

**IN THE CIRCUIT COURT
OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

Police# 16-072704
Prosecutor# 095436837
1616-CR
OCN# AN014391

COMPLAINT

STATE OF MISSOURI

vs.

**Tyrell Howard Young
13847 E. 35th Street Court South
Independence, MO 64055
DOB: 01/04/2000; Race/Sex: B/M;
SS# [REDACTED]
Defendant.**

Count I. Murder 1st Degree (565.020-001Y19840904.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 565.020, RSMo, in that on or about September 22, 2016, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of James Hill by shooting him.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

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 September 22, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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.

Count III. Robbery 1st Degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, forcibly stole a cell phone in the possession of [REDACTED], and in the course thereof the defendant and another participant in the crime displayed and threatened the use of what appeared to be a deadly weapon and dangerous instrument.

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.

Count IV. Armed Criminal Action (571.015-001Y19755299.0)

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 September 22, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant, and another, committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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.

Count V. Robbery 1st Degree (569.020-001Y19791299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, forcibly stole a purse in the possession of [REDACTED], and in the course thereof the defendant and another participant in the crime displayed and threatened the use of what appeared to be a deadly weapon and dangerous instrument.

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.

Count VI. Armed Criminal Action (571.015-001Y19755299.0)

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 September 22, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 facts that form the basis for this information and belief are contained in the attached statement(s) 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.

THE STATE OF MISSOURI

vs.

Tyrell Howard Young

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
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trupp-stansell@jacksongov.org

WITNESSES:

[REDACTED]
DET Seth Bosch , 223 N. Memorial Drive, Independence, MO 64050
PO Maggy Chapman , 223 N. Memorial Drive, Independence, MO 64050
SGT Joseph Christiansen , 223 N. Memorial Drive, Independence, MO 64050
DET Jason Clancy , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
SGT Christopher Garcia , 223 N. Memorial Drive, Independence, MO 64050
PO Jason Gilbertson , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
PO Amanda Huffman , 223 N. Memorial Drive, Independence, MO 64050
DET Kyle Jarnagin , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
PO Roger Lane , 223 N. Memorial Drive, Independence, MO 64050
SGT Jeffery Lowe , 223 N. Memorial Drive, Independence, MO 64050
DET Scott Mckee , 223 N. Memorial Drive, Independence, MO 64050
PO Douglas Miller , 223 N. Memorial Drive, Independence, MO 64050
CST Jason Myers , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
SGT Mike Onka , 223 N. Memorial Drive, Independence, MO 64050
PO Raymond Osenbaugh , 223 N. Memorial Drive, Independence, MO 64050
SGT Carl Perry , 223 N. Memorial Drive, Independence, MO 64050
CST Dale Perry , 223 N. Memorial Drive, Independence, MO 64050
CST Kevin Phillips , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
SGT Jeffrey Rajer , 223 N. Memorial Drive, Independence, MO 64050
SGT Christopher Rapp , 223 N. Memorial Drive, Independence, MO 64050
PO Richard Remington , 223 N. Memorial Drive, Independence, MO 64050
PO Richard Romero , 223 N. Memorial Drive, Independence, MO 64050
DET Kenneth Royster , 223 N. Memorial Drive, Independence, MO 64050

[REDACTED]
PO Brett Schmidli , 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 9/28/2016

