

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	19-015241
PROSECUTOR NO. :	095451247
OCN:	an019204

STATE OF MISSOURI,

PLAINTIFF,)

VS.

MEGHANN N. WELLS

1367 S. Baker Dr.

Latham, MO 65050

DOB: 11/13/1988

Race/Sex: W/F

DEFENDANT.)

COMPLAINT

Count I. Possession Of Child Pornography - 2nd/subsequent Offense Or Possess More Than 20 Pictures/one Film/videotape (573.037-001Y20083799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or between January 1, 2018 and December 31, 2018, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of masturbation and the child pornography consisted of a moving image.

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. Statutory Sodomy - 2nd Degree (566.064-001Y20171199.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.064, RSMo, committed the class D felony of statutory sodomy in the second degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or between August 1, 2018 and December 31, 2018, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, knowingly had deviate sexual intercourse with Confidential Victim by Confidential Victim's finger penetrating the defendant's genitalia, and at that time Confidential Victim was less than seventeen years of age and the defendant was twenty-one years of age or older.

The range of 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 two (2) years 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 III. Unlawful Use Of Weapon - Subsection 10 - Carries Loaded Weapon Into School, Bus, Premises, Function (571.030-017Y20175299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030.1(10), RSMo, committed the **class E felony of unlawful use of a weapon** on a school premises, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about February 28, 2019, in the County of Jackson, State of Missouri, the defendant knowingly carried a loaded firearm, a weapon readily capable of lethal use into a school.

Notwithstanding any other provision of law, no person who pleads guilty to or is found guilty of a felony violation of Section 571.030.1, RSMo, shall receive a suspended imposition of sentence if such person has previously received a suspended imposition of sentence for any other firearms or weapons-related felony offense.

The range of 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 two (2) years 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 IV. Furnishing Pornographic Material Or Attempt To Furnish To A Minor
(573.040-002Y19873705.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.040, committed the class A misdemeanor of furnishing pornographic materials to minors, punishable upon conviction under Sections 573.040, 558.011, and 560.016, RSMo, in that on or between January 1, 2018 and December 31, 2018, in the County of Jackson, State of Missouri, the defendant, knowing its content and character, disseminated material pornographic for minors consisting of the defendant penetrating her vagina with a toy, to Confidential Victim, a person under the age of eighteen years, knowing or in reckless disregard of the likelihood that the person was under the age of eighteen years.

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).

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kelly Collins
Kelly Collins (#68006)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3288
kmcollins@jacksongov.org

State vs. Meghann N. Wells

WITNESSES:

1. PO Robb Barker, 223 N. Memorial Drive, Independence, MO 64050
2. Confidential Victim, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Jaime Harraman, 223 N. Memorial Drive, Independence, MO 64050
4. DET Emily Knox, 223 N. Memorial Drive, Independence, MO 64050
5. DET John Roach, 223 N. Memorial Drive, Independence, MO 64050
6. PO Matthew Shull, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 3/1/2019

Report #: 2019-15241

I, John Roach, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that in December of 2018, at 1367 S. Baker Drive, Independence, Jackson County Missouri, 64050, Meghann N. Wells, (Race: White, Sex: Female, DOB: 11-13-1988, Address: 1367 S. Baker Drive, Independence, Jackson County Missouri, 64050, [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 02-28-2019, the Reporting Party ("RP") made contact with Officer Brayer in regards to sexual activity between the Confidential Victim (born in 2002, currently under 17 years of age) and Defendant Wells. The RP advised he/she had received information that Defendant Wells and the Confidential Victim had been sending inappropriate text messages between each other. The RP stated he/she talked with the Confidential Victim who disclosed Defendant Wells had performed oral sex on the Confidential Victim and the Confidential Victim had digitally penetrated Defendant Wells' vagina.

On 02-28-19, the Confidential Victim was taken to the Child Protection Center for a forensic interview. During the interview, the Confidential Victim disclosed sending and receiving sexually explicit photos and videos with Defendant Wells. The Confidential Victim also advised while at Defendant Wells' residence, Defendant Wells placed her mouth on the Confidential Victim's genitals and performed oral sex on the Confidential Victim. The Confidential Victim disclosed that the Confidential Victim penetrated Defendant Wells' vagina with the Confidential Victim's finger. The Confidential Victim disclosed that the Confidential Victim first went to Defendant Wells' apartment at the beginning of the 2018-2019 school year and the sexual contact with Defendant Wells occurred in 2018.

On 02-28-19, Officer Barker, a School Resource Officer with the Independence Police Department, made contact with Defendant Wells at Van Horn High School. Defendant Wells and her property, a black purse, black backpack, and black computer bag, were escorted from the school to the Independence Police Department for a formal interview. Defendant Wells was transported from Van Horn High School to the Independence Police Department by Officer Barker.

Defendant Wells was escorted to a 3rd Floor Interview room at the Independence Police Department. Prior to the interview Defendant Wells was read and signed the Miranda Warning of Rights form. Defendant Wells was interviewed by Detective Knox and Detective Roach with the Independence Police Department.

During the interview, Defendant Wells stated she and the Confidential Victim began to "sext" each other starting in the Spring of 2018. She admitted to exchanging sexually explicit text

messages with the Confidential Victim. Defendant Wells admitted to also exchanging both sexual pictures and videos with the Confidential Victim. She stated she took and sent approximately 15 videos of herself which depicted her breasts as well as her penetrating her vagina with a “toy.” Defendant Wells admitted to receiving videos from the Confidential Victim that depicted the Confidential Victim masturbating.

Defendant Wells admitted to having her vagina penetrated by the Confidential Victim. She stated the incident occurred at her residence in December of 2018. Defendant Wells stated she and the Confidential Victim were on her couch and the Confidential Victim penetrated her genitals with the Confidential Victim’s finger. She denied she had performed oral sex on the Confidential Victim.

Defendant Wells was escorted to the Independence Detention Unit where she was placed on a 24 hour hold for Statutory Sodomy. A search incident to arrest of Defendant Wells’ property found a Glock 43 .9mm handgun (SN: BHVW547) with six rounds in the magazine. The firearm was located in Defendant Wells’ purse. Defendant Wells had the firearm in her possession while at Van Horn High School. The handgun was recovered as evidence and placed in police property.

Detective John Roach

/S/ Detective J. Roach

Print Name

Signature