

IN THE CIRCUIT COURT OF JASPER COUNTY, MISSOURI  
ASSOCIATE DIVISION, AT JOPLIN

STATE OF MISSOURI )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 LANE JORDAN STEPHENS )  
 )  
 Defendant. )  
 )

Case No. 20AO-CR00682  
OCN:  
PA File #: 080902

AGENCY: Carthage Police Department  
CHARGE CODE: 565.020-001Y19840903.  
571.015-001Y19755213.  
565.072-001Y19991301.  
571.015-001Y19755213  
570.023-001Y20171299.  
571.015-001Y19755299.  
570.023-001Y20171299.  
571.015-001Y19755299.

AMENDED  
COMPLAINT

State of Missouri )  
 ) ss  
County of Jasper )

Count I

The Prosecuting Attorney of the County of Jasper, 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 1, 2020, in the County of Jasper, State of Missouri, the defendant after deliberation, knowingly caused the death of Don Pierce by shooting him.

Count II

The Prosecuting Attorney of the County of Jasper, 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 on or about August 1, 2020, in the County of Jasper, State of Missouri, the defendant committed the felony of Murder charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder by, with and through, the knowing use, assistance and aid of a deadly weapon.

### Count III

The Prosecuting Attorney of the County of Jasper, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.072, RSMo, committed the class A felony of domestic assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about August 1, 2020, in the County of Jasper, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] by shooting [REDACTED] and [REDACTED] and defendant were family or household members in that [REDACTED] was the spouse of the defendant.

### Count IV

The Prosecuting Attorney of the County of Jasper, 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 on or about August 1, 2020, in the County of Jasper, State of Missouri, the defendant committed the felony of Domestic Assault charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Domestic Assault by, with and through, the knowing use, assistance and aid of a deadly weapon.

### Count V

The Prosecuting Attorney of the County of Jasper, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about August 1, 2020, in the County of Jasper, State of Missouri, the defendant forcibly stole a vehicle in the possession of CH, and in the course thereof defendant was armed with a deadly weapon.

### Count VI

The Prosecuting Attorney of the County of Jasper, 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 1, 2020, in the County of Jasper, State of Missouri, the defendant committed the felony of Robbery charged in Count V all allegations of which are incorporated herein by reference, by, with and through, the knowing use, assistance and aid of a deadly weapon.

### Count VII

The Prosecuting Attorney of the County of Jasper, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about August 1, 2020, in the County of Jasper, State of Missouri, the defendant forcibly stole a vehicle owned by CC, and in the course thereof defendant threatened the immediate use of a dangerous instrument against CC.

### Count VIII

The Prosecuting Attorney of the County of Jasper, 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 1, 2020, in the County of Jasper, State of Missouri, the defendant committed the felony of Robbery charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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.

Theresa Kenney  
Prosecuting Attorney of the  
County of Jasper, State of Missouri, by



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Office of Prosecuting Attorney

**20AO-CR00682 - ST V LANE J STEPHENS (E-CASE)**

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**Charge/Judgment**

**Description:** Murder 1st Degree { *Felony A RSMo: 565.020* }

**Date:** 08/01/2020      **Code:** 565.020-001Y198409.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD

**Next Charge/Judgment**

**Description:** Armed Criminal Action { *Felony Unclassified RSMo: 571.015* }

**Date:** 08/01/2020      **Code:** 571.015-001Y197552.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD

**Next Charge/Judgment**

**Description:** Domestic Assault - 1st Degree - Serious Physical Injury { *Felony A RSMo: 565.072* }

**Date:** 08/01/2020      **Code:** 565.072-001Y199913.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD

**Next Charge/Judgment**

**Description:** Armed Criminal Action { *Felony Unclassified RSMo: 571.015* }

**Date:** 08/01/2020      **Code:** 571.015-001Y197552.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD

**Next Charge/Judgment**

**Description:** Robbery - 1st Degree { *Felony A RSMo: 570.023* }

**Date:** 08/01/2020      **Code:** 570.023-001Y201712.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD

**Next Charge/Judgment**

**Description:** Armed Criminal Action { *Felony Unclassified RSMo: 571.015* }

**Date:** 08/01/2020      **Code:** 571.015-001Y197552.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD

**Next Charge/Judgment**

**Description:** Robbery - 1st Degree { *Felony A RSMo: 570.023* }

**Date:** 08/01/2020      **Code:** 570.023-001Y201712.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD

**Next Charge/Judgment**

**Description:** Armed Criminal Action { *Felony Unclassified RSMo: 571.015* }

**Date:** 08/01/2020      **Code:** 571.015-001Y197552.0

**OCN:** FC012500      **Arresting Agency:** CARTHAGE PD