IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT INDEPENDENCE FILED POLICE NO.: 23-002145 **CRIMINAL RECORDS** Not an Official (PROSECUTOR NO. : 15 095485225 15-OCT-2025 10:14 OCN: 10002859 16TH JUDICIAL CIRCUIT OF MISSOURI Madelyn Harry STATE OF MISSOURI, al Court Document Not an Official CouPLAINTIFF, Not an Official Court Document Not an Official Court Document Not an Official Court Document BLAKE A. SAJDAK 134 N. Gilbert St. Court Document Independence, MO 64056 DOB: Race/Sex: W/M S.S.N.: DEFENDANT. of an Official Court Document AMENDED COMPLAINT an Official Court Document Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-003Y20200999.0) Washer Document Not an Office The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo., committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo., in that on or between January 9, 2023 and January 10, 2023, in the County of Jackson, State of Missouri, was killed by fentanyl overdose as a result of the attempted perpetration of the class B felony of Delivery of a Controlled Substance to a minor who was at least two years younger than the defendant under Section 579.020, RSMo., committed by the defendant on or between

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served. The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

January 9, 2023 and January 10, 2023, in the County of Jackson, State of Missouri.

Count II. Delivery Of Controlled Substance Except 35 Grams Or Less Of Marijuana Or Synthetic Cannabinoid - Person Less Than 17 Yoa And 2 Yrs Younger (579.020-002Y20223599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo., committed the class B felony of delivery of a controlled substance, punishable upon conviction under Sections 558.011, RSMo., in that on or between January 9, 2023 and January 10, 2023, in the County of Jackson, State of Missouri, the defendant knowingly, acting alone or in concert with others, distributed fentanyl, a controlled substance, to a person less than seventeen years of age who was at least two years younger than the defendant, knowing that it was a controlled substance.

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.

The facts that form the basis for this information and belief are contained in the previously filed statement(s) of facts, incorporated herein and submitted as a basis upon which this court may find the existence of probable cause.

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Prosecuting Attorney
Jackson County, Missouri
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Prosecuting Attorney
Jackson County, Missouri
by,

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WITNESSES:

The State's witnesses as of 10/15/2025 are included on the "State's Witness List" filed contemporaneously with this Amended Complaint.