

AFFIDAVIT AND COMPLAINT IN FELONY CASE

STATE OF MISSOURI)
)
COUNTY OF CLAY)

NO. 12CY-CR0

Div.

IN THE CIRCUIT COURT OF CLAY COUNTY, MISSOURI
ASSOCIATE DIVISION

THE STATE OF MISSOURI,
vs.

Plaintiff.)

James C Simpson W/M)
)
)
)
Claycomo, MO 64119)

Defendant.) PA No. 047295110

Zachary Thompson, Assistant Prosecuting Attorney, Clay County, Missouri,
being duly sworn, charges that the defendant,

COUNT: I

Charge Code: 2604599.0

In violation of Section 568.045, RSMo, committed the class C felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about September 20, 2012, in the County of Clay, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body, or health of K.D.S., a child less than seventeen years old, by padlocking K.D.S. unattended inside an apartment littered with used syringes, garbage, and dirty clothes.

~~_____ 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 two (2) years 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).~~

COUNT: II

Charge Code: 1500099.0

In violation of Section 570.030, RSMo, committed the class A misdemeanor of stealing, punishable upon conviction under Sections 558.011 and 560.016, RSMo, in that

on or about September 20, 2012, in the County of Clay, State of Missouri, the defendant appropriated women's undergarments, which property was owned by Maj-R-Thrift Store, and the defendant appropriated such property without the consent of Maj-R-Thrift Store and with the purpose to deprive it thereof.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed one thousand dollars (\$1,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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

Affiant further states that the facts set forth in said complaint are true, according to his best information, knowledge and belief.



Assistant Prosecuting Attorney

Subscribed and sworn to before me this _____ day of _____, 20_____.

Division Clerk