

**IN THE DISTRICT COURT OF BOURBON COUNTY, KANSAS**

STATE OF KANSAS,                      Plaintiff,

vs.

JARED RYAN QUERY  
Defendant.

**COMPLAINT/INFORMATION**

I, James Crux, the undersigned County Attorney of Bourbon County, Kansas, in the name and by the authority and on behalf of the State of Kansas, come here now and give the Court to understand and be informed that:

**COUNT I**  
**AGGRAVATED BATTERY WHILE DRIVING UNDER THE INFLUENCE**

That on or about July 20, 2025, in Bourbon County, Kansas, JARED RYAN QUERY did unlawfully commit an act described in K.S.A. 8-1567, and amendments thereto, to wit: while under the influence of alcohol to a degree that rendered the offender incapable of safely driving a vehicle, in violation of K.S.A. 8-1567(a)(3), and amendments thereto, when great bodily harm to another person or disfigurement of another person, to wit: Kendall Anne Forbes, resulted from such act. A Severity Level 5 Person Felony, in violation of K.S.A. 21-5413(b)(3)(A) & (h)(2)(C).

**Penalty Range: From a minimum of 31 months to a maximum of 136 months in prison and/or a fine of up to \$300,000 and 24 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(2), & 22-3717(d)(1)(B), and amendments thereto. The first prior adult conviction, diversion in lieu of criminal prosecution, or juvenile adjudication for the following shall count as one nonperson felony for criminal history purposes: (i) Any act described in K.S.A. 8-2,144 or 8-1567, and amendments thereto; or (ii) a violation of a law of another state or an ordinance of any city, or resolution of any county, which prohibits any act described in K.S.A. 8-2,144 or 8-1567, and amendments thereto; and each second or subsequent prior adult conviction, diversion in lieu of criminal prosecution, or juvenile adjudication for the following shall count as one person felony for criminal history purposes: (i) Any act described in K.S.A. 8-2,144 or 8-1567, and amendments thereto; or (ii) a violation of a law of another state or an ordinance of any city, or resolution of any county, which prohibits any act described in K.S.A. 8-2,144 or 8-1567, and amendments thereto, pursuant to 21-6811(c)(3)(A) & (B).**

**COUNT II**  
**DRIVING UNDER THE INFLUENCE – 3RD OFFENSE**

That on or about July 20, 2025, in Bourbon County, Kansas, JARED RYAN QUERY did unlawfully operate, or attempt to operate, a vehicle within this state while under the influence of alcohol to a degree that rendered the offender incapable of safely driving a vehicle, and the offender has two prior convictions for driving under the influence of alcohol and/or drugs, at least one of which occurred within the last 10 years, to wit: Vernon County, Missouri Case No: 04CR673398 and Mission, Kansas Municipal Court Case No: C03332. A Severity Level 6 Nonperson Felony, in violation of K.S.A. 8-1567(a)(3) & (b)(1)(D).

**Penalty Range: Not less than 90 days nor more than one year's imprisonment and fined not less than \$1,750 nor more than \$2,500. The person convicted shall not be eligible for release on probation, suspension, or reduction of sentence or parole until the person has served at least 90 days' imprisonment. The 90 days' imprisonment mandated by this subsection may be served in a work release program only after such person has served 48 consecutive hours' imprisonment, provided such work release program requires such person to return to confinement at the end of each day in the work release program. The person convicted, if placed into a work release program, shall serve a minimum of 2,160 hours of confinement. Such 2,160 hours of confinement shall be a period of at least 48 consecutive hours of imprisonment followed by confinement hours at the end of and continuing to the beginning of the offender's work day. The court may place the person convicted under a house arrest program, pursuant to K.S.A. 21-6609, and amendments thereto, to serve the 90 days' imprisonment mandated by this subsection only after such person has served 48 consecutive hours' imprisonment. The person convicted, if placed under house arrest, shall be monitored by an electronic monitoring device, which verifies the offender's location. The offender shall serve a minimum of 2,160 hours of confinement within the boundaries of the offender's residence. Any exceptions to remaining within the boundaries of the offender's residence provided for in the house arrest agreement shall not be counted as part of the 2,160 hours, pursuant to K.S.A. 8-1567(b)(1)(D) & (b)(3) and K.S.A. 21-6804(i), and amendments thereto.**