Report #: 2016-72704

I, Kyle Jarnagin, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 9/22/2016, at 2358 hours, Tyrell Young, (Race- Black, Sex- Male, DOB- 01/04/2000, Address-13847 E 35 Street Court South, Independence, Missouri, 64055, SSN- [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 09/22/2016 at approximately 2357 hours the Co-Defendant, referred hereafter as [REDACTED], and Defendant, referred hereafter as Tyrell Young, were walking west bound through the parking lot of Walgreen's (2261 S Sterling Avenue.) Both [REDACTED] and Tyrell Young contacted the three victims, later identified as [REDACTED], [REDACTED] and [REDACTED]. All three of the victims were at the time sitting on a curb at the south west part of the Walgreens building waiting for a ride. Tyrell Young brandished a black Glock 30s .45 caliber handgun with Serial # BBUS447 while [REDACTED] brandished a pink handled folding knife and demanded the three victims hand over any cell phones and/or belongings to them. [REDACTED] forcefully grabbed a purse from [REDACTED] while Tyrell Young took a white cell phone from [REDACTED]. Both [REDACTED] and Tyrell Young began to run on foot east in the direction they had come from. One of the victims, James Hill, began to chase after both [REDACTED] and Tyrell Young in an attempt to get the purse back. Tyrell Young turned towards Mr. Hill and raised his arm firing one shot from the .45 caliber Glock striking Mr. Hill in the chest. Mr. Hill dropped to the ground and remained there until paramedics arrived. Mr. Hill was transported to Centerpoint medical center where he was pronounced deceased at 0251 hours. [REDACTED] and Tyrell Young continued to run east before changing directions and running north on Claremont Street. P.O. R Lane/1344 arrived on scene while the 911 call was initiated and was advised by one of the victims that both [REDACTED] and Tyrell Young ran north. P.O. R Lane/1344 advised dispatch of the incident and a containment perimeter was initiated without delay. Dispatch requested assistance from KCPD's K9 unit who responded immediately. A K9 track was initiated in the direction that [REDACTED]. and Tyrell Young fled on foot. During the track P.O. R Remington/1367 was stationed on a perimeter at the intersection of Sterling Avenue and Winner Road and was approached by an unknown white male driving a black truck who stated he just observed two young black subjects matching [REDACTED] and Tyrell Young's description run into the apartment building located at 1719 S

Sterling Avenue. P.O. R Remington/1367 stated he responded to the area of the apartment building and was advised by an unknown white female that she observed the same black subjects run and hide in one of the laundry rooms. The female stated the two black subjects lived in apartment B at 1719 S Sterling Avenue. P.O. Remington/1367 stated he and P.O. Osenbaugh/1465 responded to the laundry room and upon exiting they were advised by a resident of the apartment complex that the two black subjects ran up the stairs and entered apartment B. P.O. R Remington/1367 stated he grabbed a ballistic shield and posted on the top floor of the apartment to ensure that no one entered or exited 1719 S Sterling Avenue Apartment B.

On 09/22/2016 at approximately 0145 hours the Independence Missouri Police Department's SWAT team was activated for 1719 S Sterling Avenue Apartment B in reference to [REDACTED] and Tyrell Young possibly being inside and being armed. Prior to SWAT's arrival on scene patrol advised dispatch that two subjects had exited the apartment after verbal announcements had been made. The subjects were identified as Tyrell Young and [REDACTED]'s mother, [REDACTED]. Three subjects were still believed to be inside. One of the subjects believed to still be inside was [REDACTED] and two of [REDACTED]'s siblings who were juveniles. SWAT requested a negotiator to respond for a peaceful resolution to the incident. Hostage negotiators attempted to have [REDACTED] exit the residence for approximately an hour with negative results. SWAT Sgt. J Lowe/1004 was provided information that the two juveniles in the residence with [REDACTED]. were possibly in imminent danger so an order was given to breach the front door. P.O. J Stauch/1361 breached the front door of the apartment and [REDACTED] was taken into custody without further incident.

The female victim, [REDACTED] was transported to the scene located at 1719 S Sterling for a field line-up prior to [REDACTED]. exiting the residence. She positively identified Tyrell Young as one of the subjects that robbed her and shot Mr. Hill. Tyrell Young was taken into custody. [REDACTED] was a person of interest on an unrelated burglary case and was also taken into custody.

CSI J Myers responded to the scene of the shooting for processing. He was able to recover a .45 caliber shell casing near where Mr. Hill was shot. CSI J Myers recovered the round. Detective KDJarnagin was advised that Walgreens had surveillance footage showing the parking lot area where the incident occurred. CSI J Myers recovered the video. Detective KDJarnagin was advised that Price Chopper (2301 S Sterling) also had surveillance video footage of the incident. Price Chopper was located directly south of Walgreens. CSI J Myers responded to Price Chopper and recovered the video.

