

AFFIDAVIT AND COMPLAINT IN FELONY CASE

STATE OF MISSOURI )

NO. 10CY-CR00664

COUNTY OF CLAY )

Div. 7

IN THE CIRCUIT COURT OF CLAY COUNTY, MISSOURI  
ASSOCIATE DIVISION

THE STATE OF MISSOURI,

vs.

Plaintiff )

Dorothy M Cascone

W/F

08/07/1951 )

Kansas City, MO 64118 )

Defendant. )

PA No. 047290630

Stephanie N Steele, Assistant Prosecuting Attorney, Clay County, Missouri,  
being duly sworn, charges that the defendant,

COUNT: 1

Charge Code: 1302099.0

In violation of Section 565.850, RSMo, committed the class-B felony of assault in  
the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or  
about July 5, 2010, in the County of Clay, State of Missouri, the defendant hired a person  
to shoot George Cascone, and such conduct was a substantial step toward the commission  
of the crime of attempting to kill George Cascone, and was done for the purpose of  
committing such assault.

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 concerning this matter, which statement(s) are made a part  
hereof and are submitted herewith as a basis upon which this court may find the existence  
of probable cause for issuance of the warrant.

Affiant further states that the facts set forth in said complaint are true, according  
to his best information, knowledge and belief.

  
Assistant Prosecuting Attorney

Subscribed and sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_\_.

\_\_\_\_\_  
Division Clerk

Witnesses:

AGT Leona Ramana, Federal Bureau of Investigation, 1300 Summit, Kansas City, MO  
64105

Bond Set:



PROBABLE CAUSE STATEMENT FORM

Date: July 6, 2010

Report Number: 166C-KC-93405

I, Special Agent Leana Ramana, FBI

*(Name and identity law enforcement officer, or person having information as to probable cause.)*

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 July 5, 2010, at [REDACTED] in

*(Date)*

*(Address)*

Kansas City, Clay County, Missouri, Dorothy Cascone

*(City)*

*(Name of Offender(s))*

White female, DOB 8/7/1951, SSAN [REDACTED] committed one or more criminal offense(s).

*(Description of Identity)*

RSMO 565.050 Assault in the First Degree-Attempt to Kill

2. The facts supporting this belief are as follows:

1. I am a Special Agent (SA) of the Kansas City Office of the Federal Bureau of Investigation (FBI) and have been so employed since October 2006. Prior to becoming an agent, I was an Assistant State's Attorney in Chicago, Cook County, Illinois, for approximately two and a half year. I am currently assigned to the Violent Crimes Task Force (VCTF) of the Kansas City Office of the FBI and as such conduct investigations involving bank robberies, kidnappings and murder for hire.

2. This is an affidavit in support of Complaint and Arrest Warrant for Dorothy Cascone, Date of Birth August 7, 1951, and in violation of RSMO 565.050 Assault in the first degree - attempt to kill. The following facts are based upon information obtained personally, by other FBI Agents, other police officers and police reports.

3. On July 4, 2010, the Kansas City Division of the FBI was contacted by a Cooperating Witness (CW) regarding a potential solicitation for murder. The CW provided that Dorothy Cascone (Cascone) had approached the CW and asked the CW to kill her ex-husband, George Cascone. These conversations occurred at Cascone's residence, [REDACTED] Kansas City, Clay County, Missouri. Cascone wanted the CW to shoot

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George Cascone in his own home, while he was sleeping. Cascone indicated that she initially wanted it to happen at midnight on July 5, 2010 because the fireworks and other guns would be going off. The CW told Cascone that the killing could not happen on that date.

