

IN THE CIRCUIT COURT OF CLAY COUNTY, LIBERTY, MISSOURI

STATE OF MISSOURI,)	
)	
Plaintiff,)	
)	Div. 7
vs.)	
)	
Kristi N. Gilley)	
W/F 01/01/1978)	
911 N. Woolridge Ln.)	
Liberty, MO 64068)	
)	
Defendant.)	PA No. 047318479

COMPLAINT AND REQUEST FOR A WARRANT

Charge Code: 565.153-003Y20201099.0

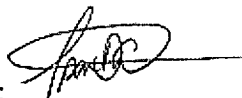
The Prosecuting Attorney of the County of Clay, State of Missouri, upon information and belief, charges that the defendant, in violation of The Prosecuting Attorney of the Clay, State of Missouri, charges that on or about on or about April 14, 2022, in the County of Clay, State of Missouri, the defendant, in violation of Section 565.153, RSMo, committed the class E felony of parental kidnapping, punishable upon conviction under Sections 558.016 in that, in the absence of a court order determining rights of custody or visitation to B.M.G., the defendant, while having a right of custody of B.M.G., without good cause, concealed B.M.G., a child under the age of seventeen years, and that the defendant did so with the intent to deprive Blake Gilley of his custody right.

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 attached 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.

DANIEL L. WHITE #44584
Prosecuting Attorney of the County of Clay,
State of Missouri



By: _____
Spencer D. Curtis, MO Bar # 60645
Assistant Prosecuting Attorney
Clay County Courthouse, 11 S. Water Street
Liberty, Missouri 64068
(816) 736-8300

Witnesses:

PO Chad Flickinger, Liberty Police Department, 101 E. Kansas St., Liberty, MO 64068
A.W.G., 14304 Burrell St., Amarillo, TX 79119
Blake Edward Gilley, 143004 Burrell St., Amarillo, TX 79119
B.M.G, 14304 Burrell St., Amarillo, TX 79119
PO Hillary Harmon, Liberty Police Department, 101 E. Kansas St., Liberty, MO 64068
Jill Jones Soderman