

STATE OF MISSOURI VS Clemons, Reginald Byron		
DIV #:	CA#: 510677656	CAUSE#:
DESTINATION: GRAND JURY (AT LARGE)		2016 JAN 25 PM 12:35
DEFENDANT INFORMATION		
ADDRESS: 11593 State Highway O Mineral Point, MO 63660		
PEDIGREE: RACE: B SEX: M	DOB: 08/30/1971 AGE: 44	HGT: 6'00" WGT: 165
ID #s:	COMPLAINT#: SLMPD 910050328	LID: 000234658
ARREST#:	DIST:	OCN:
ALIASES:		
SSNs: [REDACTED]		

STATE OF MISSOURI)
CITY OF ST. LOUIS)^{SS}

COMPLAINT

The Circuit Attorney of the City of St. Louis, State of Missouri, upon information and belief, charges that

Count 1: Forcible Rape Or Attempted Forcible Rape With A Weapon Or Physical Injury Or Sex With More Than One Person (Class A FELONY) RSMo 566.030 (SCC 566.030-996Y198011)
ON 4/5/1991 Place: Chain of Rocks Bridge

The defendant, in violation of Section 566.030, RSMo., acting with Marlin Gray, Antonio Richardson, and Daniel Winfrey, committed the class A felony of forcible rape, punishable upon conviction under Section 558.011, RSMo., in that on or about April 5, 1991, in the City of St. Louis, State of Missouri the defendant, acting with Marlin Gray, Antonio Richardson, and Daniel Winfrey, had sexual intercourse with R.K. without the consent of R.K. by the use of forcible compulsion and subjected R.K. to sexual intercourse with more than one person.

Count 2: Forcible Rape Or Attempted Forcible Rape With A Weapon Or Physical Injury Or Sex With More Than One Person (Class A FELONY) RSMo 566.030 (SCC 566.030-996Y198011)
ON 4/5/1991 Place: Chain of Rocks Bridge

The defendant, in violation of Section 566.030, RSMo., acting with Marlin Gray, Antonio Richardson, and Daniel Winfrey, committed the class A felony of forcible rape, punishable upon conviction under Section 558.011, RSMo., in that on or about April 5, 1991, in the City of St. Louis, State of Missouri the defendant, acting with Marlin Gray, Antonio Richardson, and Daniel Winfrey, had sexual intercourse with J.K. without the consent of J.K. by the use of forcible compulsion and subjected J.K. to sexual intercourse with more than one person.

Count 3: Robbery 1st Degree(Class A FELONY) RSMo 569.020
of Rocks Bridge

ON 4/5/1991 Place: Chain
(SCC 569.020-001Y197912)

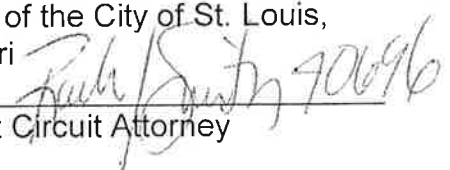
The defendant, in violation of Section 569.020, RSMo, acting with Marlin Gray, Antonio Richardson, and Daniel Winfrey, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about April 5, 1991, in the City of St. Louis, State of Missouri, the defendant, acting with Marlin Gray, Antonio Richardson, and Daniel Winfrey, forcibly stole a watch in the possession of Thomas Cummins, and in the course thereof Marlin Gray, another participant in the crime, threatened the immediate use of a dangerous instrument against Thomas Cummins.

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 Circuit Attorney prays that an arrest warrant be issued as provided by law.

Jennifer M. Joyce
Circuit Attorney of the City of St. Louis,
State of Missouri

By _____
Assistant Circuit Attorney



2016 JAN 25 PM 12:35

PROBABLE CAUSE STATEMENT

DATE: January 22, 2016

2016 JAN 25 PM 1:35

I, Joseph Brauer, 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 Reginald Byron Clemons, a Black Male DOB: 8/30/71 Age: 44, committed one or more criminal offense(s).