**COUNT III**  
**DRIVING WHILE SUSPENDED - 2ND OR SUBSEQUENT OFFENSE**

That on or about July 20, 2025, in Bourbon County, Kansas, JARED RYAN QUERY did unlawfully operate a motor vehicle on a highway of this state at a time when the offender's privilege to do so was canceled, suspended, or revoked and the offender has one or more prior convictions for the same offense, to wit: Bourbon County Case No: 2005-TR-1054. A Class "A" Nonperson Misdemeanor, in violation of K.S.A. 8-262(a)(1) & (3).

**Penalty Range: From a minimum of 5 days (must be served) to a maximum of 12 months in jail and a minimum fine of \$100 up to \$2,500, pursuant to K.S.A. 8-262(a)(1) & (3), K.S.A. 21-6602(a)(1), and 21-6611(b)(1), and amendments thereto.**

**COUNT IV**  
**NO PROOF OF MOTOR VEHICLE LIABILITY INSURANCE**

That on or about July 20, 2025, in Bourbon County, Kansas, JARED RYAN QUERY did unlawfully operate a motor vehicle upon a highway or upon property open to use by the public and failed to display, upon demand, evidence of financial security to a law enforcement officer having been lawfully requested to do so in accordance with the provisions of the Automobile Injury Reparations Act. A Class B Nonperson Misdemeanor, in violation of K.S.A. 40-3104(a), (d)(1), & (g)(1).

**Penalty Range: From up to 6 months in jail and/or a minimum fine of \$300.00 up to a maximum of \$1000.00, pursuant to K.S.A. 40-3104(g)(1), K.S.A. 21-6602(a)(2), and K.S.A. 21-6611(b)(2), and amendments thereto.**

**COUNT V**  
**TRANSPORTATION OF LIQUOR IN AN OPEN CONTAINER**

That on or about July 20, 2025, in Bourbon County, Kansas, JARED RYAN QUERY did unlawfully transport in a vehicle upon a highway or street an alcoholic beverage, meaning any alcoholic liquor or any cereal malt beverage, in an open container not in the original unopened package or container, the seal of which had not been broken and from which the original cap, cork, or other means of closure had not been removed; nor in the locked rear trunk or rear compartment, or any locked outside compartment which was not accessible to any person in the vehicle while it is in motion; or if the vehicle was not equipped with a trunk, behind the last upright seat or in an area not normally occupied by the driver or a passenger located in a locked outside or rear compartment of the motor vehicle which was inaccessible to the driver or passengers while the motor vehicle was in motion. An Unclassified Nonperson Misdemeanor, in violation of K.S.A. 8-1599(b) & (c).

**Penalty Range: Punishable by a fine of not more than \$200 or by imprisonment for not more than six months, or both, pursuant to K.S.A. 8-1599(c), 21-6602(a)(4), & 21-6611(b)(4), and amendments thereto.**

**ENDORSEMENT OF WITNESSES**

Reporting Officer:	Deputy Isaac Shuler
Officer:	Deputy Patrick Brazeal
Officer:	Deputy Kevin Goodrum
Evidence Custodian:	Evidence Custodian
Criminalist/Analyst:	KBI Forensic Scientist
Victim:	Kendall Anne Forbes
Witness:	Jacob Alex Gaskill
Witness:	Carina Denea Guajardo

Witness: Carson Parmentar  
Witness: Joshua Derwin Query  
EMS/Paramedic: Bourbon County EMS Personnel

I declare under penalty that the above and foregoing is true and correct. Executed on July 23, 2025.

/s/ James Crux  
James Crux, #27691  
Bourbon County Attorney  
210 S National Ave., Ste. 22  
Fort Scott, KS 66701  
(620) 223-2910  
Attorney for State