

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

|                         |              |
|-------------------------|--------------|
| <b>POLICE NO. :</b>     | 202419000053 |
| <b>PROSECUTOR NO. :</b> | 095482289    |
| <b>OCN:</b>             |              |

**STATE OF MISSOURI,** )

**PLAINTIFF,** )

**vs.** )

**MICHAEL C MCLIN** )

**29000 E. 227th St.** )

**Pleasant Hill, MO 64080** )

**DOB:** [REDACTED] )

**Race/Sex: W/M** )

**S.S.N.:** [REDACTED] )

**DEFENDANT.** )

**CASE NO. 2516-CR**  
**DIVISION**

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Financial Exploitation Of Elderly/Disabled Person (570.145-001Y20202602.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the Defendant, in violation of Section 570.145, committed the class A felony of financial exploitation of an elderly person, punishable upon conviction under Section 558.011, RSMo, in that between June 1, 2022 and June 30, 2024, in the County of Jackson, State of Missouri, the Defendant knowingly and by deceit obtained control over US currency of [REDACTED], an elderly person, with the intent to permanently deprive [REDACTED] of the use, benefit, or possession of her property, thereby benefitting the Defendant; and the value of said property exceeded seventy-five thousand dollars.

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. Stealing - \$25,000 Or More (570.030-034Y20202399.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the Defendant, in violation of Section 570.030, RSMo, committed the class C felony of stealing, punishable upon conviction under Sections 558.002

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and 558.011, RSMo, in that between June 1, 2022 and June 30, 2024, in the County of Jackson, State of Missouri, the Defendant appropriated US currency of a value of at least twenty-five thousand dollars, which property was owned by [REDACTED], and Defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof.

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.

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/ Emily Rose Pelz

Emily Rose Pelz (#72287)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

The State's witnesses as of 4/17/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.