

**IN THE CIRCUIT COURT OF PLATTE COUNTY, MISSOURI  
SIXTH JUDICIAL CIRCUIT**

STATE OF MISSOURI,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 25AE-CR00611-02
	)	and
JORDAN R. WILLIS	)	25AE-CR00612
and	)	
IVORY J. CARSON (AKA "BLADE"),	)	Div. III
	)	
Defendants,	)	

**FIRST AMENDED FELONY COMPLAINT**

Eric G. Zahnd, Platte County Prosecuting Attorney, State of Missouri and Collin S. VanOstran, Assistant Prosecuting Attorney, upon information and belief, charge that the defendant, JORDAN R. WILLIS:

**COUNT I**

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 7, 2024, in the County of Platte, State of Missouri, the defendant knowingly distributed cocaine, a controlled substance, to Clayton McGeeney, David Harrington, and Ricky Johnson, knowing that it was a controlled substance.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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.

579.020-004Y20223533.0

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Eric G. Zahnd, Platte County Prosecuting Attorney, State of Missouri and Collin S. VanOstran, Assistant Prosecuting Attorney, upon information and belief, charge that the defendant, IVORY J. CARSON:

**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 between December 2, 2023 to January 7, 2024, in the County of Platte, State of Missouri, the defendant knowingly distributed a controlled substance to Jordan Willis, Clayton McGeeney, David Harrington, or Ricky Johnson, knowing that it was a controlled substance.

The range punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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.

579.020-004Y20223523.0

Eric G. Zahnd, Platte County Prosecuting Attorney, State of Missouri and Collin S. VanOstran, Assistant Prosecuting Attorney, upon information and belief, charge that the defendants, JORDAN R. WILLIS and IVORY J. CARSON:

**COUNT III**

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 on or about January 7, 2024, in the County of Platte, State of Missouri, Clayton P McGeeney was killed by an overdose (combined fentanyl and cocaine toxicity) as a result of the perpetration of the class C felonies of Distribution of a Controlled Substance under Section 579.020 RSMo (as described in counts I and II), committed by the defendants on or between December 2, 2023 to January 7, 2024, in the County of Platte, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

565.021-003Y20200999.0

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**COUNT IV**

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 on or about January 7, 2024, in the County of Platte, State of Missouri, David Harrington was killed by an overdose (combined fentanyl and cocaine toxicity) as a result of the perpetration of the class C felonies of Distribution of a Controlled Substance under Section 579.020 RSMo (as described in counts I and II), committed by the defendants on or between December 2, 2023 to January 7, 2024, in the County of Platte, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

565.021-003Y20200999.0

**COUNT V**

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 on or about January 7, 2024, in the County of Platte, State of Missouri, Ricky Johnson was killed by overdose (combined fentanyl and cocaine toxicity) as a result of the perpetration of the class C felonies of Distribution of a Controlled Substance under Section 579.020 RSMo (as described in counts I and II), committed by the defendants on or between December 2, 2023 to January 7, 2024, in the County of Platte, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

565.021-003Y20200999.0

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**RESPECTFULLY SUBMITTED,**

**ERIC G. ZAHND  
PROSECUTING ATTORNEY**

/s/ Collin S. VanOstran  
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