

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

POLICE NO. :	17-005262
PROSECUTOR NO. :	095440200

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
TYREIK BALDWIN	)	
1412 SW 23rd St.,	)	CASE NO. 1716-CR
Blue Springs, MO - 64015	)	DIVISION
DOB: 06/26/1996	)	
Race/Sex: B/M;	)	
SSN: XXX-XX-2338	)	
DEFENDANT.	)	

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 565.020, RSMo, in that on or about on or about June 30, 2017, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Harvey C Baldwin by striking him.

Count II. Domestic Assault 1st Degree - 1st Offense (565.072-002Y19991302.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.072, RSMo, committed the class B felony of domestic assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about June 30, 2017, in the County of Jackson, State of Missouri, the defendant struck [REDACTED] with a hammer, and such conduct was a substantial step toward the commission of the offense of domestic assault in the first degree of [REDACTED], and was done for the purpose of committing such assault and [REDACTED] and defendant were family or household members in that [REDACTED] and the defendant resided together and the defendant were related by blood.

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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 III. Armed Criminal Action (571.015-001Y19755299.0)

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 June 30, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Domestic Assault in the First Degree charged in Count II, all allegations of which are incorporated herein by reference, committed the felony of and the defendant committed the foregoing felony of Domestic Assault in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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 IV. Stealing - Motor Vehicle/watercraft/aircraft (570.030-038Y20172404.0)

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, committed the class D felony of stealing, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about June 30, 2017, in the County of Jackson, State of Missouri, the defendant appropriated a Black Dodge Truck, a motor vehicle, which property was owned by Harvey C Baldwin, and the defendant appropriated such property without the consent of Harvey C Baldwin and with the purpose to deprive him 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.

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.

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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/ Michael J. Hunt

Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
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Independence, MO - 64050
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WITNESSES:

Harvey C Baldwin , 1412 Sw 23rd Street, Blue Springs, MO - 64015

[REDACTED]

PO Nick Brooks , 1100 SW Smith, Blue Springs, MO - 64015

PO Robert Brown , 1100 SW Smith, Blue Springs, MO - 64015

PO Steven Emberton , 1100 SW Smith, Blue Springs, MO - 64015

DET Kenneth Keating , 1100 SW Smith, Blue Springs, MO - 64015

DET Martin Kreissler , 1100 SW Smith, Blue Springs, MO - 64015

PO Alex McIntyre , 1100 SW Smith, Blue Springs, MO - 64015

PO Paula Pickett , 1100 SW Smith, Blue Springs, MO - 64015

PO Krestin Rivers , 1100 SW Smith, Blue Springs, MO - 64015

PO Brandon Shrout , 1100 SW Smith, Blue Springs, MO - 64015

PO Michael Vieyera , 1100 SW Smith, Blue Springs, MO - 64015

PROBABLE CAUSE STATEMENT

Date: July 5, 2017

Police Complaint Number: 2017-05262

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 06-30-2017 between 1438 hours and 1645 hours at **1412 SW 23rd Street**, Blue Springs, Jackson County, Missouri 64015, **Tyreik A. Baldwin B/M 06-29-1996** committed one or more criminal offense(s).

2. **The facts supporting this belief are as follows:**

On 06-30-2017 at approximately 1406 hours, Harvey Baldwin (deceased) contacted Blue Springs Police and advised he was having an argument with his grandson, Tyreik. Officers made contact with Harvey up the street in Harvey's black Dodge Truck. Harvey advised officers Tyreik was out of control and they had argued over spilt sugar. Harvey had officers check his residence for Tyreik before he would go back into the residence. Officers did not locate Tyreik in the residence. Before the officers left Harvey stated "it is a matter of time before he (Tyreik) does something disastrous" and Tyreik is a "time bomb."

At approximately 2018 hours, Officers were dispatched back to the residence by Harvey's son, [REDACTED]. [REDACTED] also lives at the residence and is uncle to Tyreik Baldwin. [REDACTED] called emergency 911 and stated Tyreik had snuck up behind him, struck him in the head with a hammer, stole Harvey's 2012 Black Dodge truck (VIN:1C6RD7NTXC5108021; MO license 2HX-979; registered to Harvey Baldwin) and drove away.

