

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

|                  |            |
|------------------|------------|
| POLICE NO. :     | KC24060379 |
| PROSECUTOR NO. : | 095484718  |
| OCN:             |            |

|                       |            |                  |
|-----------------------|------------|------------------|
| STATE OF MISSOURI,    | )          |                  |
|                       | PLAINTIFF, | )                |
| vs.                   | )          |                  |
|                       | )          |                  |
| IDONNAS J GAVRILYS    | )          |                  |
| 3131 S 49TH TER       | )          | CASE NO. 2516-CR |
| Kansas City, KS 66106 | )          | DIVISION         |
| DOB: [REDACTED]       | )          |                  |
| Race/Sex: B/M         | )          |                  |
| S.S.N.: [REDACTED]    | )          |                  |
|                       | DEFENDANT. | )                |

COMPLAINT  
WARRANT REQUESTED

**Count I. Burglary 1st Degree (569.160-001Y20202203.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the **class B felony of burglary in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 17, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at [REDACTED], Kansas City, and possessed by [REDACTED], for the purpose of committing stealing therein, and while in such a building another participant in the crime was armed with a deadly weapon.

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.

**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 October 17, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Burglary in the First Degree as charged in Count 1, all allegations of which are incorporated here by reference, and the defendant, acting alone or purposefully in concert with another, committed the foregoing felony of Burglary in the First Degree, by, with and through, the knowing use, assistance and aid of a deadly weapon.

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. Burglary - 2nd Degree (569.170-001Y20202299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about October 17, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at [REDACTED] Street, Kansas City, and possessed by [REDACTED], for the purpose of committing stealing therein.

The range punishment for a class D 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 seven (7) 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 IV. Burglary 1st Degree (569.160-001Y20202203.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the **class B felony of burglary in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 17, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at [REDACTED], Kansas City, and possessed by [REDACTED], for the purpose of committing stealing therein, and while in such a building another participant in the crime was armed with a deadly weapon.

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.

**Count V. 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 October 17, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Burglary in the First Degree as charged in Count 4, all allegations of which are incorporated here by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Burglary in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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 VI. Burglary 1st Degree (569.160-001Y20202299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the **class B felony of burglary in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 13, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at [REDACTED], Kansas City, and possessed by [REDACTED], for the purpose of committing stealing therein, and while in such a building another participant in the crime was armed with a deadly weapon.

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.

**Count VII. 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 December 13, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Burglary in the First Degree as charged in Count 6, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Burglary in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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 VIII. Burglary - 2nd Degree (569.170-001Y20202299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about on or about December 13, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at [REDACTED] Street, Kansas City, and possessed by [REDACTED], for the purpose of committing stealing therein.

The range punishment for a class D 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 seven (7) 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 IX. Burglary 1st Degree (569.160-001Y20202299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the **class B felony of burglary in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 13, 2024, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in a building, located at [REDACTED], Kansas City, and possessed by [REDACTED], for the purpose of committing stealing therein, and while in such a building another participant in the crime was armed with a deadly weapon.

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.

**Count X. 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 December 13, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Burglary in the First Degree as charged in Count 9, all allegations of which are incorporated here by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Burglary in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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 Crimi-

nal 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.

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/ P. Benjamin Cox  
P. Benjamin Cox (#60757)  
Assistant Prosecuting Attorney  
415 E. 12th St., 10<sup>th</sup> Floor  
Kansas City, MO 64106  
(816) 881-3975  
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**WITNESSES:**

The State's witnesses as of 6/6/2025 are included on the "State's Witness List" filed contemporaneously with this Complaint.

State vs. Idonnas J Gavrilys, Case No.