

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC25043899
PROSECUTOR NO. :	095485963
OCN:	

FILED DIVISION 9 20-Aug-2025 11:02 CIRCUIT COURT OF JACKSON COUNTY, MO BY <i>Julia H. Heston</i> DCA
--

STATE OF MISSOURI,)
)
 PLAINTIFF,)
)
 vs.)
)
 ADAN GUSTAVO CERRITOS-FLORES)
 [REDACTED])
 Kansas City, MO 64132)
 DOB: [REDACTED])
 Race/Sex: H/M)
 S.S.N.: [REDACTED])
 DEFENDANT.)

CASE NO. 2516-CR
DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Tampering With A Witness In A Felony Prosecution (575.270-001Y20205099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.270, RSMo, committed the class D felony of tampering with a witness, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 12, 2025, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, with the purpose to induce [REDACTED] to absent himself or withhold testimony at trial as a victim in State v. Julian Chavarria, 2516-CR03604 and/or State v. Antonio Lopez-Hernandez 2516-CR03566, both cases charging felony unlawful use of a weapon, the defendant did so by posting threats on Instagram stating "death to all rats."

A person convicted of this offense shall not be eligible for parole.

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 IV. Tampering With A Witness In A Felony Prosecution (575.270-001Y20205099.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.270, RSMo, committed the class D felony of tampering with a witness, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 14, 2025, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with others, with the purpose to induce [REDACTED] to absent himself or withhold testimony at trial as a victim in State v. Julian Chavarria, 2516-CR03604 and/or State v. Antonio Lopez-Hernandez 2516-CR03566, both cases charging felony unlawful use of a weapon, the defendant did so by posting threats on Instagram stating "death to all rats."

A person convicted of this offense shall not be eligible for parole.

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/ Kristiane N. Bryant

Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St.
Floor 7M
Kansas City, MO 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

State vs. Adan Gustavo Cerritos-Flores, Case No.

The State's witnesses as of 8/20/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.