

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	18-000395
PROSECUTOR NO. :	095443107

STATE OF MISSOURI,)
)
 PLAINTIFF,)
 vs.)
 TYLER J. GATES)
 2425 S. Scott Ave.,) **CASE NO. 1816-CR**
 Independence, MO - 64052) **DIVISION**
 DOB: 11/16/1999)
 Race/Sex: W/M;)
 SSN: [REDACTED])
 DEFENDANT.)

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, 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 2, 2018, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Matthew J. Haylock caused the death of Matthew J. Haylock by shooting him.

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 II. Armed Criminal Action (571.015-001Y19755213.0)

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 January 2, 2018, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second 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.

State vs. Tyler J. Gates

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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Hallie L. Williams
Hallie L. Williams (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
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WITNESSES:

Matthew J. Haylock , Prosecuting Atty. Office, Kansas City, MO - 64106
PO Amanda Huffman , 223 N. Memorial Drive, Independence, MO - 64050
DET Brice Minter , 223 N. Memorial Drive, Independence, MO - 64050
DET Erin Provost , 223 N. Memorial Drive, Independence, MO - 64050
DET Todd Winborn , 223 N. Memorial Drive, Independence, MO - 64050

PROBABLE CAUSE STATEMENT

Date: 1/3/2018

Report #: 2018-395

I, Brice Minter, 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 1/2/2018, at 2032 hours, **TYLER J. GATES**, (Race- Caucasian, Sex- Male, DOB- 11/16/1999, Address-2425 S. Scott Avenue, Independence, Missouri 64055, [REDACTED]) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

TYLER J. GATES and or referred to hereafter as the **DEFENDANT** committed the act of Murder; 2nd Degree and Armed Criminal Action by knowingly causing the death of **MATTHEW J. HAYLOCK** by shooting him one time in upper abdomen with possibly a Glock 9 mm semi-automatic handgun. The following are the supporting facts to the case:

On 01/02/2017 at approximately 2032 hours, Independence Police Officer(s) responded to 18801 E. 39th Street South (Independence Center), Independence, Jackson County, Missouri regarding a reported aggravated assault/shooting.

Upon arrival, it was determined that the victim identified as Matthew J. Haylock was located lying in the parking lot and had suffered a gunshot wound and was pronounced deceased by an American Medical Response Ambulance paramedic/EMT.

During the course of the investigation it was determined that there was a witness to the incident who was identified as [REDACTED] as he advised the following: [REDACTED] indicated that on 01/02/2018 at approximately 1900 hours, he and the **DEFENDANT** were occupying an early 2000 white unknown make/model 4-door passenger vehicle later identified as a 2003 Chevrolet Cavalier. They arrived to the victims' residence where he displayed his Glock 9 mm to the **DEFENDANT** as they all departed and eventually arrived to the area of the Independence Center in order to purchase some tennis shoes.

[REDACTED] advised that as they were stationary at an intersection light while located at the off ramp from M-291 Highway and E. 39th Street South, the **DEFENDANT** asked the victim if he could see his Glock semi-automatic handgun as the victim provided the item to him. They then proceeded to the Independence Center and continued around the outer road and reached the front entrance area to the Independence Center. The victim then requested his weapon back from the **DEFENDANT** as he advised that he would provide the item back as soon as he parked the vehicle.

As they reached the parking lot while adjacent to the north entrance area of the mall, the **DEFENDANT** acted as if he was going to park the vehicle as [REDACTED] exited from the right front passenger side of the vehicle. He further indicated that the **DEFENDANT** then retrieved the victims' Glock 9 mm from his lap area and pointed the weapon at the victim as he was positioned as the right rear passenger. The **DEFENDANT** then stated "I'm just going to tell you now this is me and fuck you".

