

FILED
DEC 08 2023

IN THE CIRCUIT COURT OF PLATTE COUNTY, MISSOURI
SIXTH JUDICIAL CIRCUIT

KIMBERLY K JOHNSON
Clerk of the Circuit Court Platte County, MO

STATE OF MISSOURI,

Plaintiff,

vs.

JAMES D JONES,

Defendant,

)
)
)
) Case No. 2346 - CR02998
) Div. IV
)

COMPLAINT AND REQUEST FOR A WARRANT

Eric G. Zahnd, Platte County Prosecuting Attorney, State of Missouri and Amanda K. Hanson, Assistant Prosecuting Attorney, upon information and belief, charge that the defendant:

COUNT I

In violation of Section 566.100, RSMo, committed the class B felony of sexual abuse in the first degree punishable upon conviction under Section 558.011, RSMo, and subject to lifetime supervision under Section 217.735 and Section 559.106, RSMo, in that on or about September 13, 2023, in the County of Platte, State of Missouri, the defendant knowingly had sexual contact with a Confidential Victim, who was a person incapable of consent because of her inability to see behind her back, and who was manifestly unable to make a reasonable judgment as to the nature or harmfulness of the sexual contact, and the sexual contact consisted of the defendant causing semen to come into contact with the Confidential Victim for the purpose of arousing or gratifying the sexual desire of the defendant.

The defendant previously, on October 8, 2019 in the Associate Circuit Court of Clay County, had been found guilty of Attempted Sexual Misconduct in the first degree as provided in Section 566.093.

566.100-002Y20201199.0

The facts that form the basis for this information and belief are contained in the attached statement of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause for the issuance of the warrant.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

12/8/23 2:44 p.m.
Amy R. Belford
\$100,000 cash only
GPS monitoring upon release
no contact with victim or location. * RBA

State v. James Jones, Jr.

RESPECTFULLY SUBMITTED,

**ERIC G. ZAHND
PROSECUTING ATTORNEY**

/s/ Amanda K. Hanson

Amanda K. Hanson, Bar No. 73383

Assistant Prosecuting Attorney

415 Third St., Suite 60

Platte City, Missouri 64079

(816) 858-3476 (816) 858-3472 (fax)