

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC22035898
PROSECUTOR NO. :	095482139
OCN:	HU007854

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
EUNICE CARLO-MARTINEZ	)	
5155 Brookwood Ave	)	CASE NO. 2516-CR
Kansas City, MO 64110	)	DIVISION
DOB: [REDACTED]	)	
Race/Sex: W/F	)	
S.S.N.: [REDACTED]	)	
DEFENDANT.	)	

**COMPLAINT
WARRANT REQUESTED**

Count I. Accessory Abandonment Of A Corpse (194.425-001Y20205599.2)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 194.425, RSMo, committed the class E felony of abandonment of a corpse, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between May 23, 2022 and May 30, 2022 in the County of Jackson, State of Missouri, the defendant either acting alone or purposefully in concert with another, was in possession of the deceased corpse of [REDACTED] and knowingly disposed of the corpse of [REDACTED] near the intersection of 95th Street and Blue River Road, Kansas City, Jackson County, Missouri without properly reporting the location of the body to the proper law enforcement officials.

The range punishment for a class E 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 four (4) 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 II. Accessory Tampering With Physical Evidence In Felony Prosecution
(575.100-001Y20205006.2)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **Class E Felony of Tampering With Physical Evidence**, punishable upon conviction under Section 558.011, RSMo, in that on or between May 23, 2022, and May 30, 2022, in the County of Jackson, State of Missouri, the defendant acting alone or purposefully in concert with another suppressed or concealed the body of [REDACTED] with the purpose to impair or obstruct its availability in any official proceeding or investigation, and did impair or obstruct the prosecution or defense of a felony homicide.

The range punishment for a class E 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 four (4) 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/ Stephanie R. Sang
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WITNESSES:

The State's witnesses as of 1/8/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.