

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

POLICE NO. :	KC25012227
PROSECUTOR NO. :	095483276
OCN:	1I003947

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
)
 JAVAUNE L. TUCKER)
)
) CASE NO. 2516-CR00795
)
) DIVISION 25
)
 Kansas City, MO 64132)
)
)
 DOB:)
)
)
 Race/Sex: B/M)
)
)
 S.S.N.:)
)
)
 DEFENDANT.)

AMENDED COMPLAINT

Count I. Unlawful Possession Of A Firearm (571.070-004Y20245212.0)

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 C felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a black .40 caliber Glock 23, a firearm, on July 18, 2024, the defendant was convicted of Tampering in the First Degree in Case No. 1816-CR02368-01 in the Circuit Court of Jackson County in the State of Missouri.

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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. Unlawful Possession Of A Firearm (571.070-004Y20245212.0)

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 C felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed a 9mm Taurus handgun, a firearm, and on July 18, 2024, the defendant was convicted of tampering in the first degree in Case No. 1816-CR02368-01 in the Circuit Court of Jackson County in the State of Missouri.

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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 Possession, Transport, Manufacture, Repair Or Sale Of Illegal Weapon (571.020-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.010.1, RSMo., committed the **class D felony of unlawful possession of a weapon**, punishable upon conviction under Sections 558.011 and 558.002, RSMo., in that on or about June 21, 2023, in the County of Jackson, State of Missouri, the defendant knowingly possessed a machine gun, TO WIT a Glock 23 modified with a switch.

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 Motor Vehicle - 1st Degree (569.080-002Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the **class D felony of tampering in the first degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner possessed a gray 2015 Jeep Grand Cherokee, an automobile.

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 V. Burglary - 2nd Degree (569.170-001Y20202299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about February 26, 2025, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED] and possessed by [REDACTED], for the purpose of committing stealing therein.

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 VI. Burglary - 2nd Degree (569.170-001Y20202299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED] and owned by [REDACTED], for the purpose of committing stealing therein.

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 VII. Burglary - 2nd Degree (569.170-001Y20202299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED] and possessed by [REDACTED], for the purpose of committing stealing therein.

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 VIII. Burglary - 2nd Degree (569.170-001Y20202299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED] and possessed by [REDACTED], for the purpose of committing stealing therein.

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 IX. Burglary - 2nd Degree (569.170-001Y20202299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED] and possessed by [REDACTED], for the purpose of committing stealing therein.

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 X. Burglary - 2nd Degree (569.170-001Y20202299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the **class D felony of burglary in the second degree**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about March 1, 2025, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED] and possessed by [REDACTED], for the purpose of committing stealing therein.

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.

MELESA N. JOHNSON

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jonah R Hall

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WITNESSES:

The State's witnesses as of 3/10/2025 are included on the "State's Witness List" filed contemporaneously with this Amended Complaint.