

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

POLICE NO. :	KC25002340
PROSECUTOR NO. :	095482507
OCN:	1I002825

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 STEVE COLEMAN)
)
 6607 E 110TH TER) CASE NO. 2516-CR
)
 Kansas City, MO 66104) DIVISION
)
 DOB: [REDACTED])
)
 Race/Sex: B/M)
)
 S.S.N.: [REDACTED])
)
 DEFENDANT.)

COMPLAINT
WARRANT REQUESTED

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y20201304.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the class A felony assault in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to **REDACTED** by shooting **REDACTED** in the head, and in the course thereof defendant inflicted serious physical injury on **REDACTED**.

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 (571.015-001Y20205213.0)

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 about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), RSMo, committed the **class A felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about January 14, 2025, at **REDACTED**, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at another person or persons and, as a result of the above described conduct, **REDACTED** suffered injury or death.

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 IV. Armed Criminal Action (571.015-001Y20205213.0)

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 about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon by, with and through, the knowing use, assistance and aid of a deadly weapon.

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 V. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y20201006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class B felony of kidnapping in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about January 14, 2025, defendant unlawfully confined **REDACTED** for a substantial period, without **REDACTED**'s consent as the result of forcible compulsion, for the purpose of terrorizing or inflicting physical injury on **REDACTED**.

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 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 VI. Armed Criminal Action (571.015-001Y20205212.0)

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 about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of kidnapping charged in Count 5, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of kidnapping by, with and through, the knowing use, assistance and aid of a deadly weapon.

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 VII. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y20201006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the **class B felony of kidnapping in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about January 14, 2025, defendant unlawfully confined ANTHONY HARRIS for a substantial period, without **REDACTED** 's consent as the result of forcible consent for the purpose of terrorizing **REDACTED** . 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 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 VIII. Armed Criminal Action (571.015-001Y20205212.0)

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 about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of kidnapping charged in Count 7, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of kidnapping by, with and through, the knowing use, assistance and aid of a deadly weapon.

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 IX. Unlawful Possession Of A Firearm - Dangerous Felon/Prior Conviction (571.070-003Y20245212.0)

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 B felony of unlawful possession of a firearm**, punishable under Section 558.011, RSMo, in that on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a Glock 43, a firearm, and on November 12, 2010, the defendant was convicted of the felony of robbery in the first degree, a dangerous felony as defined in Section 556.061, RSMo, in the Circuit Court of Jackson County, Missouri.

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 X. Harassment - 1st Degree (565.090-003Y20205399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.090, RSMo, committed the **class E felony of harassment in the first degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant without good cause, engaged in an act with the purpose to cause emotional distress to **REDACTED** by using a firearm to prevent escape and such act did cause **REDACTED** suffer emotional distress.

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.

Count XI. Armed Criminal Action (571.015-001Y20205212.0)

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 about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of harassment charged in Count 10, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of harassment by, with and through, the knowing use, assistance and aid of a deadly weapon.

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 XII. Assault - 3rd Degree (565.054-002Y20201306.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the class E felony of assault in the third degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to **REDACTED** by biting **REDACTED**'s arm.

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.

Count XIII. Harassment - 1st Degree (565.090-003Y20205399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.090, RSMo, committed the **class E felony of harassment in the first degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant without good cause, engaged in an act with the purpose to cause emotional distress to **REDACTED** by using a firearm to prevent escape and such act did cause **REDACTED** suffer emotional distress.

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.

Count XIV. Armed Criminal Action (571.015-001Y20205212.0)

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 about on or about January 14, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of harassment charged in Count 13, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of harassment by, with and through, the knowing use, assistance and aid of a deadly weapon.

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.

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/ Eric L Honea

Eric L Honea (#75007)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3999
ehonea@jacksongov.org

State vs. Steve Coleman, Case No.

WITNESSES:

The State's witnesses as of 1/17/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