Upon arrival, Officer Paula Pickett and Officer Nick Brooks contacted [REDACTED] who was sitting on the front porch bleeding from an apparent head injury. [REDACTED] advised officers and Detective Sergeant Russell he came home from work at approximate 1700 hours and saw Harvey's truck in the driveway. [REDACTED] stated he went inside and didn't see his dad but noticed the door to Harvey's room was closed/locked. [REDACTED] stated Tyreik would later tell him Harvey was sleeping and not to disturb him. [REDACTED] made it a point to state Tyreik and he did not ever talk so for Tyreik to say something to him stood out to [REDACTED]. [REDACTED] stated he fixed him some dinner, left and bought him a beer at local gas station then came back home. While at home, [REDACTED] advised Tyreik kept going upstairs and to the darkened garage and would stay in the garage for approximately 15-30 seconds then repeat the process. [REDACTED] room is right next to the garage so he could see Tyreik coming and going. [REDACTED] advised he never went to check what was going on but would tell Sgt. Russell after thinking back he believed Tyreik was

trying to lure him into the garage to kill him. [REDACTED] advised he tried calling Harvey on his cell phone but it went straight to voicemail, which [REDACTED] advised was unusual because Harvey would even answer the phone if he was sleeping and it never goes directly to voicemail. So at approximately 2000 hours, [REDACTED] believing something didn't "feel right" retrieves a butter knife and a sharp knife and walks up the stairs to Harvey's bedroom, where he encounters Tyreik [REDACTED] advised Tyreik told him Harvey doesn't want to be bothered but [REDACTED] disregarded and jimmied the door to Harvey's room and opened it to see that Harvey was not sleeping in his bed. [REDACTED] stated out of the corner of his eye he saw Tyreik coming up from behind him and struck [REDACTED] in the head with a hammer. [REDACTED] stated he immediately shut the door and held the door closed fearing if he opened the door Tyreik was going to kill him. [REDACTED] stated he called 911 and held the door until he heard Harvey's truck start up and he went outside.

[REDACTED] stated he just knew something was not right that he believe Tyreik did something to Harvey and Harvey was in the house somewhere. [REDACTED], Officer Brook and Officer Pickett searched the house where they did not immediately find Harvey. Officers came out side and start working on the assault case. It is approximately five minutes that [REDACTED] goes back into the house and searches more in depth. At approximately 2051 hours, [REDACTED] runs out of the residence to say he found Harvey. [REDACTED] stated he discovered Harvey in the basement, in a back room, in a chest freezer. [REDACTED] would later tell Sergeant Russell he looked all throughout the basement and something told him to search the freezer. Officers then immediately put out a stolen vehicle/attempt to locate on Harvey's truck in the computer system. According to the gas station receipt recovered later from Tyreik's person, debit/credit card were used at a gas stations in Lee's Summit and money is retrieved from the ATM. At least one of the cards used is Harvey's.

At approximately 2157 hours, Jackson County Sergeant Adam Zarrillo encounters Harvey's Dodge truck during an unrelated incident on north I470 highway. Sergeant Zarrillo's emergency equipment was activated and the truck would not yield the right away. Sergeant Zarrillo tried to get the truck to pull over to the right at which point the driver ignored the command and sped off. A computer check of the vehicle revealed it to be an active stolen vehicle out of Blue Springs also wanted in conjunction with a possible homicide. A pursuit ensued and after tire deflation devices were deployed Tyreik was taken into custody. The truck was recovered and transported to police evidence bay to be protected. A search warrant was obtained and two cell phones, believed to be Harvey's and Tyreik's was discovered. The phone believing to be Harvey's was dismantled. Tyreik was taken back to Blue Springs where during the booking process Detention officer noticed what appeared to be a brown substance believed to be possibly blood under his nails. A search warrant was obtained to gather the evidence. Also on Tyreik was Harvey's driver's license and receipt where Tyreik used Harvey's credit/debit card at an ATM after Harvey was already deceased.

