

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

FILED
 DIVISION 14

07-Aug-2025 18:20

POLICE NO. : KC25049720

PROSECUTOR NO. : 095485801

OCN:

CIRCUIT COURT OF JACKSON COUNTY, MO

BY Laurie D. Baue

STATE OF MISSOURI,

PLAINTIFF,

vs.

AREL A. DAWKINS

1001 NW CANTERBURY RD

BLUE SPRINGS, MO 64138

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2516-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Murder 1st Degree (565.020-001Y20200911.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the Defendant, in violation of Section 565.020, RSMo, committed the **Class A Felony of Murder in the First Degree** punishable upon conviction under Section 565.020, RSMo, in that on or about on or about August 6, 2025, in the County of Jackson, State of Missouri, the Defendant, after deliberation, knowingly caused the death of [REDACTED] by striking her with a motor vehicle and by shooting her, and that the Defendant was eighteen years of age or older at the time of the offense.

The offense of Murder in the First Degree is a Class A Felony, and, if a person is eighteen years of age or older at the time of the offense, the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor. If a person has not reached his or her eighteenth birthday at the time of the commission of the offense, the punishment shall be as provided under Section 565.033, RSMo.

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 (571.015-001Y20205299.0)

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 August 6, 2025, in the County of Jackson, State of Missouri, the Defendant committed the Felony of Murder 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 Murder in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon and a dangerous instrument.

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen 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 five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) 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/ Luke H. Alsobrook
Luke H. Alsobrook (#66442)

Assistant Prosecuting Attorney
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WITNESSES:

The State's witnesses as of 8/7/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.