubbing the purple thing inside her vagina, but quickly put the purple thing away when he realized she was asleep.

[REDACTED] advised that this incident occurred when she was 11 years old; after her 11th birthday on October 18th and before December, 2004.

On 12-17-07, Independence, Missouri Police Officer Lane was dispatched to the front desk of the Independence Police Department in reference to a possible sex offense. Officer Lane met with [REDACTED] W/F, 01-26-63, who said that she was the foster parent of [REDACTED] W/F, 11-30-98. [REDACTED] stated that [REDACTED] has been in her care for approximately six months, and that approximately 7-10 days prior to this report, [REDACTED] told her that while she was living with her biological mother, [REDACTED], she had been sexually touched by her friend's mother, "Bill". [REDACTED] advised that [REDACTED] told her that she had been touched by Bill both under and over her clothing in her pelvic area. [REDACTED] also told her that she had been made to take a bath with a 12 year old boy, and that Bill had made her sleep in the same bed as him (Bill). [REDACTED] also said that Bill had photographed her and put them on the computer "so everyone can see".

[REDACTED] told Officer Lane that she had taken [REDACTED] to see a therapist, at which time [REDACTED] provided the therapist with the same accounts of the incident. [REDACTED] stated that the incident occurred at 13910 E. Noland Court in Independence, Jackson County, Missouri. Officer Lane ran a computer inquiry on 13910 E. Noland Court through IPD Dispatch, and dispatch located the name Bill Watkins, W/M, 09-15-54. Independence Police Department report #07-114823 was taken regarding the possible offense.

Detective Howe conducted a computer inquiry on Watkins through the Independence Utility System and found that Watkins had utilities connected up at 3109 S. Linwood. At approximately 0758 hours, Detectives Howe and Fowler drove by the residence 3109 S. Linwood in Independence, Missouri and observed a white with blue stripes, 1991, Chevy conversion van bearing Missouri license 542 LWN parked in the driveway directly in front of the front door of the residence. The detectives observed a "For Sale" sign in the back window of the van that displayed the phone number (816) 252-5774. Detective Howe called the phone number, and the phone call was answered by a male voice who stated, "Prime Cuts". Detective Howe acted interested in the van, and arranged to see the van. The male subject, who was believed to be Watkins, provided Detective Howe with the address 3109 S. Linwood in Independence, Missouri and said that he would be there all day and that customers would start showing up at 10:00 AM.

Detective Howe later ran the phone number through anywho.com and found that the phone number was registered to Prime Cuts Choice Hairstyling in Independence, Missouri. No street address was listed.

At approximately 1035 hours, Detectives Howe and Fowler responded to English Landing Grade School, 6500 NW Klammer, Kansas City, Clay County, Missouri and

conducted an interview with [REDACTED]. Detective Howe had previously spoken with [REDACTED] and arranged to speak with [REDACTED] at school. [REDACTED] advised that she would not be available to attend the interview, but called the school counselor, Rachel Fullerton, (816) 359-6266, and arranged for Fullerton to sit in on the interview. [REDACTED] consented for the detectives to interview [REDACTED] with out her present. Detectives Howe and Fowler then conducted a short interview with [REDACTED] with Fullerton present. During the interview [REDACTED] told the detectives that just prior to Halloween 2006, she had been at Bill's house and Bill had touched her "front private area" while they were in his bedroom. [REDACTED] also said that Bill made her touch his private area, and said that she felt his skin there. [REDACTED] told the detectives that Bill had also provided her with an outfit to wear, which she described as being a "hoochie" skirt that she said was really short, as well as a top, pantyhose, Cheetah girl underwear, and big shoes. [REDACTED] stated that Bill had her change into this clothing in his bedroom, and then took her down to the basement to a small room and photographed her in those clothes. [REDACTED] advised that after he photographed her, Bill showed her pictures on his computer near the kitchen of children around her age that were only wearing their underwear. [REDACTED] stated that Bill also showed her one picture on the computer of a girl around her age, who did not have pants on and was showing her "pee pee" to the camera. [REDACTED] told the detectives that Bill drives a blue and white van, and that he has small bricks on the front of his house.

