

CIRCUIT COURT OF JACKSON COUNTY, MO
BY  DCA

The range punishment for a class D 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 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 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. Forgery (570.090-001Y20202589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090.1(4), RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 7, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine, an Abandoned Property Report Form 4669, knowing that it had been made so that it purported to have a genuineness that it did not possess.

The range punishment for a class D 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 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 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 III. Harassment - 1st Degree (565.090-003Y20205309.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.090, RSMo, committed the class E felony of harassment in the first degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about April 7, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, without good cause, engaged in an act with the purpose to cause emotional distress to [REDACTED] by prohibiting [REDACTED] from gathering her personal belongings from her vehicle, and such act did cause [REDACTED] suffer emotional distress.

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 IV. Stealing - Motor Vehicle/Watercraft/Aircraft (570.030-038Y20202404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about January 31, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, appropriated a 2015 Nissan Altima, a a motor vehicle, which property was owned by [REDACTED], and the defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive her thereof.

The range punishment for a class D 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 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 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 V. Forgery (570.090-001Y20202589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090.1(4), RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 31, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine, an Abandoned Property Report Form 4669, knowing that it had been made so that it purported to have a genuineness that it did not possess.

The range punishment for a class D 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 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 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 VI. Stealing - Motor Vehicle/Watercraft/Aircraft (570.030-038Y20202404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 1, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, appropriated 2015 Chevrolet Malibu, a motor vehicle, which property was owned by [REDACTED], and the defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive him thereof.

The range punishment for a class D 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 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 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 VII. Forgery (570.090-001Y20202589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090.1(4), RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 1, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine, an Abandoned Property Report Form 4669, knowing that it had been made so that it purported to have a genuineness that it did not possess.

The range punishment for a class D 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 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 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 VIII. Stealing - Motor Vehicle/Watercraft/Aircraft (570.030-038Y20202404.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 1, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, appropriated a 2008 Buick Lucerne, a a motor vehicle, which property was owned by [REDACTED], and the defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive her thereof.

The range punishment for a class D 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 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 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 IX. Forgery (570.090-001Y20202589.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.090.1(4), RSMo, committed the class D felony of forgery, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 1, 2025, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, with the purpose to defraud, transferred with the knowledge or belief that it would be used as genuine, an Abandoned Property Report Form 4669, knowing that it had been made so that it purported to have a genuineness that it did not possess.

The range punishment for a class D 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 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 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.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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.

MELESA N. JOHNSON

Prosecuting Attorney

Jackson County, Missouri

by,

/s/ Patrick J. Browne

Patrick J. Browne (#74293)

Assistant Prosecuting Attorney

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WITNESSES:

The State's witnesses as of 4/10/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.