Officers advised the Independence Police Department's holding facility to clear the jail of all adults due to both [REDACTED] and Tyrell Young being juveniles. Both subjects were booked. Immediately after booking both subjects were escorted to the investigations unit and placed in separate interview rooms while patrol officers posted outside their rooms. Both [REDACTED] and Tyrell Young were transported separately to Jackson County Juvenile Detention at 625 E 26th Street in Kansas City Missouri.

Detective KDJarnagin interviewed [REDACTED] at approximately 0600 hours on 09/23/2016 while she was at the Independence Missouri Police Department. Ms. Forte advised that [REDACTED] (her child) and Tyrell Young had left her residence on 09/22/2016 at an unknown time and returned to her residence (1719 S Sterling Avenue Apt B) sometime after midnight on 09/23/2016. [REDACTED] stated [REDACTED] owns a .45 caliber Glock Handgun that [REDACTED]'s girlfriend purchased for [REDACTED] through a third party in July of 2016. [REDACTED] stated both [REDACTED] and Tyrell had been committing several robberies in the city and she had warned [REDACTED] about it. Detective KDJarnagin asked [REDACTED] if [REDACTED] might have thrown the gun or hid the gun somewhere while they were being tracked by K9. [REDACTED] stated [REDACTED] loved that gun and would never get rid of it. She stated it would be hidden somewhere in her apartment. [REDACTED] was transported to the Jackson County Juvenile Detention by Detective KDJarnagin for an interview with [REDACTED]. Upon arrival contact was made with DJO Grimes who currently had [REDACTED] in his office. The interview took place at 0830 hours on 09/23/2016 in DJO Grimes' office. [REDACTED], [REDACTED], Detective KDJarnagin and DJO Grimes were present. [REDACTED] was read his Miranda rights by DJO Grimes. DJO Grimes was very thorough with his explanation of [REDACTED]'s rights and confirmed that both [REDACTED] and [REDACTED] understood them. [REDACTED] stated that Tyrell Young was in possession of the gun at the time of the shooting and actually told [REDACTED] while they were running that he thought he shot the victim. [REDACTED] affirmed that it was [REDACTED]'s gun but stated during the robbery Tyrell Young shot Mr. Hill. [REDACTED] stated [REDACTED] was armed with a pink handled knife and that [REDACTED] took the purse from the female victim before running away. [REDACTED] stated both he and Tyrell hid the gun in the apartment and provided Detective KDJarnagin with the exact location. Detective KDJarnagin relayed the information to detectives who were at the apartment executing a search warrant. The .45 caliber Glock 30s with serial number BBUS447 was recovered in the exact location that [REDACTED] provided which was [REDACTED]'s sister's room. [REDACTED] provided a written confession that was signed by [REDACTED], [REDACTED], DJO Grimes and Detective KDJarnagin. The written confession was scanned into the case file.

Detective KDJarnagin transported [REDACTED] back to her apartment. [REDACTED] stated she knew where [REDACTED] and Tyrell had placed some of the clothes they were wearing during the incident. [REDACTED] directed Detective KDJarnagin to 2102 S Claremont. A dark colored hooded sweatshirt with a NIKE emblem was located in the back of 2102 S Claremont. A NIKE hooded sweatshirt (worn by Tyrell during the shooting), an MU shirt (worn by [REDACTED] during the shooting), a purse (belonging to the female victim, [REDACTED]) and a pink handled knife were all located in the yard of 2102 S Claremont. These items recovered by CSI J Myers were within a few blocks of Walgreens.

On 09/26/2016 Detective KDJarnagin was contacted by Lance Sandage who stated he was representing Tyrell Young. He stated Tyrell Young's parents were in his office and that Tyrell would not be providing a statement. Tyrell Young was not interviewed.

Detective KDJarnagin

Print Name

Detective KD Jarnagin #1408

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge