

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

<b>POLICE NO. :</b>	21-033917
<b>PROSECUTOR NO. :</b>	095464917
<b>OCN:</b>	qo005922

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>ROBERT C COWAN JR.</b>	)	
<b>17301 E. 51st St. Ct. S.</b>	)	<b>CASE NO. 2116-CR</b>
<b>Independence, MO 64055</b>	)	<b>DIVISION</b>
<b>DOB: 09/01/1969</b>	)	
<b>Race/Sex: W/M</b>	)	
<b>████████████████████</b>	)	
	)	<b>DEFENDANT.</b>

**AMENDED COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Patronizing Prostitution - > 14 Yrs < 18 Yrs (567.030-003Y20204099.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class E felony of patronizing prostitution, punishable upon conviction under Sections 567.030 and 558.011, RSMo, in that on or about May 27, 2021, in the County of Jackson, State of Missouri, the defendant, agreed to give something of value, namely U.S. currency to another person, peace officer Chad Cox, acting as ██████., with the understanding that such person or another person will engage in sexual conduct, by having sex, with any person.

The range 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 one (1) year 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.

**Count II. Furnishing Pornographic Material Or Attempt To Furnish To A Minor**  
**(573.040-002Y20203799.0)**

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The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class A misdemeanor of furnishing pornographic materials to minors, punishable upon conviction under Sections 573.040 and 558.011, RSMo, in that on or about May 27, 2021, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, transferred material pornographic for minors consisting of a video of Defendant masturbating by way of electronic transfer to ■■■■■, a person under the age of eighteen years, known by the defendant to be a person under the age of eighteen years.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

**Count III. Furnishing Pornographic Material Or Attempt To Furnish To A Minor  
(573.040-002Y20203799.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class A misdemeanor of furnishing pornographic materials to minors, punishable upon conviction under Sections 573.040 and 558.011, RSMo, in that on or about May 27, 2021, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, transferred material pornographic for minors consisting of a video of Defendant masturbating by way of electronic transfer to ■■■■■, a person under the age of eighteen years, known by the defendant to be a person under the age of eighteen years.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

**Count IV. Furnishing Pornographic Material Or Attempt To Furnish To A Minor  
(573.040-002Y20203799.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class A misdemeanor of furnishing pornographic materials to minors, punishable upon conviction under Sections 573.040 and 558.011, RSMo, in that on or about May 27, 2021, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, transferred material pornographic for minors consisting of a video of a female masturbating by way of electronic transfer to ■■■■■, a person under the age of

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eighteen years, known by the defendant to be a person under the age of eighteen years.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

**Count V. Furnishing Pornographic Material Or Attempt To Furnish To A Minor  
(573.040-002Y20203799.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class A misdemeanor of furnishing pornographic materials to minors, punishable upon conviction under Sections 573.040 and 558.011, RSMo, in that on or about May 27, 2021, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, transferred material pornographic for minors consisting of a photo of Defendant's male genitalia by way of electronic transfer to [REDACTED], a person under the age of eighteen years, known by the defendant to be a person under the age of eighteen years.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

**Count VI. Furnishing Pornographic Material Or Attempt To Furnish To A Minor  
(573.040-002Y20203799.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class A misdemeanor of furnishing pornographic materials to minors, punishable upon conviction under Sections 573.040 and 558.011, RSMo, in that on or about May 27, 2021, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, transferred material pornographic for minors consisting of a photo of Defendant's male genitalia by way of electronic transfer to [REDACTED], a person under the age of eighteen years, known by the defendant to be a person under the age of eighteen years.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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

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double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

**Count VII. Furnishing Pornographic Material Or Attempt To Furnish To A Minor  
(573.040-002Y20203799.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class A misdemeanor of furnishing pornographic materials to minors, punishable upon conviction under Sections 573.040 and 558.011, RSMo, in that on or about May 27, 2021, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, transferred material pornographic for minors consisting of a photo of Defendant's male genitalia by way of electronic transfer to [REDACTED], a person under the age of eighteen years, known by the defendant to be a person under the age of eighteen years.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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/ Kent Stejskal*  
Kent Stejskal (#70456)  
Assistant Prosecuting Attorney  
321 W Lexington Ave  
Independence, MO 64050  
kstejskal@jacksongovl.org

**WITNESSES:**

1. DET Jason Clancy, 223 N. Memorial Drive, Independence, MO 64050
2. DET Chad Cox, 223 N. Memorial Drive, Independence, MO 64050
3. [REDACTED]

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4.



