

2516-CR-2025 16:04

CIRCUIT COURT OF JACKSON COUNTY, MO

BY  DCA**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY****POLICE NO. :** KC24083399**PROSECUTOR NO. :** 095483858**OCN:** 1I001482**STATE OF MISSOURI,****PLAINTIFF,****vs.****HOANG VU LE****AKA VU HOANG LE****408 Park Ave****Kansas City, MO 64124****DOB:** [REDACTED]**Race/Sex:** A/M**S.S.N.:** [REDACTED]**CASE NO. 2516-CR****DIVISION****DEFENDANT.****COMPLAINT**
WARRANT REQUESTED**Count I. Burglary - 2nd Degree (569.170-001Y20202205.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about November 6, 2024, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED] and possessed by [REDACTED], for the purpose of committing stealing therein.

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. Property Damage 1st Degree (569.100-001Y20202901.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the **class E felony of property damage in the first degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 6, 2024, in the County of Jackson, State of Missouri, the defendant knowingly damaged the front window, which property was possessed by [REDACTED] by throwing a rock through the front window, and the damages to such property exceeded seven hundred and fifty dollars.

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 III. Stealing (570.030-043Y20202308.0)

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 A misdemeanor of stealing**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about November 6, 2024, in the County of Jackson, State of Missouri, the defendant appropriated U.S. Currency, of a value of at least one hundred fifty dollars, which property was in the possession of [REDACTED], and defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof.

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. Attempted Burglary - 2nd Degree (569.170-001Y20202203.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class E felony of attempted burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about November 6, 2024, in the County of Jackson, State of Missouri, the defendant threw a rock three times at a window, and such conduct was a substantial step toward the commission of the crime of burglary in the second degree of the building at [REDACTED], and was done for the purpose of committing such burglary in the second degree.

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.

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/ Julia A. Hamilton

Julia A. Hamilton (#45429)

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WITNESSES:

The State's witnesses as of 6/12/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.