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**FOURTEENTH JUDICIAL DISTRICT
DISTRICT COURT OF MONTGOMERY COUNTY, KANSAS**

State of Kansas,

Plaintiff,

vs.

Case No.

**Tenisha Diane Mayberry,
2404 SW Walnut
Blue Springs, MO 64015
Defendant.**

AGENCY: Kansas Highway Patrol: 2025012481 - South

COMPLAINT / INFORMATION

COMES NOW the State of Kansas, by and through Melissa G. Johnson, duly qualified and appointed, Montgomery County Attorney, for and on behalf of the State of Kansas alleges and states for its *Complaint / Information* against the defendant, **Tenisha Diane Mayberry**:

COUNT I

Murder in 1st Degree - Felony Murder

That on or about September 26, 2025, in Montgomery County, Kansas, **TENISHA DIANE MAYBERRY** did unlawfully and feloniously kill a human being, to-wit: Serafina O'Connell, in the commission of, attempt to commit, or flight from an inherently dangerous felony, to-wit: Fleeing or Attempting to Elude a Police Officer, as defined in K.S.A. 8-1568(a)(1)(A) and (b)(1)(C), **Murder in the First Degree, an off-grid person felony**, in violation of K.S.A. 21-5402(a)(2) & (b). (Penalty Range: Life imprisonment in the custody of the Secretary of Corrections with a mandatory minimum term of imprisonment of not less than 25 years or a sentence equal to the sentence established for a severity level 1 crime pursuant to the sentencing

guidelines grid for non-drug crimes (up to 653 months), whichever is greater. The defendant shall not be eligible for parole prior to serving such mandatory minimum term of imprisonment, and such mandatory minimum term of imprisonment shall not be reduced by the application of good time credits. Further the defendant may be fined up to \$500,000.00, all pursuant to K.S.A. 21-6804, K.S.A. 21-6806, K.S.A. 21-6620, K.S.A. 21-6611(a)(1), and K.S.A. 22-3717, and amendments thereto.)

COUNT II

Aggravated Battery - Knowingly Great Body Harm/Disfigurement

That on or about September 26, 2025, in Montgomery County, Kansas, **TENISHA DIANE MAYBERRY** did unlawfully, feloniously, and knowingly cause great bodily harm to another person or disfigurement of another person, to-wit: Maia O'Connell, **Aggravated Battery, a severity level 4 person felony**, in violation of K.S.A. 21-5413(b)(1)(A) & (g)(2)(A). (Penalty Range: From a minimum of 38 months to a maximum of 172 months in prison and/or a fine of up to \$300,000 and 36 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(2), & 22-3717(d)(1)(A), and amendments thereto.)

COUNT III

Fleeing or Attempting to Elude a Police Officer

That on or about September 26, 2025, in Montgomery County, Kansas, **TENISHA DIANE MAYBERRY** was the driver of a motor vehicle and did unlawfully and knowingly fail or refuse to bring the vehicle the offender was driving to a stop for a pursuing police vehicle, when given visual or audible signal to bring the vehicle to a stop and engaged in reckless driving as defined by K.S.A. 8-1566, and amendments thereto, **Fleeing or Attempting to Elude a Police Officer, a severity level 9 person felony**, K.S.A. 8-1568(b)(1)(C) & (c)(2). (Penalty Range: From a minimum of 5 months to a maximum of 17 months in prison and/or a fine of up to \$100,000 and 12 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(3), & 22-3717(d)(1)(C), and amendments thereto.)

All of the said acts then and there committed being contrary to the statutes in such cases made and provided and being against the peace and dignity of the State of Kansas.

WITNESSES:

Maia O'Connell
Nick Reddy
Theresa Mayberry
Cortez Wasson
Brett Goins

Steven Klahr
Michael O'Hara
Henry Perryman
Joel S Powers
Walter Riddle

/s/ Melissa G. Johnson

STATE OF KANSAS)
) ss.
COUNTY OF MONTGOMERY)

/s/ Melissa G. Johnson
Melissa G. Johnson, #16601
Montgomery County Attorney

/s/ Sadie Sewell
Notary Public
My term expires: March 27, 2027