Electronically Filed - COLE CIRCUIT - October 30, 2026 - 10:19 AM

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

STATE OF MISSOURI,	)	
Plaintiff,	)	
	)	
vs.	)	No.
	)	OCN
JUSTIN ALAN VANLEY,	)	
	)	PA File No. 051134650
	)	
Defendant.	)	

FELONY COMPLAINT

COUNT: I
Charge Code: 570.090-001Y20202504.0

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, in violation of Section 570.090, RSMo, committed the class D felony of **forgery**, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about October 29, 2026, in the County of Cole, State of Missouri, the defendant, with the purpose to defraud, used as genuine writings, namely identification cards, pay stubs, and bank statements, which the person knew were fraudulent.

COUNT: II
Charge Code: 570.030-035Y20202301.1

The Prosecuting Attorney of the County of Cole, State of Missouri, charges that the defendant, in violation of Section 570.030, RSMo, committed the class E felony of **attempted stealing**, punishable upon conviction under Sections 558.002 and 558.011 RSMo, in that on or about October 29, 2026, in the County of Cole, State of Missouri, the defendant used as genuine fraudulent writings, and such conduct was a substantial step toward the commission of the offense of stealing U.S. currency of the value of at least seven hundred and fifty dollars, and was done for the purpose of committing such stealing.

The facts that form the basis for this information and belief are contained in the attached statement(s) 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.

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



Tyler Ryan #72994
Assistant Prosecuting Attorney
311 E. High Street, 3rd Floor
Jefferson City, Missouri 65101
Phone: 573-634-9180
Fax: 573-634-7797
Email: Tyler.Ryan@prosecutors.mo.gov

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