



IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

POLICE NO. :	KC24082504
PROSECUTOR NO. :	095482423
OCN:	

STATE OF MISSOURI,)
PLAINTIFF,)

vs.)

JOHN R. THIBEAUX II)

[REDACTED])

KANSAS CITY, MO 64132) CASE NO. 2516-CR

DOB: [REDACTED]) DIVISION 1

Race/Sex: B/M)

S.S.N.: [REDACTED])

AND)

JOHN R. THIBEAUX)

[REDACTED])

Kansas City, MO 64138)

DOB: [REDACTED])

Race/Sex: B/M)

S.S.N.: [REDACTED])

DEFENDANTS.)

COMPLAINT
WARRANT REQUESTED

Count I. Involuntary Manslaughter 1st Degree (565.024-001Y20200999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.024, RSMo., committed the **class C felony of involuntary manslaughter in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo., in that on or about November 2, 2024, in the County of Jackson, State of Missouri, the defendants, John R. Thibeaux II and John R. Thibeaux, either acting alone or purposefully in concert with another, recklessly caused the death of [REDACTED] by owning or harboring dogs, known by the defendants to be aggressive, and failing to adequately control said dogs.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not

to exceed ten (10) years; 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. Assault - 2nd Degree (565.052-001Y20201399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo., committed the **class D felony of assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo., in that on or about November 2, 2024, in the County of Jackson, State of Missouri, the defendants, John R. Thibeaux II and John R. Thibeaux, either acting alone or purposefully in concert with another, recklessly caused serious physical injury to [REDACTED] by owning or harboring dogs, known by the defendants to be aggressive, and failing to adequately control said dogs.

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/ Claire E. Wyatt
Claire E. Wyatt (#74083)
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State vs. John R. Thibeaux II, Case No.

WITNESSES:

The State's witnesses as of 4/15/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.