

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

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| POLICE NO. : | 17-013968 |
| PROSECUTOR NO. : | 095438063 |

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|--------------------------------|---|-------------------------|
| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| TANYA L. STARR |) | |
| 3309 Jackson Ave., |) | CASE NO. 1716-CR |
| Kansas City, MO - 64128 |) | DIVISION |
| DOB: 11/05/1972 |) | |
| Race/Sex: B/F; |) | |
| SSN: XXX-XX-9776 |) | |
| |) | DEFENDANT. |

COMPLAINT

Count I. Murder 2nd Degree - Felony Murder - During Perpetration/attempted Perpetration/flight From Perpetration Of A Felony, A Person Dies (565.021-003Y19840999.0)

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 24, 2017, in the County of Jackson, State of Missouri, Leroy Farris was killed by being shot as a result of the perpetration of the class C felony of assault in the second degree under Section 565.053, RSMo committed by the defendant on or about February 24, 2017, 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 (571.015-001Y19755213.0)

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 February 24, 2017, 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

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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 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.

Count III. Assault - 2nd Degree (565.052-001Y20171314.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.052, RSMo, committed the class D felony of assault in the second degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 24, 2017, in the county of Jackson, State of Missouri, the defendant recklessly caused serious physical injury to [REDACTED] by shooting him.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count IV. 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 February 24, 2017, in the county of Jackson, State of Missouri, the defendant committed the felony of assault in second degree charged in Count Three, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in second 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.

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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/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
415 E. 12th Street, Fl 7M
Kansas City, MO - 64106
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jbaldwin@jacksongov.org

WITNESSES:

[REDACTED]
[REDACTED]
[REDACTED]
DET David D. Kissee , 1125 Locust, Kansas City, MO - 64106
DET Heather D. Leslie , 1125 Locust, Kansas City, MO - 64106
DET Timothy M. Perry , 1125 Locust, Kansas City, MO - 64106
PO Christopher J. Theison , 1125 Locust, Kansas City, MO - 64106
[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 0225/2017

CRN: 17-13968

I, Detective Heather Leslie #5194 (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 02/24/2017, at 2526 Bellefontaine in (Date) (Address)

Kansas City, Jackson Missouri Tanya L. Starr (County) (Name of Offender(s))

B/F 11/05/1972 SSN [REDACTED] committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows:

On 02-24-2017, officers of the Kansas City Missouri Police Department were dispatched to 2526 Bellefontaine, Jackson County, Kansas City, MO in regard a shooting. Two victims were transported to Truman Medical Center with gunshot wounds. Victim#1 was shot in the left shoulder and Victim#2 was shot in the head. Victim #2 died at Truman Medical Center on 02-25-2017 at 1345 hrs. The Jackson County Medical Examiner's office ruled the cause of the death as homicide from a gunshot wound to the head.

Officers contacted Witness #1, wife of the deceased victim, who stated people were over and everyone was drinking and playing games. She said [REDACTED], (Tanya STARR (B/F 11-05-1972) was in the front room with several other people when an argument between STARR and Victim#1 ([REDACTED] B/M 09-10-1977) over STARR's missing car keys started. Witness#1 stated she heard a gunshot and saw STARR waving a gun around and saw that [REDACTED] had been shot and so had her husband, Victim#2. She stated the gun STARR had come from one of her nephews.

Witness#2 responded to East Patrol, to turn in a gun and witness #2 stated that he was at his uncle's house (victim#2) and several other people were there. STARR took his gun (a Glock 23, Serial #YFB123) from a holster on his waist. He saw STARR was extremely upset with "the other guy who got shot" (Victim#1, [REDACTED] B/M, 09-10-1977). He said STARR got face to face arguing with [REDACTED]. He tried to break up the argument. He then saw STARR swing the Glock and struck [REDACTED] with it and it went off. He grabbed the weapon from STARR and saw that [REDACTED] was bleeding He left and immediately emptied the gun and then went to his house where he intentionally dropped the Glock into the toilet, when asked if that to clean the gun off, he said "yes". He stated once he found out today that his uncle had been shot and died, he drove to East Patrol Division to turn in the Glock. Detectives followed him to his home, where they recovered the 13 rounds and 1 spent shell casing from a vehicle parked at his house.

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Detectives contacted STARR by telephone on the number she provided during the first of the investigation where she was listed as a Witness. STARR told the detective that she was scared and that "it was an accident, I didn't mean to do it". STARR told the detective that she was going to contact an attorney and turn herself in.

Tanya STARR responded to 2640 Prospect Ave and turned herself in at 1614hours. STARR was booked in at East Patrol Detention Facility and then transported by detectives to Police Headquarters.

STARR was escorted into Interview Room #4 (718) and the interview began at 1844hrs. STARR was read the Miranda Waiver Form 340 P.D. at 1844 hrs and signed the wavier at 1845hrs agreeing to talk to detectives.

STARR stated she went to her Aunt and Uncle's house around 6-7 P.M. When she arrived there were several people there including [REDACTED]. Throughout the night she stated [REDACTED] had been bothering her, following her around, calling her names and arguing with her. She and [REDACTED] had been romantically involved in the past but haven't been since November of 2016. STARR stated she was going to leave with her nephew (Witness#2). She went to the restroom and when she came out, she saw that her bottle of liquor and car keys were no longer on the table where she put them. She started arguing with [REDACTED] about her missing keys and as the argument went on she said [REDACTED] moved in closer at which time she asked Witness #2 for his gun. She took the gun and went to hit [REDACTED] with it when it went off. She saw that [REDACTED] had been shot in the shoulder. She stated Witness #2 took the gun and told her to look over at "Unc" (Victim#2) and when she did, she saw that her Uncle Leroy had been hit. She didn't know how he got shot since the gun only went off once. Once the police were at the house, she was scared so she left with everyone else and went to the hospital. She left the hospital and then turned herself into the police.

Printed Name Det. Heather Leslie Signature \s\Det. Heather Leslie

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

Judge

Circuit Court of _____ County, State of Missouri.