Detectives obtained a search warrant and began investigating and collecting evidence at the residence. Located on the living room end table was a sharp kitchen knife with apparent blood on it believed to be the one [REDACTED] referenced. In the upstairs hallway

bathroom apparent blood, possible skin and hair fibers were located on the wall and closet. The trail of evidence was in an almost horizontal, linear fashion. There was bathroom cleaner spread on the bathroom floor just near the toilet. In the master bedroom located upstairs apparent blood was located just inside the door on the nightstand and on the floor. A butter knife was also located in the room. Also some type of bodily fluids was located along Harvey's bed. Discovered at the foot and under the overhang of the bed was a recently cleaned and still wet spot in the carpet that had a greenish tinge. The hallway leading down to the ground level and landing right before the garage and the sub-basement evidence was also discovered. Down in the sub-basement the floor had areas of standing water from an overflowed toilet with a wet-dry vacuum and a mop in a mop bucket nearby. Located in the sub-basement, behind a bar was an isolated storage room. In the storage room was a large chest freezer and inside the freezer was the body of Harvey Baldwin. Harvey was located head down and apparent blood/bodily fluid was pooled at the bottom of freezer with some of the bodily fluid seeping out of the freezer drain and onto the concrete floor.

Detective Kenneth Keating and Sgt. Russell read Tyreik his Miranda Warning and he agreed to talk with us. Tyreik began the interview asking why he was there. He advised he had been in the truck but he had been swabbed and stripped of his clothes and believed it was more serious than a stolen truck. Detectives later advised him his grandfather was dead. Tyreik showed no emotion when informed of Harvey's death. Detectives asked Tyreik about the argument earlier in the day where police were called. Tyreik denied being in an argument with Harvey and stated he had not been at the residence for two days. Detectives then asked about how he then got Harvey's truck he advised Harvey allowed him to drive the truck. When confronted about him saying he hadn't been there for two days but now he was there Tyreik stated he was there only to get the truck and that he did leave in the truck. Tyreik advised his Uncle [REDACTED] was out on the front porch and saw him get in the truck and that he took off because he knew [REDACTED] would call the police. I asked Tyreik why did it matter if [REDACTED] called the police if Harvey gave him permission to drive the truck and Tyreik advised he knew if he was stopped he had warrants out for his arrest and that is why he ran from Jackson County Sheriff's. Tyreik was also confronted about the fact Harvey called the police earlier in the day about spilt sugar. At first Tyreik denied having an argument about sugar then later he advised Harvey spoke to him over the phone about the spilt sugar and Tyreik blamed the cat for the spilt sugar. Tyreik denied striking [REDACTED] in the head with a hammer because he said he hadn't been at the residence in two days and alluded to [REDACTED] hitting himself in the hammer and trying to set him up. Detective confronted Tyreik about having Harvey's identification and he advised it's normal to have someone's driver's license. Tyreik was confronted about using Harvey's credit card and he stated he didn't use it that he only withdrew money from his own accounts. A comparison of the receipts on Tyreik and the credit cards used, one of the cards belonged to Harvey. Tyreik continued to deny having anything to do with either the assault on [REDACTED] or the death of Harvey.

The Jackson County Medical Examiner ruled Harvey's Baldwin's death a homicide finding evidence of blunt force trauma.

3. I believe the defendant:

- a. A danger to the community or to any other person because: of the violent nature of his crimes as well as past criminal behavior**

Based on the information and evidence as outlined above Detective Keating feels probable cause exists to believe that the suspect **Tyreik A. Baldwin** committed the crime of **Murder 1st Degree; Domestic Assault 1st Degree; Armed Criminal Action; Motor Vehicle Theft;** 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

/s/ Kenneth Keating #1984
Signature

THE COURT FINDS PROBABLE CAUSE.

Date

JUDGE