



# Western Missouri Cyber Crimes Task Force

## Statement of Probable Cause

Date: 01-10-2017

Complaint Number: 02-16-328

I, Detective Scott Childers of the Western Missouri Cyber Crimes Task Force, a sworn Law Enforcement Officer for the state of Missouri, knowing that false statements on this form are punishable by law, and that the facts contained herein are true, states as follows:

1. I have probable cause to believe that between the dates of 10-01-1997 until 05-23-1998, Matthew C. Lindsey W/M 11/23/1968 at 508 Crispin Street, Richmond, Ray County, Missouri, 64085 committed one or more criminal offense(s):  
Statutory Rape-RSMO 566.034

2. The facts supporting this belief are as follows:

On 10-27-2016 at approximately 1634 hours, I Detective Childers conducted an interview with victim ██████ W/F ██████

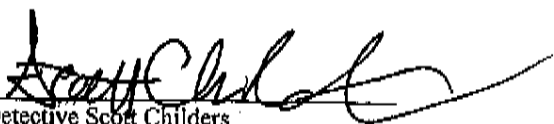
██████ attended Richmond High School by her maiden name as ██████ and graduated Richmond High School in 1999. ██████ attended all four years at Richmond High School. During this time, she met Richmond High School Vice Principal and Basketball Coach Matthew Lindsey. ██████ was a basketball cheerleader and got to know Defendant Lindsey by sitting next to him on the bus transporting the basketball team to and from games.

██████ stated she and Defendant Lindsey were involved in a sexual relationship while she was sixteen years old. The relationship started her junior year around the month of October 1997 and ended before she graduated in May of 1999. They had approximately twenty sexual encounters which involved vaginal intercourse. Most of the sexual encounters took place at Lindsey's home located at 508 Crispin Street in Richmond and several times at the Lexington Inn Hotel located at 1078 N Outer Road, Lexington, Lafayette County, Missouri 64067.

██████ advised Defendant Lindsey would buy her gifts and give her money. The relationship became sexual after Lindsey asked ██████ if she did "deliveries" while ██████ was working at Pizza Hut. On her seventeenth birthday Defendant Lindsey gave her money in which she bought a dress. ██████ vividly remembers the relationship was sexual before her seventeenth birthday and buying the dress. ██████ advised her friend

and classmate ██████ W/F ██████ who attended Richmond High School by her maiden name ██████ was aware of the relationship and could support her statements.

On 11-16-2016 at 0956 hours, I Detective Scott Childers conducted an interview with ██████ who graduated Richmond High School in 1999 and attended all four years of High School at Richmond. ██████ advised she gave ██████ rides to Lindsey's home located on the corner of Crispin and Ralph Street in Richmond. She can remember at least two times in which she drove ██████ to the residence. ██████ would drop ██████ off down the street and ██████ would walk to the house because Lindsey did not want ██████ vehicle parked outside of the house. ██████ could not remember the exact dates but is certain she and ██████ were sixteen because ██████ was pregnant at the time and did not give birth to her child until four days after she turned seventeen.

  
Detective Scott Childers  
Western Missouri Cyber Crimes Task Force

Detective Scott Childers #8174

10<sup>th</sup> day of January 2017.

IN THE CIRCUIT COURT OF RAY COUNTY MISSOURI  
DIVISION IV

STATE OF MISSOURI

Plaintiff,

v.

MATTHEW C. LINDSEY  
36006 E. Truman Rd.  
Oak Grove, MO 64075  
d.o.b. 11/23/68

Defendant.

Case No. 17RY-CR00021

**AFFIDAVIT OF COMPLAINT**

Camille A. Johnston, Prosecuting Attorney of the County of Ray, State of Missouri, being duly sworn, upon oath, states that the defendant,

**COUNT I**

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 between October 1, 1997 and May 23, 1998, in the County of Ray, State of Missouri, the defendant had sexual intercourse with A.N.W. and at that time A.N.W. was less than seventeen years old and the defendant was twenty-one years of age or older.

Charge Code: 566.034-001Y19951116.0

NCIC Code: 16

**COUNT II**

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 between October 1, 1997 and May 23, 1998, in the County of Ray, State of Missouri, the defendant had sexual intercourse with A.N.W. and at that time A.N.W. was less than seventeen years old and the defendant was twenty-one years of age or older.

Charge Code: 566.034-001Y19951116.0

NCIC Code: 16

**RANGE OF PUNISHMENT:**

**Class C FELONY:**

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years of not less than 2 years and not to exceed seven (7) 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 five thousand dollars (\$5,000); or by both imprisonment and a fine.

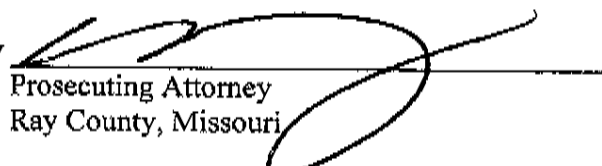
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Camille A. Johnston, Prosecuting Attorney of the County of Ray, State of Missouri, being duly sworn, upon oath says that the facts stated in the above complaint are true, according to her best information, knowledge and belief.

Wherefore, the Prosecuting Attorney prays that a warrant be issued as provided by law.

By

  
Prosecuting Attorney  
Ray County, Missouri