4. On July 5, 2010, the CW met with your Affiant and Special Agent (SA) Benjamin Kinsey of the FBI. The CW informed that he/she told Cascone that he/she was meeting with "Frank" a potential partner to commit the murder. Cascone provided the CW with a .38 caliber weapon that was loaded. Cascone told the CW that she wanted a silencer put on the weapon. "Frank" was suppose to be able to provide the silencer. The CW brought three handwritten maps of George Cascone's residence. The residence is located at \_\_\_\_\_ Kansas City, Clay County, Missouri. The maps depicted the varying levels of the residence, to include where ~~George slept, where a female companion of George slept, doors and windows, a where a possible safe was~~ located. Cascone drew the maps for the CW, informing the CW how to get into the house and where George would be sleeping. Cascone also told the CW to get the safe, and also to recover a .45 caliber weapon that was in George's residence that belonged to Cascone. Cascone told the CW that George takes a lot of medication before going to sleep and that once he is asleep, he is a sound sleeper.

The CW stated that upon returning to the residence after meeting with "Frank", the CW and Cascone were to go to K-Mart to buy black shoes, pants and a shirt for the murder. The CW also drove your Affiant and SA Kinsey by George's residence, \_\_\_\_\_, Kansas City, Clay County, Missouri, stating that Cascone had driven the CW there the day before and that the CW had walked up to the back of the residence. The CW was then released to return to Cascone's residence.

5. On July 5, 2010, your Affiant and SA Kinsey observed the CW arrive at K-Mart 600 Northeast Barry Road, Kansas City, Clay County, Missouri, with Dorothy Cascone. The CW and Cascone shopped in the

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K-Mart, leaving with a pair of shoes, black pants with a gray stripe, a black t-shirt, bread and two types of medication. Cascone paid for the items.

6. On July 5, 2010, your Affiant, Detective Daneff, Kansas City, Missouri, Police Department (KCMOPD) and SA Kinsey met with the CW for the purposes of making a recorded phone call. Detective Daneff and the CW called Cascone on her telephone. Cascone requested that the CW return to the home in order to further discuss the murder. The CW had told Cascone that the CW was meeting with "Frank" and that "Frank" needed further information. Prior to the CW leaving law enforcement officers, both the CW and the CW's vehicle was searched for currency, firearms and narcotics, all with negative results. This brief phone call was recorded.

~~7. On July 5, 2010, law enforcement officers with KCMOPD and FBI observed the CW arrive at~~  
Dorothy Cascone's residence, [REDACTED] Kansas City, Missouri, in her black Cadillac. The CW was the sole occupant of the vehicle. The CW was equipped with a recording device. The CW exited the vehicle and entered the residence. Shortly thereafter, the CW returned to the vehicle with Cascone. Cascone then drove the CW to the Shell Gas Station at N. Oak Trafficway and Barry Road, Kansas City, Missouri. Surveillance observed the CW exit the vehicle and stand outside of the gas station until he met with Det. Daneff. Upon meeting with Det. Daneff, the CW provided \$1000 United States Currency, a loaded .25 caliber handgun, three handwritten maps of George's residence and a photograph of George Cascone that Cascone had given the CW. The CW also provided Detective Daneff with the recording device that was used in taping the conversation.

8. On July 5, 2010, subsequent to the CW meeting with Det. Daneff, the CW provided the following information:

a. The CW arrived at Cascone's residence and entered the home. Upon entering the residence the CW met with Cascone. The CW told Cascone that "Frank" had some questions. The CW asks if they

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should go through the back door or the window (referencing the map that Cascone had drawn) "Frank" wanted to know how she wanted it done. For example, the CW asked, "Do you want him (George) shot once, three times, or a bunch of times?" to which Cascone replied, in summary, that she did not want it to be a bloody mess, that "I just want him dead". The CW also stated that "Frank" wanted to know what to do with the bodies (on several occasions Cascone refers to female(s) that also stay in George's residence, the recording depicts Cascone also talking about killing any females in the house), to which Cascone replied, in summary, that she just assumed that the bodies would be left at the residence. The CW stated that "Frank" wanted to know what time George went to bed and if George slept with a gun. The CW stated that "Frank" trusts the CW to get the second \$1000 tomorrow, to which Cascone replies, "That's not a problem". Cascone provides \$1000 to the CW to give to "Frank" stating that the money, "is right here."

