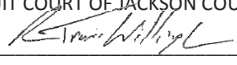


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC24009897
PROSECUTOR NO. :	095478296
OCN:	

FILED
DIVISION 26
21-Mar-2024 10:33
CIRCUIT COURT OF JACKSON COUNTY, MO
BY  DCA

STATE OF MISSOURI,)
)
) **PLAINTIFF,**)
)
 vs.)
)
)
)
 TERRY J YOUNG)
 5312 Perismmon Trail)
 Kansas City, MO 64130)
 DOB: [REDACTED])
 Race/Sex: B/M)
 S.S.N.: [REDACTED])
)
 DEFENDANT.)

CASE NO. 2416-CR
DIVISION

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 on or about February 14, 2024, in the County of Jackson, State of Missouri, CONFIDENTIAL VICTIM was killed by being shot as a result of the perpetration of the class B felony of Unlawful Use of a Weapon under Section 571.030, RSMo, committed by the defendant on or about February 14, 2024, 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.

Count II. Armed Criminal Action (571.015-001Y20205213.0)

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 on or about February 14, 2024, 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 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 (571.030-020Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of 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 February 14, 2024, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at a crowd of people.

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.

Count IV. Armed Criminal Action (571.015-001Y20205213.0)

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 on or about February 14, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a 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.

State vs. Terry J Young, Case No.

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/ Kristiane N. Bryant

Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St.
Floor 7M
Kansas City, MO 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

The State's witnesses as of 3/21/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 03-20-2024

CR#: KC24009897
FILED
DIVISION 26
21-Mar-2024 10:27
CIRCUIT COURT OF JACKSON COUNTY, MO
BY [Signature] DCA

I, Det. Grant Spiking #5484, Kansas City, Missouri Police Department
(Name and identify law enforcement officer, or person having information as probable cause.)

knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

I have probable cause to believe that on 02-14-2024, at West Pershing Road & Kessler Road in
(Date) (Address)

Kansas City, Jackson County Missouri Terry Young
(County) (Name of Offender(s))

a black male committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 02-14-24, officers with the Kansas City, Missouri Police Department were working at the Kansas City Chief's Super Bowl Parade, located at 30 West Pershing Road, Kansas City, Jackson County, Missouri 64108. At approximately 1349 hours, officers responded to sounds of shots near West Pershing Road & Kessler Road. Twenty-Five victims, suffering from apparent gunshot wounds, were either located at the scene or at area hospitals. A 43-year-old female, who was among these victims, succumbed to her injuries and her death has been ruled a homicide by the Jackson County Medical Examiner's Office.

Detectives reviewed surveillance video from the area of West Pershing Road and Kessler Road. In the video, a person, wearing what appears to be a red windbreaker jacket, is observed talking on his cellphone. Several feet away, another group of individuals (later identified as [REDACTED] and two other individuals – Group 1) appear to be staring at the individual wearing the red windbreaker jacket. Approximately 10 seconds later, **Terry Young** and two other individuals walk up next to the individual wearing the red windbreaker jacket (Group 2) and they all stare at Group 1. A verbal argument between the groups begins. Another individual then joins Group 2. At that time, [REDACTED] and another individual from Group 1, approach Group 2 and appear to get into a verbal argument. Approximately seven (7) seconds later, three other individuals start approaching Group 2. One of the individuals, from Group 2, starts to back up and removes the backpack he is wearing. Other members of Group 2 start to back up as well. One individual from Group 2 briefly backs up, then positions himself in a crowd of people, several feet away to the side of [REDACTED] and Group 1, as if taking up a strategic position, while still watching the verbal argument between Group 1 and Group 2. Shortly after taking up that position, [REDACTED] produces a firearm and starts to advance on an individual associated with Group 2. As [REDACTED] is chasing that individual, with his firearm pointed at him, **Young** pulls out a firearm, with his right hand, and points it at and advances towards [REDACTED]. The individual wearing the red windbreaker jacket, in Group 2, stood in front of **Young** (standing in between **Young** and [REDACTED]). From behind the individual in the red windbreaker jacket, **Young** appears to shoot several times in [REDACTED] direction, shooting with one hand. As **Young** is shooting at [REDACTED] several bystanders can be seen around and behind [REDACTED] **Young** then flees the area on foot. In the surveillance

PROBABLE CAUSE STATEMENT FORM

CRN KC24009897

video, **Young** can be seen wearing a very distinct backpack, that appears to be a bear, that is half green and half yellow, and other colors. In surveillance video, **Young** appears to have long dreads as well.

