

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. : TF250043ME

PROSECUTOR NO. : 095486511

OCN:

FILED
DIVISION 33

19-Sep-2025 17:34

CIRCUIT COURT OF JACKSON COUNTY, MO

BY Jerry S. Bush DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

DEWAYNE C. CLARKE

15200 Grand Summit Blvd Apt. 101

Grandview, MO 64030

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2516-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Trafficking Drugs - 2nd Degree (579.068-002Y20203599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.068, RSMo, committed the class B felony of trafficking in the second degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed more than 450 grams or more of a mixture or substance containing a detectable amount of coca leaves, cocaine salts, or cocaine base, a controlled substance, knowing of its precense and nature.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

Count II. Deliver Controlled Substance Except 35 Grams or Less of Marijuana or Synthetic Cannabinoid (579.020-004Y20223599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 6, 2025, in the County of Jackson, State of Missouri, the defendant knowingly sold cocaine, a controlled substance, to a confidential informant, knowing that it was a controlled substance.

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.

Count III. Deliver Controlled Substance Except 35 Grams or Less of Marijuana or Synthetic Cannabinoid (579.020-004Y20223599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 21, 2025, in the County of Jackson, State of Missouri, the defendant knowingly sold cocaine, a controlled substance, to a confidential informant, knowing that it was a controlled substance.

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.

Count IV. Deliver Controlled Substance Except 35 Grams or Less of Marijuana or Synthetic Cannabinoid (579.020-004Y20223599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 26, 2025, in the County of Jackson, State of Missouri, the defendant knowingly sold cocaine, a controlled substance, to a confidential informant, knowing that it was a controlled substance.

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.

Count V. Deliver Controlled Substance Except 35 Grams or Less of Marijuana or Synthetic Cannabinoid (579.020-004Y20223599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 3, 2025, in the County of Jackson, State of Missouri, the defendant knowingly sold cocaine, a controlled substance, to a confidential informant, knowing that it was a controlled substance.

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.

Count VI. Deliver Controlled Substance Except 35 Grams or Less of Marijuana or Synthetic Cannabinoid (579.020-004Y20223599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 17, 2025, in the County of Jackson, State of Missouri, the defendant knowingly sold cocaine, a controlled substance, to a confidential informant, knowing that it was a controlled substance.

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.

Count VII. 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 September 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Kel Tac AR style 223 handgun, a firearm, and on December 12, 2015, the defendant was convicted of the felony of possession of a controlled substance in the 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

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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/ Joseph R Marquez

Joseph R Marquez (#75289)
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WITNESSES:

The State's witnesses as of 9/19/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.