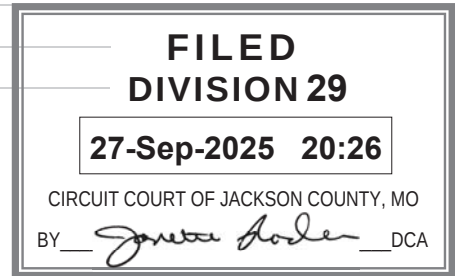


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC25059750
PROSECUTOR NO. :	095486619
OCN:	1I009428



STATE OF MISSOURI,)
)
) **PLAINTIFF,**)
)
 vs.)
)
)
)
 DIANNA A BROWN)
 918 E 9TH ST)
 KANSAS CITY, MO 64106)
 DOB: [REDACTED])
 Race/Sex: B/F)
 S.S.N.: [REDACTED])
)
) **DEFENDANT.**)

**CASE NO. 2516-CR
DIVISION**

**COMPLAINT
WARRANT REQUESTED**

Count I. Murder 2nd Degree (565.021-001Y20200912.0)

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 between September 13, 2025 and September 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to [REDACTED] caused the death of [REDACTED] by striking him with a blunt object.

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 between September 13, 2025 and September 19, 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, and the defendant committed the foregoing felony of Murder in the Second Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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. Arson - 2nd Degree (569.050-001Y20202006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.050, RSMo, committed the class D felony of arson 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 damaged a building located at [REDACTED] Kansas City, Jackson County, Missouri, owned by [REDACTED] and defendant did so by starting a fire.

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 IV. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y20205006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the class E felony of tampering with physical evidence, 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 destroyed trace evidence with the purpose to impair its availability in an official investigation, and such investigation was for the felony of murder 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/ Stephanie R. Sang
Stephanie R. Sang (#68370)
Assistant Prosecuting Attorney
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Kansas City, MO 64106
(816) 881-3519
SRSang@jacksongov.org

WITNESSES:

The State's witnesses as of 9/27/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.