

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

DIVISION 25

25-Apr-2025 14:24

CIRCUIT COURT OF JACKSON COUNTY, MO

BY DCA

POLICE NO. : KC25002398

PROSECUTOR NO. : 095483850

OCN:

STATE OF MISSOURI,

PLAINTIFF,

vs.

KAVEON C. COTTONHAM

12005 SMALLEY AVE

GANDVIEW, MO 64030

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

CASE NO. 2516-CR

DIVISION

DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant knowingly, or with the purpose of causing serious physical injury, caused the death of [REDACTED] by shooting him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

Count II. Armed Criminal Action (571.015-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count I, all allegations of which are incorporated herein by reference.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo, is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years.

Count III. Unlawful Possession Of A Firearm (571.070-004Y20245212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class C felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Glock 10mm, a firearm, and on June 8, 2017, the defendant was convicted of the felony of Involuntary Manslaughter in the First Degree in the 16th Circuit Court of Jackson County, Missouri.

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 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.

Defendant is a prior and persistent offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment under Sections 558.016 and 557.036, RSMo, in that defendant has been found guilty of two or more felonies committed at different times. The felonies are as follows:

3. On or about August 26, 2016, the defendant was found guilty of Burglary in the First Degree in the 16th Circuit Court of Jackson County, Missouri, for events that occurred on June 14, 2015, and
4. On or about November 8, 2023, the defendant was found guilty of Delivery or Possession of a Controlled Substance in the 14th Circuit Court of Randolph County, Missouri, for events that occurred on March 5, 2020.

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.

State vs. Kaveon C. Cottonham, Case No.

MELESA N. JOHNSON

Prosecuting Attorney

Jackson County, Missouri

by,

/s/ Devon Tarantino

Devon Tarantino (#72156)

Assistant Prosecuting Attorney

415 E. 12th Street

Kansas City, MO 64106

(816) 881-4618

dtarantino@jacksongov.org

WITNESSES:

The State's witnesses as of 4/25/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.