

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

POLICE NO. : KC25002143

PROSECUTOR NO. : 095482591

OCN:

STATE OF MISSOURI,

PLAINTIFF,

vs.

JOSEAN LEE

3424 Park Ave

Kansas City, MO 64109

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

CASE NO. 2516-CR

DIVISION

DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Harassment - 1st Degree (565.090-003Y20205309.0)

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 13, 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]

and such act did cause [REDACTED]

[REDACTED] to 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 II. Knowingly Disturb/Destroy/Remove/Vandalize/Damage A Marked Or Unmarked Burial Site (194.410-001Y20205599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 194.410, RSMo., committed the Class E Felony of knowingly disturbing a human burial site, punishable upon conviction under Sections 558.011 and 558.002, RSMo., in that on or about January 13, 2025, in the County of Jackson, State of Missouri, the defendant knowingly disturbed, destroyed, vandalized, or damaged the human burial site of [REDACTED] by knocking over his gravestone.

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 III. Property Damage 1st Degree (569.100-001Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo, committed the class E felony of property damage in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 13, 2025, in the County of Jackson, State of Missouri, the defendant knowingly damaged a gravestone at [REDACTED], which property was owned by [REDACTED], by knocking it over, and the damages to such property exceeded seven hundred and fifty dollars.

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.

State vs. Josean Lee, Case No.

MELESA N. JOHNSON

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ P. Benjamin Cox

P. Benjamin Cox (#60757)

Assistant Prosecuting Attorney

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WITNESSES:

The State's witnesses as of 1/21/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.