Detectives obtained a consent to search for a cellphone that was recovered from one of the shooting suspects that had been shot and was at an area hospital. The data and content was extracted from the cellphone. KCPD Analysts reviewed the data and located a group chat that showed a contact with the name "Terry" with a phone number of [REDACTED]. In the group text, "Terry" was involved in a group discussion in the immediate aftermath of the parade shooting. "Terry" also mentioned deleting the group chat and that they'd make a new one. This phone number is also linked to a Cash App account with a username of [REDACTED]. A search of public Facebook pages with [REDACTED] revealed a page of a subject living in Kansas City, Missouri. A post on [REDACTED] shows a #HappyBirthday2Me post indicating he is 20-years old. A search in Niche RMS with a first name of "Terry" and a birthday of [REDACTED] shows a Terry J. Young B/M, [REDACTED], whose booking photo resembled the same person from the Facebook page. A search on YouTube account for [REDACTED] revealed a video named [REDACTED] that was posted January 18, 2024. In the YouTube video, a person appearing to be **Young** from the parade, is seen wearing the same, unique green teddy bear backpack as the one seen on Union Station and Crown Center surveillance videos. He is also seen as having the same type of long dreads. Several of the other subjects in the YouTube video have been identified being as being involved in the parade shooting as well.

Another cellphone was recovered from a suspect at the scene and a search warrant was granted to access the data from the cellphone. KCPD Analysts located the same aforementioned group text from the data on the cellphone. The number [REDACTED] was involved in a group chat on 02-14-24 at 1408 hours in which one of the individuals in the group chat stated, "I dropped dat nigga first shot."

Detectives obtained a search warrant for the cell data associated to cellphone number [REDACTED]. The data revealed the subscriber to be "Terry Young" with an active account since 07-12-23. Location data revealed the device to be in the area of the parade shooting when it occurred. The location data also revealed the device to frequently be in the area of [REDACTED], Kansas City, MO, which is an address associated to Terry Young in LexisNexis Accurint (an online database utilized by law enforcement).

A search warrant was obtained for the Cash App account with username [REDACTED]. On 03-07-24, detectives received the data from the Cash App account. The data revealed the account to belong to **Young**. The data also included a photo of **Young's** Missouri driver's license.

Detectives obtained a search warrant for the Facebook account with username [REDACTED]. The data from the Facebook account listed two cellphone numbers associated to the account, one being [REDACTED]. Detectives located what appeared to be the same rap video from YouTube that appears to show **Young** wearing the same distinct green bear backpack as is seen in the parade shooting surveillance video. Detectives located numerous videos that appear to be **Young** with firearms and with other individuals involved in the parade shooting. Detectives also located a picture of **Young's** social security card. There were also videos of what appeared to be **Young** wearing the same black "fuzzy" type hat as what was located at the parade shooting scene. I observed a chat between [REDACTED] and another individual. [REDACTED] sent a message on 2-16-24 asking if they were standing with them at the parade. The individual responded, "yeaaa & no the one with the

PROBABLE CAUSE STATEMENT FORM

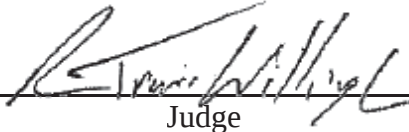
CRN KC24009897

ski." [REDACTED] responded, "That's my lil brudda [REDACTED], they kall him dooder tho" "My nigga locked up rn, u tryna get put on tho." [REDACTED] was one of the individuals taken into custody at the parade shooting scene.

Detectives obtained a pen register/trap and trace warrant for the phone number [REDACTED]. On 03-20-24, **Young** was arrested and was in possession of that phone device.

Printed Name /s/ Det. Grant Spiking #5484 Signature /s/ Det. Grant Spiking #5484

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.



Judge

Circuit Court of _____ County, State of Missouri.