

IN THE CIRCUIT COURT OF VERNON COUNTY, MISSOURI  
ASSOCIATE DIVISION

STATE OF MISSOURI,  
Plaintiff,

vs.

SAMER M ABDEL-GHANI  
Defendant.

)  
)  
) Case No.:  
)  
) PA File No.: 217049337

**FELONY COMPLAINT**

COMES NOW, the Prosecuting Attorney of the County of Vernon, State of Missouri, upon her official oath, and being duly sworn upon oath and upon information and belief, and states that there is probable cause to believe that on or about January 10, 2024, the accused, Samer M Abdel-Ghani, committed the following crimes:

**COUNT I**

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 about January 10, 2024, in the County of Vernon, State of Missouri, Confidential Victim was killed by an overdose as a result of the perpetration of the class C felony of Delivery Controlled Substance Except 35 Grams Or Less Of Marijuana Or Synthetic Cannabinoid under section 579.020, RSMo. committed by the defendant.

**Charge Code: 565.021-003Y20200999.0**

**COUNT II**

in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 10, 2024, in the County of Vernon, State of Missouri, the defendant knowingly distributed fentanyl, a controlled substance, to Confidential Victim, knowing that it was a controlled substance.

**Charge Code: 579.020-004Y20223599.0**

**COUNT III**

in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 10, 2024, in the County of Vernon, State of Missouri, the defendant knowingly distributed fentanyl, a controlled substance, to Confidential Victim, knowing that it was a controlled substance.

**Charge Code: 579.020-004Y20223599.0**

**COUNT IV**

in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 10, 2024, in the County of Vernon, State of Missouri, the defendant knowingly distributed fentanyl, a controlled substance, to Confidential Victim, knowing that it was a controlled substance.

**Charge Code: 579.020-004Y20223599.0**

**COUNT V**

in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 10, 2024, in the County of Vernon, State of Missouri, the defendant knowingly distributed fentanyl, a controlled substance, to Confidential Victim, knowing that it was a controlled substance.

**Charge Code: 579.020-004Y20223599.0**

**COUNT VI**

in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about January 10, 2024, in the County of Vernon, State of Missouri, the defendant knowingly distributed fentanyl, a controlled substance, to Confidential Victim, knowing that it was a controlled substance.

**Charge Code: 579.020-004Y20223599.0**

contrary to the form of the criminal statutes in such cases made and provided and against the peace and dignity of the State of Missouri.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts concerning this matter, which statement(s) are made part hereof and are submitted herewith as a basis upon which this court may find the existence of probable cause for the issuance of an arrest warrant.

Wherefore, the Prosecuting Attorney prays that a warrant for the arrest of the defendant be issued as provided by law.

**VERNON COUNTY PROSECUTING ATTORNEY**

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by: \_\_\_\_\_

**Brandi McInroy**  
**PROSECUTING ATTORNEY**  
**MO BAR NO.: 58357**

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