Detective Howe found this information to be consistent with the description of the house, and the blue and white van that was parked in the driveway. [REDACTED] told the detectives about a couple of other children who Bill had photographed, and said that Bill told them that they were modeling photos. [REDACTED] said that Bill also told her not to tell anyone. [REDACTED] described the camera that Bill used to take her pictures as possibly being gray, and believed that he had then printed some of the pictures he had taken on his computer. [REDACTED] stated that she has had numerous contacts with Bill, and knew Bill prior to him touching her.

A search warrant was obtained for the residence on 12-20-07, specifically looking for child pornography and the purple object described in the affidavit. On 12-20-07, at approximately 1646 hours, the search warrant was executed upon the residence, and Watkins was taken into custody. Watkins was transported to the Independence, Missouri Police Department, where he was placed on a 24-hour investigative hold. The residence was searched in accordance with the search warrant, and children's clothing, specifically young girls clothing was found in two dresser drawers in the northeast bedroom. This bedroom was identified as being where Watkins slept and kept his personal items. One of the articles of clothing was a black girl's short skirt that matched the description that [REDACTED] had previously given the detectives.

In the bathroom in this same bedroom, Detective Howe located a cabinet that contained a clear plastic bag that contained a white crystalline substance, which Detective Howe recognized through his training and experience to be Methamphetamine, a Schedule II Controlled Substance. There was also a bag containing a green leafy substance, which Detective Howe recognized through his training and experience to be Marijuana, a Schedule I controlled substance, as well as an assortment of drug paraphernalia.

Detective Howe also located numerous VHS tapes, DVD's, and Hi8 videotapes in the northeast bedroom, which could possibly contain child pornography or evidence of the exploitation of children.

Detective Fowler also conducted a preview of the computer located in the dining room, which was a Compaq, Presario, computer tower, serial #CNX74220WJ, with Knoppix preview software. The preview revealed numerous images of child pornography as defined in Missouri state statute on the computer hard drive. Some of the images depicted pre pubescent children engaged in sex acts with adults, such as the juvenile depicted in the photograph performing oral sex on adult males and having vaginal intercourse with adult males, and other images depicted pre pubescent children in bondage situations.

Detective Howe obtained a piggy back search warrant, which was authorized by Judge Roldan, and the additional items that were not covered in the first search warrant were recovered as evidence.

On 12-21-07, at approximately 0830hours, Julie Done'lon, with the Child Protection Center, conducted an interview with [REDACTED]. During the interview [REDACTED] stated that last year when she was 8 years old and in first grade she had slept in bed with Watkins. [REDACTED] advised that while she was in bed with Watkins, Watkins rubbed her vagina from outside her clothes, and then went under her clothes and rubbed the outside and inside of her vagina with his hand and fingers. [REDACTED] stated that Watkins then took her hand and put it on his penis and caused her hand to squeeze it, and then he rubbed the outside and inside of her anus with his hands and fingers. [REDACTED] advised that Watkins then began touching the outside and inside of her vagina with his hands and fingers again, and then the outside and inside of her anus again. [REDACTED] stated that Watkins last put her hand back on his penis and caused her hand to squeeze it. They then went to sleep. [REDACTED] then told Done'lon that on a prior occasion her and her cousin; [REDACTED] had spent the night with Watkins at his residence and slept in his bed. While they were in his bed Watkins pulled out a battery operated "long blue thing" and massaged up and down both of her legs and then her vagina on the outside of her clothing. [REDACTED] stated that Watkins also massaged [REDACTED]'s legs, but did not know if he touched her anywhere else.

John Howe
Print Name (Detective)
Detective
Independence Police Department

[Signature]
Signature (Detective)

Based upon: State of Missouri v. William R. Watkins

THE COURT FINDS PROBABLE CAUSE:

Date

Judge