

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

POLICE NO. :	KC25039164
PROSECUTOR NO. :	095485497
OCN:	

**FILED
DIVISION 25
31-Jul-2025 11:25**

CIRCUIT COURT OF JACKSON COUNTY, MO
BY DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

HAJJI J MCDONALD III

7525 E 55th St

Kansas City, MO 64129

DOB:

Race/Sex: B/M

S.S.N.:

DEFENDANT.

CASE NO. 2516-CR

DIVISION

**COMPLAINT
WARRANT REQUESTED**

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted
Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y20200999.0)**

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 June 22, 2025, in the County of Jackson, State of Missouri, [REDACTED] was killed by being shot as a result of the attempted perpetration of the class D felony of stealing under Section 570.030.5, RSMo, committed by the defendant on or about June 22, 2025, in the County of Jackson, State of Missouri.

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. Attempted Stealing - Physically Take (570.030-036Y20202399.1)

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 E felony of attempted stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 22, 2025, in the County of Jackson, State of Missouri, the defendant, acting in concert with another, physically struggled with [REDACTED], and such conduct was a substantial step toward the commission of the offense of stealing from [REDACTED], and was done for the purpose of committing such stealing.

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 seven (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/ Jamie K. Hunt

Jamie K. Hunt (#50401)

Assistant Prosecuting Attorney

415 E. 12th Street

Floor 7M

Kansas City, MO 64106

(816) 881-4622

jhunt@jacksongov.org

WITNESSES:

The State's witnesses as of 7/30/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.