

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

STATE OF MISSOURI,	)	
	)	
Plaintiff,	)	
vs.	)	
	)	
JUSTIN M. LEGGINS,	)	Case No.
	)	OCN
	)	PA File No.
	)	
JACOB A. CASE,	)	Case No.
	)	OCN
	)	PA File No.
	)	
AARON C. BROWN,	)	Case No.
	)	OCN
	)	PA File No.
	)	
GREGORY H. VARNER,	)	Case No.
	)	OCN
and	)	PA File No.
	)	
BRYANNE M. BRADSHAW,	)	Case No.
	)	OCN
Defendants.	)	PA File No.

**JOINT FELONY COMPLAINT**

COUNT: I

Charge Code: 565.052-001Y20201399.2

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Justin M. Leggins, in violation of Section 565.052, RSMo, committed the class D felony of **accessory assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 8, 2023, in the County of Cole, State of Missouri, the defendant, acting alone or in concert with others, recklessly caused physical injury to Confidential Victim by pepper-spraying Confidential Victim in the face.

COUNT: II

Charge Code: 565.021-003Y20200999.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Justin M. Leggins, in violation of Section 565.021, RSMo, committed the class A felony of **murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about December 8, 2023, in the County of Cole, State of Missouri, Confidential Victim was killed by the perpetration of the class D felony of assault in the second degree under Section 565.052, RSMo, as charged in Count I and hereby incorporated, committed by the defendant on or about December 8, 2023, in the County of Cole, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

COUNT: III

Charge Code: 565.052-001Y20201399.2

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Jacob A. Case, in violation of Section 565.052, RSMo, committed the class D felony of **accessory assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 8, 2023, in the County of Cole, State of Missouri, the defendant, acting alone or in concert with others, recklessly caused physical injury to Confidential Victim by pepper-spraying Confidential Victim in the face.

COUNT: IV

Charge Code: 565.021-003Y20200999.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Jacob A. Case, in violation of Section 565.021, RSMo, committed the class A felony of **murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in

that on or about on or about December 8, 2023, in the County of Cole, State of Missouri, Confidential Victim was killed by the perpetration of the class D felony of assault in the second degree under Section 565.052, RSMo, as charged in Count III and hereby incorporated, committed by the defendant on or about December 8, 2023, in the County of Cole, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

COUNT: V

Charge Code: 565.052-001Y20201399.2

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Aaron C. Brown, in violation of Section 565.052, RSMo, committed the class D felony of **accessory assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 8, 2023, in the County of Cole, State of Missouri, the defendant, acting alone or in concert with others, recklessly caused serious physical injury to Confidential Victim by placing a mask over Confidential Victim's face which inhibited Confidential Victim's ability to breathe.

COUNT: VI

Charge Code: 565.021-003Y20200999.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Aaron C. Brown, in violation of Section 565.021, RSMo, committed the class A felony of **murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about December 8, 2023, in the County of Cole, State of Missouri, Confidential Victim was killed by the perpetration of the class D felony of assault in the second degree under Section 565.052, RSMo, as charged in Count V and hereby

incorporated, committed by the defendant on or about December 8, 2023, in the County of Cole, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

COUNT: VII

Charge Code: 565.052-001Y20201399.2

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Gregory H. Varner, in violation of Section 565.052, RSMo, committed the class D felony of **accessory assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 8, 2023, in the County of Cole, State of Missouri, the defendant, acting alone or in concert with others, recklessly caused serious physical injury to Confidential Victim by leaving Confidential Victim in a position which caused his asphyxiation.

COUNT: VIII

Charge Code: 565.021-003Y20200999.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Gregory H. Varner, in violation of Section 565.021, RSMo, committed the class A felony of **murder in the second degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about December 8, 2023, in the County of Cole, State of Missouri, Confidential Victim was killed by the perpetration of the class D felony of assault in the second degree under Section 565.052, RSMo, as charged in Count VII and hereby incorporated, committed by the defendant on or about December 8, 2023, in the County of Cole, State of Missouri.

COUNT: IX

Charge Code: 565.027-001Y20200999.2

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, Bryanne M. Bradshaw, in violation of Section 565.027, RSMo, committed the class E felony of **accessory involuntary manslaughter in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about December 8, 2023, in the County of Cole, State of Missouri, the defendant, acting alone or in concert with others, negligently caused the death of Confidential Victim by leaving Confidential Victim in a position which caused Confidential Victim's asphyxiation.

WHEREFORE, the Prosecuting Attorney requests that arrest warrants be issued as provided by law.

WM. LOCKE THOMPSON  
Prosecuting Attorney of the County of Cole,  
State of Missouri, by

/s/ *Wm. Locke Thompson*

Wm. Locke Thompson #68437  
311 E. High Street, 3rd Floor  
Jefferson City, Missouri 65101  
Phone: 573-634-9180  
Fax: 573-634-7797  
E-mail: Locke.Thompson@prosecutors.mo.gov