[REDACTED] indicated that he advised the **DEFENDANT** that the victim was his friend and not to rob him as the vehicle began to pull away. [REDACTED] indicated that as he was walking behind the vehicle, he heard one gun shot and then ran up to the right front passenger door as the door was still ajar. He then observed the victim slumped over and unresponsive as the **DEFENDANT** requested his assistance by disposing the body in the parking lot as [REDACTED] refused. The **DEFENDANT** then reached across from the driver side and physically pushed the victim out of the rear portion of the vehicle as he began to fall onto the parking lot.

The **DEFENDANT** then asked the witness if he was coming with him as he refused and advised that he was contacting E-911. Detective Minter further confirmed based on a signed Consent to Search Cellular Phone form provided by [REDACTED] that he contacted E-911 at 2031 hours based on his outgoing call log. The **DEFENDANT** then departed from the Independence Center parking lot while retaining the weapon. It was later determined through the course of the investigation that Independence Police Officer Steele was getting ready to initiate a traffic stop on a white 2003 Chevrolet Cavalier but disengaged as Officer Virgil advised that he possibly had located the suspect vehicle in a different location.

It was later determined that the white Chevrolet Cavalier that Officer Steele was initially going to stop was the suspect vehicle as it was located at 3704 S. Randall while unoccupied. A search warrant was obtained that revealed an unknown red substance located in the right rear passenger seat that was presumed to be blood along with a Glock 26 and Glock 9 mm semi-automatic handguns located in the right front passenger seat.

It was later determined as a secondary interview was conducted with [REDACTED] that he provided the **DEFENDANT** with the Glock 26 containing an extended magazine for protection as [REDACTED] had his residence shot at dated on 01/01/2018. He further advised that his last known knowledge of where the weapon was located inside the vehicle was "tucked" away around the driver side.

On 01/03/2018, Detective Aaron Gietzen conducted a formal interview with [REDACTED] and or the **DEFENDANT'S** mother while located at Independence Police Headquarters. She further indicated that she contacted the **DEFENDANT** at 2039 as he immediately requested her to retrieve him as he was in a frantic state. Mrs. [REDACTED] advised that she was originally contacting the **DEFENDANT** because she had received information that the residence to where the **DEFENDANT** and [REDACTED] were residing had been shot at, so she was worried about him and began trying to make contact. So as she made contact, she indicated that originally she could not understand him and was eventually advised that he was in an altercation and needed her to retrieve him as he pinged her phone with his GPS location. She further indicated that at 2054 hours, she had retrieved the **DEFENDANT** while he was located in an unknown neighborhood behind an RV.

As she transported the **DEFENDANT** back to her parent's residence, he advised her that he had gotten into an altercation in Independence and stated "I shot him mom". She further indicated that as the **DEFENDANT** made the previous statement, the news broadcasted a live breaking story at the Independence Center. Once the **DEFENDANT** observed the news broadcast, he stated to Mrs. [REDACTED] that he "fucked his life up" and asked why he did this. He further insinuated to Mrs. [REDACTED] that he and [REDACTED] and another unknown subject were meeting unknown person(s) at the Independence Center in order to "squash everything" regarding the **DEFENDANT'S** house getting shot at. He advised that an unknown subject had entered into the passenger side of his vehicle and the unknown subject tried to "merc" (?) him. The **DEFENDANT** further advised that the unknown subject tried to strike him in the head with the pistol and the next thing he knew was that he "heard it" and the unknown subject was shaking as the **DEFENDANT** then pushed him out of the vehicle. Mrs. [REDACTED] reiterated her statement again as to what the **DEFENDANT** advised her as he stated that he and [REDACTED] met two unknown subjects at the Independence Center and a scuffle ensued and that he "shot him" and pushed him out of the vehicle.

As Mrs. [REDACTED] attempted to converse with the **DEFENDANT** while on speaker phone while at Independence Police Headquarters and pleaded with him to turn himself into the police; he asked her who had come to the house as she responded and stated that the SWAT team came to house. The **DEFENDANT** then stated "then that means [REDACTED] snitched then I'm going to kill him to". The **DEFENDANT** then terminated the conversation with Mrs. [REDACTED].

Detective Brice Minter

/s/ Brice Minter

Print Name

Signature