

IN THE CIRCUIT COURT OF CLAY COUNTY, LIBERTY, MISSOURI

STATE OF MISSOURI,		) NO. <u>23CY-CR02822</u>
vs.	Plaintiff.	)
		) Div. <u>6</u>
<u>John R. Wonder</u>		)
<u>White, Male, [REDACTED] /1992 DOB</u>		)
<u>[REDACTED]</u>		)
<u>Kansas City, MO [REDACTED]</u>		)
	Defendant.	)

**COMPLAINT AND REQUEST FOR A WARRANT**

The Prosecuting Attorney of the County of Clay, State of Missouri, upon information and belief, charges that the defendant,

COUNT: I

**Charge Code: 565.020-001Y20200902.0**

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 September 22, 2023, in the County of Clay, State of Missouri, the defendant after deliberation, knowingly caused the death of victim 1 by cutting her and strangling her.

Murder in the first degree is a class A felony, and the punishment shall be either death or imprisonment for life without eligibility for probation or parole, or release except by act of the governor; except that, if a person has not reached his sixteenth birthday at the time of the commission of the crime, the punishment shall be imprisonment for life without eligibility for probation or parole, or release except by act of the governor.

COUNT: II

**Charge Code: 571.015-001Y20205299.0**

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 September 22, 2023, in the County of Clay, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count I, 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.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. 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 fifteen (15) years, without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action

in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed thirty (30) years, without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 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.

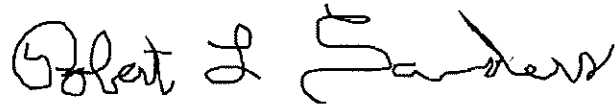
Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

ZACHARY THOMPSON

Clay County, Missouri,

Prosecuting Attorney

By:



Robert L. Sanders, MO Bar #  
45926

Assistant Prosecuting Attorney

Clay County Courthouse

11 S. Water Street

Liberty, Missouri 64068

Witnesses:

