

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-003684
PROSECUTOR NO. :	095439434

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
DERON E. BANDY)	
907 NW Berkshire Drive,)	CASE NO. 1716-CR
Blue Springs, MO - 64015)	DIVISION
DOB: 07/18/1999)	
Race/Sex: B/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Burglary 1st Degree (569.160-001Y19792299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about May 11, 2017, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, knowingly entered unlawfully in an inhabitable structure, located at 2914 NW 3rd St. Terr, Blue Springs, MO and possessed by [REDACTED], for the purpose of committing Stealing therein, and while in immediate flight from such an inhabitable structure the defendant or another participant in the crime was armed with a deadly weapon.

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 II. Stealing - Firearm/explosive Weapon/ammonium Nitrate (570.030-037Y20172399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo,

State vs. Deron E. Bandy

committed the class D felony of stealing, punishable upon conviction under Section(s) 558.011 558.002 and 558.011), RSMo, in that on or about May 11, 2017, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, appropriated a Ruger 9mm, a firearm, which property was in the possession of [REDACTED], and defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof

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.

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/ Traci A. Stansell
Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050
(816) 881-4591
trupp-stansell@jacksongov.org

WITNESSES:

[REDACTED]
[REDACTED] Keating , 1100 SW Smith, Blue Springs, MO - 64015
[REDACTED]
[REDACTED]

PROBABLE CAUSE STATEMENT

Date: May 12, 2017

Police Complaint Number: 2017-03684

I, Detective Kenneth Keating, a Police Officer for the City of Blue Springs, Missouri, 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 **05-11-2017** at approximately 1035 to 1133 hours at **2914 NW 3rd Street Terrace**, Blue Springs, Jackson County, Missouri 64014, **Deron E. Bandy B/M 07-18-1999**; Javonte M. Tiger B/M 09-11-1998; and [REDACTED] B/M 05-16-2000 (Juvenile) committed one or more criminal offense(s).

2. The facts supporting this belief are as follows:

At the above date, time and location officers were dispatched on multiple shots fired in the area. Upon arrival officers found three white males exiting the residence of 2914 NW 3rd St. Terr and they were placed in custody until the scene was secured. The three white males immediately advised there were three black male suspects that fled the scene prior to the police arrival. One of the white males that exited the residence was identified as the neighbor at 301 NW Sherwood Drive named [REDACTED]. [REDACTED] advised he saw a black male wearing a dark blue sweatshirt, dark jeans, red stocking cap, skinny, white eyes, lighter skin and approximately 18 years old knock on his neighbors backdoor. [REDACTED] stated the B/M asked if "Stephen" was home and that he had come to get a computer. Mr. [REDACTED] told him to go around and knock on the front door and he advised he would later see this suspect "float" back and forth from the front yard to the back yard. Mr. [REDACTED] advised he heard a "pop." Mr. [REDACTED] then went into his son's room and grabbed a Ruger American 45 caliber handgun, seated the magazine and chambered a round. Mr. [REDACTED] advised he heard voices and went downstairs to his garage where he saw two B/M exited his neighbor's residence. Mr. [REDACTED] advised one suspect was a B/M in his later teens little stockier than the other two wearing black hoodie, dark pants, black shirt carrying the black rifle case and the other B/M was approximately 18 years old, dark skinned, medium face, wearing dark blue hoodie with the hood down and jeans. Mr. [REDACTED] believing the suspects had shot his neighbor confronted the suspects with the handgun and advised he shot approximately seven rounds at the suspect in the all black clothing carrying the rifle case and the suspect with the hoodie down. Mr. [REDACTED] stated he did not see the suspect with the red stocking cap as he was shooting at the other two suspects.

Witnesses in the area advised they heard multiple gunshots, saw three young black males wearing dark clothing, one carrying a zip up gun case running down the street. Witnesses also stated seeing a gold in color Jaguar car leaving there area where one witness followed him for a short amount of time. Another witness, [REDACTED], advised

he heard the shooting, saw a B/M approximately 5'7 with thick glasses wearing a hoodie ran by him and asked him "what do I do?" before getting into a gold in colored Jaguar and leaving the area. Mr. [REDACTED] stated he then saw the other two suspects, both wearing hoodies with one carrying a black nylon gun case look around, believed to be looking for the other suspect in the car, before running down an ally way towards the Casey's convenience store. Mr. [REDACTED] advised he got into his truck and drove to Casey's wear he observed the two B/M he had just seen running, taking off their clothes before running west across MO 7 HWY. Mr. [REDACTED] advised they no longer had the gun case and now both were wearing possibly shorts and one had a white shirt while the other he believed might not have had a shirt on. Detective Keating recovered a pair of jeans and dark colored sweatshirts in the bushes near Casey's.

Officers converged in the area and officers observed two B/M jogging southwest through the grassy area near 717 NW Park Rd (James Lewis Elementary) just across from Casey's. Officer Nick Webber advised one was wearing a black shirt and pants and the other wearing a white shirt and white headband. They both were walking towards the school where the one in black t-shirt was near the school while the one in white began to run further towards Park Rd. Officer Webber ran towards both parties and the B/M in all black, later identified as Mr. Javonte Tiger laid down and surrendered to Sergeant Matt McLaughlin. The other suspect continued to run through the fields in the area. As a perimeter was established, the officers closed in where they found Mr. Devon Bandy nearby, hiding underneath a car and he was taken into custody.

Grain Valley Police Officer Danny Iiams contacted our department with a tip where he advised he believed he knew who the Gold in colored Jaguar belonged to. Officer Iiams advised the car come back to a juvenile in Grain Valley named [REDACTED] B/M 05-16-2000. Blue Springs Officers went to [REDACTED]'s residence and observed the gold in colored Jaguar in front of the residence. While speaking to the homeowners, one of the residents called her dad and asked if [REDACTED] was with him and he stated yes. Sergeant Mike Russell spoke to the male party and he agreed to have [REDACTED] turn himself into the Blue springs Police Department. Detective Keating walked through the 2914 NW 3rd Street Terrace residence the homeowner/victim, [REDACTED] [REDACTED], advised he discovered a backpack inside his residence that was not his. Upon further inspection he advised the suspects was using the bag to place items from his residence inside the bag. At the bottom of the backpack was a green "Officer Request" paper from 05/05/2017 from Teacher" Howard, Room: 507 with a note saying "Please send [REDACTED] to the high school office." Mr. [REDACTED] advised during the residence check he found his Ruger 9 mm hand gun (Serial 312-90587); Mak-90 rifle (serial 25086) and a Russian M-44 7.62 X 54 (unknown serial) rifle with hard case missing. Officers later recovered the MAK-90 rifle with the soft nylon case. The other two guns have not been recovered despite an extensive K-9 article search.

Detective Keating asked Mr. Deron Bandy if he wished to speak with him and he advised yes. Detective Keating had Mr. Bandy sign a Miranda waiver and he spoke with me. Mr. Bandy advised he was sleeping when [REDACTED] picked him up in his gold in color Jaguar. In

the front passenger seat was Mr. Javonte Tiger and Mr. Bandy got in back. Mr. Bandy advised [REDACTED]. advised someone with the name "V" owed [REDACTED] some money and they drove to the house. Mr. Bandy advised he was the "lookout" and sat out in the car for approximately 45 minutes. Mr. Bandy advised [REDACTED]. and Mr. Tiger exited the residence and then told him to run so Mr. Bandy ran. Mr. Bandy advised as they were running someone was shooting at them. Mr. Bandy advised he was running with Mr. Tiger who he advised was carrying the black nylon gun case. Mr. Bandy advised they ran by a guy in a grey truck ([REDACTED]) and Mr. Tiger ditched the gun and they ran to Casey's, shed their clothing and ran across the highway. Mr. Bandy advised he hid under the car before being located and arrested by police. Mr. Bandy denied being inside the residence and advised when they picked him up he didn't know their intentions.

Detective Keating asked Mr. Javonte Tiger if he wished to speak with him and he advised yes. Detective Keating had him sign a Miranda waiver and he spoke with me. Mr. Tiger advised he parked his car and went for a jog when a guy he knows as "D" meet up with him. Mr. Tiger then said he was then stopped by the police. Mr. Tiger denied being involved with the incident despite the evidence presented to him and Mr. Deron Bandy stating Mr. Tiger was involved.

[REDACTED]'s family hired an attorney and I was informed they were invoking their rights not to speak with me. [REDACTED]. was taken to Family Court Juvenile detention awaiting the Family court process.

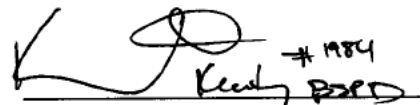
3. I believe the defendant:

- a. A danger to the community or to any other person because: of the fact all of the suspects have a criminal history with incidents similar to this one.**

Based on the information and evidence as outlined above Detective Keating feels probable cause exists to believe that the suspect **Deron E. Bandy**; Javonte M. Tiger; and [REDACTED] committed the crime of **Burglary 1st Degree** and that the offense occurred within the jurisdiction of the Circuit Court of Jackson County MO.

The facts contained herein are true.

Detective Kenneth Keating 1984
Blue Springs Missouri Police Department


Signature

THE COURT FINDS PROBABLE CAUSE.

Date

JUDGE

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)	PLAINTIFF,
vs.)	
JAVONTE M. TIGER)	
3904 S. Harbaugh Drive,)	CASE NO. 1716-CR
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DOB: 09/11/1998)	
Race/Sex: B/M;)	
SSN: XXX-XX-████)	
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State vs. Javonte M. Tiger

[REDACTED], and defendant appropriated such property without the consent of [REDACTED] and with the purpose to deprive [REDACTED] thereof.

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WITNESSES:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]