IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT INDEPENDENCE

POLICE NO). :	25-01539	90	
PROSECUTOR NO	UTOR NO.:		97	FILED
OC	'N:	1q00140	2	DIVISION 28
STATE OF MISSOURI, PI vs.	LAIN) VTIFF,)		circuit court of Jackson county, mo By Jeffrey Les DCA
AUSTIN J MEYER 1007 S Prairie St Liberty, MO 64068 DOB: Race/Sex: W/M S.S.N.:))))	CASE NO DIVISIO	O. 2516-CR ON
DEF	ENI	DANT.)		

COMPLAINT WARRANT REQUESTED

Count I. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a video, A_FFM_CP, which depicts an male child pulling down the pants of a female child, exposing her vagina, and preforming oral sex.

The range of punishment for a class B felony 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 fifteen (15) years.

Count II. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon

conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a video, with the file name of A_jenny, depicting 4 still images of a female child tied to a bed with her vagina and breasts exposed, and a video with the same female child bound by rope performing oral sex on an adult male.

The range of punishment for a class B felony 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 fifteen (15) years.

Count III. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged sexually explicit conduct, consisting of a video, with the file name of Ajb_More_Similar_Videos_Please, which depicts an underage female who vagina becomes exposed and appears be having intercourse to with dog.

The range of punishment for a class B felony 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 fifteen (15) years.

Count IV. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a video, with the file name of ajb_show_blondie__i_will_see__there_is_lota_AJB....a_few_girls_did_just_one_vid__o ther_girls_did_lota_vids, which depicts a female child exposing and touching her vagina.

The range of punishment for a class B felony 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 fifteen (15) years.

Count V. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a video, with the file name of Daddy Please Stroke Your Cock For Me, which depicts an female child touching her exposed vagina.

The range of punishment for a class B felony 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 fifteen (15) years.

Count VI. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a video, with the file name of Katya_y111_Vladmodels_pd20m-Bernt_full_, which depicts a female child dancing in a sexually suggestive manner and removing clothing leaving a see-through shirt which exposes her breasts while simulating oral sex with an object.

The range of punishment for a class B felony 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 fifteen (15) years.

Count VII. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of twenty-one or more still images as follows: file name, katya-y111-lalistars-photo-compilation, which depicts a slide show of approximately

84 images of female children positioned and posed in sexually suggestive positions wearing shirts which expose their breasts.

The range of punishment for a class B felony 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 fifteen (15) years.

Count VIII. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a video, with the file name of ls-mag_08-07_happy_birthday_party_01_full, which depicts two female children who expose their breast and vagina and simulate sex acts.

The range of punishment for a class B felony 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 fifteen (15) years.

Count IX. Possession Of Child Pornography - 2nd/Subsequent Offense Or Possess More Than 20 Pictures/One Film/Videotape (573.037-001Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class B felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a video, with the file name of Maid, which depicts a female child dressed in a maid's outfit exposing her vagina and masturbating.

The range of punishment for a class B felony 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 fifteen (15) years.

Count X. Possession Of Child Pornography - 1st Offense (573.037-002Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class D felony of possession of child pornography, punishable upon

conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a still image, with name A Oxi nude full frontal, which depicts nude female child. a The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year 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 ten thousand dollars (\$10,000); 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.

Count XI. Possession Of Child Pornography - 1st Offense (573.037-002Y20203799.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 573.037, RSMo, committed the class D felony of possession of child pornography, punishable upon conviction under Sections 573.037 and 558.011, RSMo, in that on or about March 19, 2025, in the County of Jackson, State of Missouri, the defendant knowingly possessed child pornography that was a visual depiction of a person less than eighteen years of age engaged in sexually explicit conduct, consisting of a still image, with the file name Katya_y111_Baby_Oil__4_, which depicts a female child posing in a sexual manner with see through underwear and shirt exposing her vagina and breasts.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year 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 ten thousand dollars (\$10,000); 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.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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.

MELESA N. JOHNSON

Prosecuting Attorney Jackson County, Missouri by,

/s/ Jared Gernetzke

Jared Gernetzke (#75565) Assistant Prosecuting Attorney 321 West Lexington Avenue Independence, MO 64050 (816) 881-1505 jgernetzke@jacksongov.org

WITNESSES:

The State's witnesses as of 3/20/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.