

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

POLICE NO. :	KC25028932
PROSECUTOR NO. :	095484399
OCN:	11005630

STATE OF MISSOURI,

PLAINTIFF,

vs.

CARLOS NAJERA

1435 S 33RD ST

KANSAS CITY, KS 66106

DOB:

Race/Sex: *HIM*

S.S.N.:

DEFENDANT.

CASE NO. 2516-CR

DIVISION

FILED

DIVISION 33

10-May-2025 14:16

CIRCUIT COURT OF JACKSON COUNTY, MO

BY *Jeffrey S. Bush* DCA

COMPLAINT
WARRANT REQUESTED

Count I. Aggravated Fleeing A Stop Or Detention (575.151-003Y20244902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.151, RSMo, committed the class D felony of aggravated fleeing a stop or detention of a motor vehicle, punishable upon conviction under Sections 558.002 and 558.011, in that on or about May 9, 2025, in the County of Jackson, State of Missouri, law enforcement officers were attempting to make a stop of a motor vehicle being operated by defendant, and defendant knew that the officers were making a stop, and for the purpose of preventing the officers from effecting the stop, defendant operated such motor vehicle at excessive rates of speed and ultimately struck another vehicle.

An individual convicted and sentenced for this offense shall not be eligible for probation, parole, or conditional release until the individual has served no less than one (1) year of such sentence.

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

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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/ Alec D. Guy
Alec D. Guy (#72825)
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WITNESSES:

The State's witnesses as of 5/10/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

