

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC25022195
PROSECUTOR NO. :	095484037
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
KENDALL S. COLEMAN)	
1535 S. Spring St.)	CASE NO. 2516-CR
Independence, MO 64055)	DIVISION
DOB: [REDACTED])	
Race/Sex: W/M)	
S.S.N.: [REDACTED])	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y20201302.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the class A felony assault in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about April 12, 2025, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] by striking [REDACTED] with an ATV, and in the course thereof [REDACTED] was a special victim as defined by Section 565.002 and [REDACTED] was a special victim as defined by Section 565.002.

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.

Count II. Armed Criminal Action (571.015-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about April 12, 2025, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

Count III. 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 April 14, 2025, in the County of Jackson, State of Missouri, [REDACTED], law enforcement officer, was attempting to make a stop of a motor vehicle being operated by defendant, and the defendant knew that the officers were making a stop, and for the purpose of preventing the officers from effecting the stop, operated such motor vehicle in a manner which created a substantial risk of serious physical injury or death to any person.

State vs. Kendall S. Coleman, Case No.

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
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WITNESSES:

The State's witnesses as of 4/23/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.