

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

POLICE NO. :	22-004035
PROSECUTOR NO. :	095468312
OCN:	QO007710

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JOSHUA A MONGOLD)	
1528 North Geronimo Drive)	CASE NO. 2216-CR
Independence, MO 64058)	DIVISION
DOB: 06/30/1987)	
Race/Sex: W/M)	
)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted
Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y20200999.0)**

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 January 20, 2022, in the County of Jackson, State of Missouri, Riley M Youngblood was killed by being shot as a result of the attempted perpetration of the class B felony of unlawful use of weapon under Section 571.030, RSMo committed by the defendant on or about January 20, 2022, in the County of Jackson, 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.

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Count II. Armed Criminal Action (571.015-001Y20205299.0)

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 20, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count one, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class B felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about January 20, 2022, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a motor vehicle, a 2020 silver Chevrolet Silverado.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

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Count IV. Armed Criminal Action (571.015-001Y20205299.0)

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 20, 2022, in the County of Jackson, State of Missouri, the defendant is guilty of the felony of unlawful use of weapon charged in Count three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of weapon by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Jeremy J. Baldwin

State vs. Joshua A Mongold

Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
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(816) 881-4592
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WITNESSES:

1. DET Steven Breshears, 223 N. Memorial Drive, Independence, MO 64050
2. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050
3. DET Logan Waterworth, 223 N. Memorial Drive, Independence, MO 64050
4. PO Erin Wildman, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 2/11/2022

Report #: 2022-004035

I, Christopher Burris, 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 1/20/2022, at approximately 0805 hours, Joshua A. Mongold , (Race- WHITE, Sex- MALE, DOB- 06/30/1987, Address-1528 North Geronimo Drive, Independence, Missouri 64058, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 01/20/2022 around 0805 hours Independence Police Officers were dispatched to U.S. 40 Highway and South Valley View Road, regarding a truck that had been stopped in the middle of the road with a man slumped over the wheel. [REDACTED] noticed the driver's window appeared to have bullet holes and the driver was slumped over the steering wheel. The driver had apparent blood on his head and neck. [REDACTED] said the driver was unresponsive and after she reentered her vehicle the truck began rolling east toward her where its side swiped her car and came to a rest in a wooded median off the highway.

Officers arrived and discovered the driver, Riley Youngblood, slumped over the wheel of a 2020 silver Chevrolet Silverado. Officers observed Youngblood suffering from apparent gunshot wounds. Youngblood was transported for emergency medical treatment. On 01/24/2022, Youngblood was pronounced deceased. The Jackson County Medical Examiner Office ruled Youngblood's death as a homicide.

The initial investigation revealed Youngblood was involved in what appeared to be a road rage incident with another motorist at the intersection of southbound Little Blue Parkway and U.S. 40 Highway at approximately 0758 hours on 01/20/2022. The suspect was observed via surveillance cameras in the area, operating a dark gray 2004 Chevrolet Silverado 2500 extended cab truck. The truck had a bed mounted toolbox and "4x4" decals over and just behind the rear wheels. In further review of the business' surveillance video in the area, investigators observed Youngblood and the suspect vehicle both turn east onto U.S. 40 Highway. Youngblood appears to abruptly change lanes right in front of the suspect vehicle. The suspect vehicle then appears to crash into the rear of Youngblood's truck. Both trucks then speed away to the east, side by side with Youngblood in the outside lane and the suspect vehicle the inside lane.

Youngblood was found around approximately a third of a mile east of the road rage incident by [REDACTED], because he was stopped in the middle of U.S. 40 Highway. Surveillance video along eastbound U.S. 40 Highway was reviewed. After the initial incident in the intersection both trucks were observed still side by side and travelling east around at approximately 0759 hours. The suspect vehicle was seen with its passenger side window down and driving next to Youngblood's truck just prior to him being found by [REDACTED], Youngblood's truck appears to be slowing and the suspect vehicle appears to be accelerating. On the day of this incident, the exterior temperature was approximately 8 degrees Fahrenheit, not factoring windchill.

