

**IN THE CIRCUIT COURT OF ADAIR COUNTY, MISSOURI
ASSOCIATE DIVISION**

STATE OF MISSOURI,

Plaintiff,

vs.

JOHNATHON DAKOTA GERBER,

FILE NO: 001025255

Defendant.

Case Number:

FELONY COMPLAINT AND REQUEST FOR WARRANT

COUNT I: 573.037-002Y20203704.0 Possession Of Child Pornography - 1st Offense

The Prosecuting Attorney of the County of Adair, State of Missouri, charges that the defendant in violation of Section 573.037, RSMo, committed the class D felony of possession of child pornography, punishable upon conviction under Sections 573.037, 558.002 and 558.011, RSMo, in that on or about January 4, 2024, in the County of Adair, State of Missouri, the defendant knowingly possessed child pornography that was obscene material depicting a person less than eighteen years of age consisting of a still image (Screenshot_20231122-153604.png) showing a juvenile female wearing only a shirt with the focus of the still image being on the juvenile female's exposed genitalia.

COUNT II: 573.037-002Y20203704.0 Possession Of Child Pornography - 1st Offense

The Prosecuting Attorney of the County of Adair, State of Missouri, charges that the defendant in violation of Section 573.037, RSMo, committed the class D felony of possession of child pornography, punishable upon conviction under Sections 573.037, 558.002 and 558.011, RSMo, in that on or about January 4, 2024, in the County of Adair, State of Missouri, the defendant knowingly possessed child pornography that was obscene material depicting a person less than eighteen years of age consisting of a still image (Screenshot_20231114-020211.png) showing a juvenile female wearing only a shirt with the focus of the still image being on the juvenile female's exposed genitalia.

COUNT III: 573.037-002Y20203704.0 Possession Of Child Pornography - 1st Offense

The Prosecuting Attorney of the County of Adair, State of Missouri, charges that the defendant in violation of Section 573.037, RSMo, committed the class D felony of possession of child pornography, punishable upon conviction under Sections 573.037, 558.002 and 558.011, RSMo, in that on or about January 4, 2024, in the County of Adair, State of Missouri, the defendant knowingly possessed child pornography that was obscene material depicting a person less than eighteen years of age consisting of a still image (Screenshot_20231114-020133.png) showing a juvenile female wearing only a shirt with the focus of the still image being on the juvenile female's exposed genitalia.

The State alleges Defendant is a threat to public safety based upon the nature of the alleged offenses.

The facts that form the basis for this information and belief are contained in the attached statement of facts, 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.

/s/ David Goring

David Goring #56152

Prosecuting Attorney

County of Adair, State of Missouri