## PROBABLE CAUSE STATEMENT

Date: 6/15/2021

Report #: 21-33917

I, Chad Cox, a Detective with the Independence, Missouri, Police Department, 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 5/27/2021, at 1200 hours, Robert C Cowan Jr, (Race- White, Sex- Male, DOB- 09/01/1969, Address-17301 E. 51<sup>st</sup> St Ct S. Independence, MO 64055, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 05/27/21 I was contacted by Officer Jeff Nunn about a possible sex offense at Hardee's (4011 S. Noland Rd).

Officer Nunn advised that he was contacted by a former student [REDACTED] who stated that he and his girlfriend, [REDACTED] (victim 09/15/04), were approached by Robert Cowan (suspect) while at Hardee's. Cowan offered them both a job for his company. The victim would be the secretary and [REDACTED] would be his driver. During the conversation they told Cowan that the victim was only 16 years old and wanted to know if that would be okay. Cowan stated that it was.

[REDACTED] later contacted Cowan about the job and Cowan stated that they could make extra money and that he was willing to pay the victim \$500 for nude pictures. [REDACTED] declined and reminded Cowan that she was only 16 years old. [REDACTED] stated that he has some text messages from Cowan that he would email to me. I told him not to respond to any of Cowan's text until I have those message and I told him not to tell Cowan that he contacted the police.

[REDACTED] also stated that Cowan told him that his last secretary sent him nude photos for money. [REDACTED] did not know how old she was. I asked the victim if I could assume her identity and reach out to Cowan and see if he asked for photos or sex. She agreed.

I contacted Cowan at phone number 816-[REDACTED] from a text now number of 816-430-3514. During our conversation he talked about me being young and not to set him up because he has a good lawyer. He told me that he would give me \$300 and go up to \$700 a week for nude pictures of me. He also stated that he would pay more money for a video. Cowan then started to ask me sexual questions. He told me that he would not ask to have sex until I was older.

He later sent me pictures of his penis and two videos of him masturbating. In the second video Cowan ejaculated. In the video Cowan was wearing black shorts with lime green on them. In the pictures and videos you could see a white recliner, a maroon pillow with a design on it, a lamp next to the couch that he is laying on and a stone fireplace. There is also a rug in front of the recliner. Cowan later sent a picture where he was in a vehicle wearing a black t shirt, gold chain with a pennant, black sunglasses and a baseball style hat.

Cowan sent me a video of a female ejaculating and asked if I was able to do this. Cowan also asked me about how I masturbate and how often I have sex. Later in the conversation he asked me about having sex with me and told me that he thinks my "cum" taste good. He talked about wanting to lick my vagina and several other sexual questions. At some point in the conversation, I referenced being 16 years old but Cowan did not respond to my age.

I later told him that I wanted to have sex with a 16 year old friend of mine and we had been discussing it for a while. He offered to pay her to have a three some with us. During the conversation he asked for oral sex and I told him that he would need to shave his penis before I did that. He stated that he would shave his penis before I came over. He is expecting me and my friend to come over to have sex on 06/14/21.

During the conversation Cowan asked for oral sex. I told him that I would not put his penis in my mouth unless he shaved it. He told me that he would have it shaved before we met to have sex. Cowan advised that he could not meet up until 1700 hours. He advised that he wanted to meet at Quik Trip on Noland Rd by Hardees. He would then bring me to his house to have sex. I tried to get Cowan to meet me earlier but would not. While serving the search warrant, Cowans wife stated that she had to be at work at 1700 hours and was going to be late.

While the SWAT team was making entry at 17301 E. 51<sup>st</sup> St Ct S. Cowan answered the door and dropped a cell phone on the stairs next to him. After getting the search warrant for his phone I saw that he was typing a text message to me (who had assumed the victim's identity) but had not sent it yet.

While standing outside the house, Cowan told his wife that he had been talking to a girl and that is why we were at the house. On 06/15/21 I attempted to interview Cowan but he asked for a lawyer.

Det. Chad Cox 1475

/s/Det. Chad Cox 1475

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Print Name

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Signature