

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	23-001433
PROSECUTOR NO. :	095473949
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
MICHAEL A DEBLOIS)	
15609 E. US 24 Highway Apt. C)	CASE NO. 2316-CR01323
Independence, MO - 64050)	DIVISION
DOB: 08/19/1980)	
Race/Sex: W/M)	
████████████████████)	
)	DEFENDANT.

AMENDED COMPLAINT

Count I. Tampering With A Judicial Officer (575.095-001Y20205099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.095, RSMo, committed the **class D felony of tampering with a judicial officer**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or between March 27, 2023, and March 28, 2023, in the County of Jackson, State of Missouri, the defendant, with the purpose to harass, intimidate or influence a judicial officer, namely ██████, in the performance of his official duties, engaged in conduct reasonably calculated to harass or alarm ██████. by repeatedly calling and leaving numerous voicemails on ██████'s office phone line of an angry and threatening nature.

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.

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Count II. Harassment Motivated By Discrimination To Frighten Or Disturb Another Person (557.035-007Y20205399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Sections 557.035 and 565.090, RSMo, committed the **class D felony of harassment in the first degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or between March 27, 2023, and March 28, 2023, in the County of Jackson, State of Missouri, the defendant without good cause, engaged in acts with the purpose to frighten, disturb, or cause emotional distress to [REDACTED]. by repeatedly calling and leaving numerous voicemails on [REDACTED]'s office phone line of an angry and threatening nature, and such acts did cause [REDACTED] to be frightened, disturbed, or suffer emotional distress, and the defendant was knowingly motivated to engage in such acts because of the race of [REDACTED].

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.

The facts that form the basis for this information and belief are contained in the previously filed statement(s) of facts, incorporated herein and submitted as a basis upon which this court may find the existence of probable cause.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kent Stejskal
Kent Stejskal (#70456)
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WITNESSES:

1. DET Jarrel D. Berryman, 4001 NE Lakewood Ct., Lee's Summit, MO 64064
2. K.G., *See Prosecutor's Office*
3. A.S., *See Prosecutor's Office*