When speaking about the safe in George's residence, Cascone tells the CW not to get greedy and if they need to get the hell out of there, then "get the hell out of there." While Cascone drove the CW to the Shell Gas Station, Cascone asks the CW if the CW brought the clothes. The CW responded no, but that the CW would come back to the house and get them.

b. The recording device was downloaded and placed on a compact disc. Review of the conversation recorded provided consistent information with that the CW relayed to Detective Danoff.

9. On July 5, 2010, the CW indicated that during the day after returning from K-Mart, Cascone had sewn the black pants so that the gray stripe was not visible and the pants were all black. Cascone was also going to sew black socks onto the black t-shirt so that it had long sleeves. The CW stated that upon leaving the residence the black shoes, black pants and black t-shirt were left in [REDACTED], Kansas City, Missouri. Cascone also left the house briefly, telling the CW that she was going to State Farm to pay the premiums on the life insurance policies that she has on George Cascone.

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10. Dorothy Cascone was placed into custody by KCMOPD officers subsequent to a traffic stop in her driveway. The residence was locked and secured.

11. On July 5, 2010, your Affiant and Detective Craig Horalek, KCMOPD, interviewed Dorothy Cascone at KCMOPD Headquarters, 1125 Locust, Kansas City, Missouri. After being advised of the identities of the interviewing officers and the nature of the investigation, as well as being advised her *Miranda* Rights and Cascone signing a waiver of those rights. Cascone provided the following information:

a. Cascone did draw three maps of George's residence and provided them to her 3 week boyfriend, [REDACTED] (phonetic). [REDACTED] was talking about killing George and the maps were to inform [REDACTED] of the layout, where George was located, another female was located and a possible safe in the home. ~~Cascone drove [REDACTED] by the house the previous day to show him where it was located.~~ Cascone acknowledged driving to K-Mart with [REDACTED] and buying pants, a t-shirt and shoes. Cascone paid for the items, however, she stated that [REDACTED] was to pay her back. Cascone knew the clothing items would be for [REDACTED] to kill George. Cascone acknowledged that she has four life insurance policies on George Cascone, whom she has been divorced from for approximately 11 years. On July 5, 2010, Cascone went to State Farm in order to pay two months premium on one of the policies, as it was going to expire on July 8, 2010, and she did not want that to happen because she would not get paid if George was dead. Cascone knew about a "Frank" that [REDACTED] was talking to about helping kill George. Cascone knew that [REDACTED] had two firearms of hers, although she stated that [REDACTED] "took" them, but that she did not give them to him. Cascone repeatedly denied wanting George dead and initially indicated that the two had a cordial relationship and amicable divorce.

b. Cascone stated that every man she dates wants to kill George, and that there are a lot of people who want George dead. Initially, Cascone denied ever stating that she wanted George dead, but that it was all [REDACTED]'s idea and pushing. When confronted with making the statement that she did not care how the

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murder occurred, but that she just wanted George dead, Cascone would not answer whether or not she made that comment. Upon further questioning, Cascone indicated that she made the statement, but that it was because she was mad. When asked what she was mad about, since she had been stating she was not mad at him, Cascone spoke about the money, property and businesses that George got in the divorce settlement. Cascone continuously denied actually wanting George dead, stating that she did not really think that [redacted] would do it. She often referred to everything as a "game". When asked if she really wanted the .45-caliber gun back from inside the residence, Cascone stated that she did. When asked that she must have really thought they were going to be in the house if she requested that, Cascone did not have a response.

Cascone stated that she did give [redacted] \$1000 that she knew was going to be given to "Frank" to help with the murder. However, her explanation for giving [redacted] the money was that she owed [redacted] money for helping with household chores. A review of the recorded conversation proves inconsistent with her explanation.

Printed Name: Leena Luoma

Signature: Leena Luoma SA-PBI