On 01/21/2022, an investigative tip revealed a vehicle matching the description of the suspect vehicle had been parked [REDACTED] 40 Highway, Blue Springs, Missouri 64015 an auto body repair business. The truck in the tip appeared to be the same dark colored truck observed during initial incident to include the year, make, model, color, toolbox, and decals. Further investigation revealed the dark colored truck from the tip was registered to Joshua Mongold who lived at 1528 North Geronimo Drive, Independence, Missouri 64058.

Management at [REDACTED] verified that they employed Joshua Mongold and he worked at [REDACTED] 40 Highway, Blue Springs, Missouri 64015. It was noted that the business was east of and around 1.3 miles from where Youngblood had been found. Mongold was found to have a 2004 Chevrolet Silverado 2500 Extended Cab pickup truck which was dark gray, registered to him.

Surveillance video of [REDACTED] 40 Highway that was taken from 3108 U.S. 40 Highway, showed the

suspect vehicle pulling into the [REDACTED] parking lot and parking around 0802 hours. Several surveillance videos from businesses west of the [REDACTED] the suspect vehicle coming from the same area (eastbound). From Little Blue Parkway and 40 Highway to [REDACTED] the drive, when driving the speed limit is approximately four minutes travel time. The suspect vehicle is seen on surveillance passing other vehicles at a high rate of speed.

What appears to be the sole occupant of the suspect vehicle was seen exiting the suspect vehicle and entering the building. No one else exits the suspect vehicle. Approximately three minutes later at 0805 hours, the suspect is seen exiting the building, entering the suspect vehicle and pulling the truck around to the back of the building. During the investigation, the owner of [REDACTED] said the alarm was deactivated at 0803 hours with the general code used by all employees. [REDACTED] who worked in the [REDACTED] reported he was the second person who arrived at work on 01/20/2022 at approximately 0812 hours and Mongold was already there working alone. [REDACTED] recalled Mongold's truck was parked behind the business, which was unusual, because Mongold usually parked in front of the business. [REDACTED] described Mongold's truck that day as a dark colored Chevrolet, heavy-duty, four-wheel drive truck with "4x4" decals on the bed of the truck. [REDACTED] said the wheels were painted black and the Chevrolet emblem was a green and black design. [REDACTED] reported that Mongold drove this truck frequently but was also known to drive a newer black in color GMC Sierra.

On 01/25/2022, investigators with the Independence Police Department Street Crimes Unit, conducted surveillance at Mongold's residence 1528 North Geronimo Drive, Independence, Missouri. At about 0730 hours, investigators observed a truck leave the residence. The truck was a black GMC Sierra. A computer check of the license plates on the Sierra revealed the truck was also registered to Mongold. Mongold took 24 Highway to Little Blue Parkway. Once on Little Blue Parkway, Mongold drove all the way down to Heartland Drive and turned to continue east to Valley View Road. Mongold then traveled to 40 Highway where he turned eastbound on 40 Highway, arriving at the [REDACTED] location around 0800 hours, subsequently exiting the truck and entering the business. Investigators looked for Mongold's 2004 Chevrolet Silverado 2500 at the business and at Mongold's residence, but it could not be located.

At stop order was issued for Mongold due to the suspect vehicle matching one owned by him and surveillance video along portions of the route, corroborating that Mongold drove to work on 01/20/2022 in his 2004 Chevrolet Silverado.