Count 1: Forcible Rape/atmpt Rape W/ Weapon (Class A FELONY) RSMo 566.030
ON 4/5/1991 Place: Chain of Rocks Bridge (SCC 566.030-996Y198011)

Count 2: Forcible Rape/atmpt Rape W/ Weapon (Class A FELONY) RSMo 566.030
ON 4/5/1991 Place: Chain of Rocks Bridge (SCC 566.030-996Y198011)

Count 3: Robbery 1st Degree(Class A FELONY) RSMo 569.020
ON 4/5/1991 Place: Chain of Rocks Bridge (SCC 569.020-001Y197912)

2. The facts supporting this belief are as follows: I was informed that in the early morning hours of April 5, 1991, the Defendant, Marlin Gray, Antonio Richardson, and Daniel Winfrey (the "group of four") approached R.K., J.K., and Thomas Cummins on the Chain of Rocks Bridge. Marlin Gray announced a robbery and insisted he had a gun. Cummins was forced to lay face down, during which the group of four took turns threatening, standing over, and sitting on Cummins.

While Cummins was forced to lay face-down, Cummins heard the group of four taking turns having sexual intercourse with R.K. and J.K. against their wills. Cummins heard the men make multiple threats against R.K. and J.K. and heard the girls sobbing. At some point, Defendant took Cummins' watch. The Defendant then asked Cummins how it made Cummins feel to know that Defendant had just raped Cummins' girlfriend. Cummins was later forced down a manhole on the bridge, where he saw R.K. and J.K. laying naked, side-by-side. Cummins was directed to lie next to them. One of the group of four proceeded to have sexual intercourse with R.K. against her will, while J.K. attempted to console R.K. One of the group of four then pushed J.K. and R.K. off the bridge and gave Cummins the option of jumping or getting shot. Cummins jumped. All three tried to swim the Mississippi. Neither R.K. nor J.K. made it out of the water alive.

A flashlight found at the scene led officers to Antonio Richardson, who gave a detailed account of the rapes, robbery and murders. Richardson also provided police with the identities of the other participants. Police thereafter arrested and questioned the other participants. The Defendant and Daniel Winfrey admitted to being on the bridge during the attacks on R.K. and J.K., as well as to various aspects of the rapes, robbery and murders.

During the investigation, a woman came forward and gave police the watch belonging to Cummins that had been taken. Police discovered that Gray had been in possession of the watch and attempted to hide it.

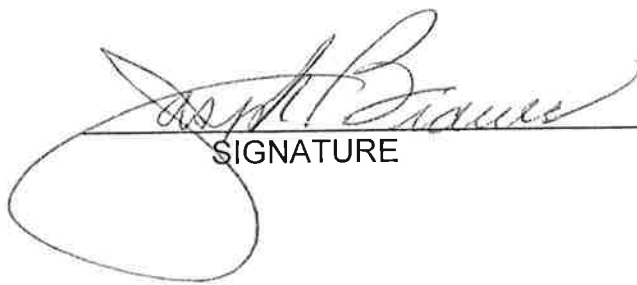
Evidence technician officers recovered a used condom from the scene, as well as the pants and boxer shorts worn by Gray at the time of the incident. Initial testing indicated the presence of two sperm heads from the condom. Based on the technology available at the time, the specimen was insufficient for DNA comparisons.

In 2011, current DNA testing technology was used to analyze the used condom and Gray's clothing from the date of the incident. Multiple DNA profiles were found. One DNA profile was located on the used condom and determined to be consistent with R.K. and J.K., with a 99.9% probability. From a mixture of

DNA located on Gray's clothing, at least three DNA profiles were located - one DNA profile was consistent with Marlin Gray (rarity of profile 1 in 5.938 quadrillion individuals in the African American population); one DNA profile was consistent with R.K. and J.K. (99.9% probability); and one DNA profile was consistent with the Defendant (rarity of profile is 1 in 16,690 individuals in the African American population). Cummins' DNA was not found on any samples.

Joseph Brauer

PRINT NAME



SIGNATURE

2015 JAN 25 PM 12:35