

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. : 25-005142
PROSECUTOR NO. : 095482727
OCN:

FILED
DIVISION 28

28-Jan-2025 17:47

CIRCUIT COURT OF JACKSON COUNTY, MO
BY Jeffrey C. Keal DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

JAVIER GARCIA-ARELLANO

8640 Greenway Lane

Lenexa, KS 66215

DOB: [REDACTED]

Race/Sex: H/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2516-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Dwi - Death Of Another Not A Passenger (577.010-033Y20205499.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.010, committed the **class B felony of driving while intoxicated – resulting in death**, punishable upon conviction under Sections 558.011 and 577.010, RSMo, in that on or about January 28, 2025, near I-70 and Noland Road in the County of Jackson, State of Missouri, the defendant operated a motor vehicle while under the influence of alcohol, and acted with criminal negligence by driving on the wrong side of a divided highway, and as a result caused death to [REDACTED], and [REDACTED] was not a passenger in the vehicle operated by the defendant.

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 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

State vs. Javier Garcia-Arellano, Case No.

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Joseph R Marquez

Joseph R Marquez (#75289)

Assistant Prosecuting Attorney

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Independence, MO 64050

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WITNESSES:

The State's witnesses as of 1/28/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.