At about 1500 hours, Mongold was taken into custody by members of the Independence Police Department SWAT team and U.S. Marshall's task force officers. At approximately 1516 hours, Detectives Burris and Breshears interviewed Mongold after he was advised of his Miranda rights. Mongold confirmed he worked as an automobile painter [REDACTED] and worked at [REDACTED] 40 Highway, Blue Springs, Missouri location. Mongold confirmed that he did in fact work on 01/20/2022 and that his hours were Monday thru Friday 0730 – 1700 hours. Mongold said that on 01/20/2022 he drove to work via southbound Little Blue Parkway and eastbound on 40 Highway, which is where this incident began. Mongold denied anything unusual happening that day. When asked about the route he took on 01/25/2022 (which had been surveilled earlier in the day), Mongold lied about the route he took. Mongold said he took southbound Little Blue Parkway to I-70 before turning onto Woods Chapel. When questioned about the inconsistency Mongold requested a lawyer prior to any further questioning.

Also, on 01/25/2022, investigators made contact with Mongold's father, Patrick Mongold. Patrick claimed to not have any details involving this case but told investigators that Mongold did in fact own handguns and rifles and that he had not talked to Mongold since December.

On 01/26/2022, investigators contacted [REDACTED] and interviewed him. James denied knowledge of the incident but said Mongold's truck was at their property in Cross Timbers, Missouri. [REDACTED] told investigators that Mongold took his truck there because he was having problems with it. Investigators with the assistance of the Hickory County, Sheriff's Office, located the suspect vehicle in a wooded area, visible from a county road. The suspect vehicle was recovered pursuant to a search warrant in Hickory County, Missouri and transported back to the Crime Scene Processing Bay at 875 Vista Avenue, Independence, Missouri. The truck matched the description of the suspect vehicle previously described. The truck was a dark gray 2004 Chevrolet Silverado 2500 Extended Cab bearing Missouri license 0KCZ82, with damage on the front bumper consistent with

having been involved in a vehicle crash previously outlined herein. The toolbox was no longer in the bed of the truck when it was recovered. The vehicle was discovered approximately 126 miles away or an approximate two hour and thirteen-minute drive from 1528 North Geronimo Drive on land owned by Mongold and his [REDACTED]. The property itself, where the vehicle was located could best be described as several acres of wooded land for hunting with no apparent facilities for vehicle repair.

On 01/26/2022 [REDACTED] [REDACTED] /2022. [REDACTED] reported that Mongold drove his dark gray 2004 Chevrolet 2500 truck to work up 01/20/2022 and hadn't drive it since. [REDACTED] stated Mongold had been driving his 2017 GMC truck since. [REDACTED]'s statements were supported by video surveillance evidence from 3108 U.S. 40 Highway. [REDACTED] said that on 01/24/2022, Mongold told him that his 2004 Chevrolet Silverado 2500, was "out of commission." [REDACTED] also said that Mongold told him that he went to church this past Sunday and "found GOD."

Mongold's 2017 GMC Sierra was recovered pending a search warrant. Search warrants for both of Mongold's trucks (2004 Chevrolet Silverado / 2017 GMC Sierra). Upon execution of the search warrants, it was apparent the 2004 Chevrolet Silverado had been painted a dark primer gray color. Investigators observed a piece of orange masking tape on weatherstripping on the rear passenger side door. The paint job appeared to have been hastily done due to fact there was over-spray on the license plates, taillights, and bed liner. The green and black Chevrolet emblem had also been painted black. The 4X4 stickers on the bed of the truck had also been removed.

A search of the 2017 GMC Sierra revealed there was a Glock 27 .40 caliber pistol (S/N RES609) in the top glove box, which had been locked. The pistol was fully loaded with .40 caliber hollow point bullets. A second magazine with nine rounds of .40 caliber hollow point bullets was found in the center console.

The Glock 27 .40 caliber pistol (S/N RES609) was submitted to the KCPD Crime lab to conduct a comparison examination of the firearm with that of two bullets recovered in relationship with this case. One bullet was recovered from the victim's skull during the autopsy and the other was recovered from the victim's truck. The examination concluded that both bullets were .40 caliber class bullets, and both were fired from the Glock 27.40 caliber pistol (S/N RES609).

Detective Christopher Burris # 1401

/S/ Christopher Burris

Print Name

Signature