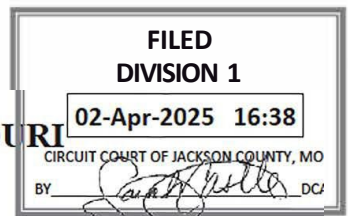


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**



POLICE NO. :	KC25018952
PROSECUTOR NO.:	095483818
OCN:	

STATE OF MISSOURI,

PLAINTIFF,

vs.

EVAN A. WERTS

**3560 GENESSEE ST
Kansas City, MO 64111**

DOB: [REDACTED]

Race/Sex: W/M

S.S.N.: [REDACTED]

DEFENDANT.

**CASE NO. 2516-CR
DIVISION**

**COMPLAINT
WARRANT REQUESTED**

Count I. Burglary - 2nd Degree (569.170-001Y20202203.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about March 30, 2025, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in a building, located at [REDACTED], for the purpose of committing stealing therein.

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 II. Property Damage 1st Degree (569.100-001Y20202901.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.100, RSMo,

committed the class E felony of property damage in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 30, 2025, in the County of Jackson, State of Missouri, the defendant knowingly damaged door and door window, which property was owned by [REDACTED] by kicking and breaking, and the damages to such property exceeded seven hundred and fifty dollars.

The range punishment for a class E 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 four (4) 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 III. Stealing (570.030-043Y20202308.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class A misdemeanor of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 30, 2025, in the County of Jackson, State of Missouri, the defendant appropriated wine and whiskey bottles which property was owned by [REDACTED], and defendant appropriated [REDACTED] property without the consent of [REDACTED] and with the purpose to **deprive**— thereof.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count IV. Stealing (570.030-043Y20202308.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class A misdemeanor of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 30, 2025, in the County of Jackson, State of Missouri, the defendant appropriated cash which property was owned by [REDACTED] and defendant appropriated [REDACTED] property without the consent of [REDACTED] and with the purpose to **deprive**— thereof.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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

State vs. Evan A. Werts, Case No.

more than double the amount of the offender's gain from the commission of the crime up to a maximum of twenty thousand dollars (\$20,000).

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/ Stephen P. Bertelsman

Stephen P. Bertelsman (#74569)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
sbertelsman@jacksongov.org

WITNESSES:

The State's witnesses as of 4/2/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

