

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

POLICE NO. :	17-06374
PROSECUTOR NO. :	095441456

STATE OF MISSOURI,
PLAINTIFF,
vs.
OSIRIS N. SNEED
2414 E. 9th Street, #B
Kansas City, MO - 64124
DOB: 07/31/1997
Race/Sex: B/M;
SSN: XXX-XX-XXXX
DEFENDANT.

COMPLAINT

Count I. Assault - 3rd Degree - Special Victim (565.054-001Y20171312.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the class D felony of assault in the third degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about August 26, 2017, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, knowingly caused physical injury to [REDACTED] a corrections officer performing his official duties and special victim, by repeatedly kicking and punching [REDACTED]

The range of 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.

State vs. Osiris N. Sneed

JEAN PETERS BAKER

Prosecuting Attorney

Jackson County, Missouri

by,

/s/ Jeannette Wolpink

Jeannette Wolpink (#54970)

Assistant Prosecuting Attorney

415 E. 12th St., Floor 7M

Kansas City, MO - 64106

(816) 881-1776

jwolpink@jacksongov.org

WITNESSES:

[REDACTED]
[REDACTED]
[REDACTED]

STATEMENT OF PROBABLE CAUSE

JCSD CASE NUMBER 17-06374

DATE 09-26-2017

I, Detective Audrey Kelley, a deputy with the Jackson County, Missouri Sheriff's Department, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 08-26-2017, at 1300 Cherry KCMO 64106 which is inside the boundaries of Jackson County, Missouri, RODGERS, Rodney V., B/M, 05-03-1993, WILLARD, Tyrone E., B/M, 10-05-1996, CURTNER, Stephen A., W/M, 12-19-1996, and SNEED, OSIRIS N., B/M, 07-31-1997, committed one or more criminal offenses.

Assault

- 2) The facts supporting this belief are as follows:

On August 26th, 2017 an assault occurred at the jail around 2230 hours in the fifth floor housing unit "J5E," which is a lock down administrative segregation module, involving four inmates identified as RODGERS, WILLARD, CURTNER, and SNEED. The inmates planned and executed an attack on Corrections Office [REDACTED] by punching him with closed fists and kicking him. While SNEED, RODGERS, and WILLARD repeatedly struck C/O [REDACTED], Inmate, CURTNER did not directly engage in the attack on the C/O [REDACTED] but appeared to act as a lookout.

On August 29th, 2017, I spoke with C/O [REDACTED]. He advised me that earlier in the day on August 26th, 2017 he was handed a note from an inmate in J5E advising him that there would be more "Code 1's," which means more assaults, or inmates acting in such a way that Correction Officers need to call for emergency assistance. Later on August 26th, inmate RODGERS was out for his one hour release, and C/O [REDACTED] thought, he was the only inmate out in the module. Since it is a lock down floor, only one inmate is allowed out of their cell at a time. Around 2215 hours C/O [REDACTED] advised he was doing inner inmate checks of J5E. He checked the lower level then preceded to the check the upper tier when he observed an inmate run from behind a pillar in front of cell no. 13. This inmate ran in the opposite direction of C/O [REDACTED]. The inmate then ran down the stairs where inmate RODGERS was walking. Inmate SNEED was the inmate who ran from behind the pillar. Inmate SNEED stated to C/O [REDACTED] something to the effect of "we got you, we're gonna fuck you up." C/O [REDACTED] knew that the inmates were serious so he thought it would be best to come down from the top tier so the inmates would not throw him off of the elevated landing. When C/O [REDACTED] reached the bottom of the stairs, inmate SNEED immediately struck him with a closed fist in the chest. Inmate RODGERS, who was directly

behind inmate SNEED, immediately started to repeatedly hit C/O [REDACTED] with closed fists at the same time as inmate SNEED was also striking C/O [REDACTED] with closed fists. Inmate WILLARD ran from the bathroom/shower area and proceeds to also strike C/O [REDACTED] with closed fists. Inmate CURTNER ran out of the bathroom/shower area with WILLARD but he did not to strike C/O [REDACTED] but appeared to be a look out. C/O [REDACTED] advised that the inmates punched him multiple times with closed fists and kicked him in the back and side of his head and upper torso. He said he tried to keep his face covered to protect his face. The assault lasted approximately two minutes and C/O [REDACTED] advised, he "feared for his life." C/O [REDACTED] responded to North Kansas City Hospital to be checked out approximately three days after the assault due to constant headaches and a sore hand. His medical diagnosis was a neck sprain, head trauma/concussion, and an acute avulsion fracture at the dorsal margin of the base of the fifth distal phalanx, at the insertion of the extensor digitorum tendon. He is required to where a splint on the injured finger. C/O Anyanwu responded back to the hospital on August 30, 2017 for severe abdominal pain with nausea. His medical diagnosis for the emergency room visit on August 30, 2017 was "elevated cr," which indicates the kidneys are not functioning properly possibly caused by trauma for the affected area during the assault on August 26, 2017.

/s/ A. Kelley 40/0294

Detective Audrey Kelley 40/0294
Jackson County, Missouri Sheriff's Department

The court finds probable cause

Judge

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

POLICE NO. :	17-05740
PROSECUTOR NO. :	095441449

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
	)	
vs.	)	
TYRONE E. WILLARD II	)	
3530 College Ave.,	)	CASE NO. 1716-CR
Kansas City, MO - 64127	)	DIVISION
DOB: 10/05/1996	)	
Race/Sex: B/M;	)	
SSN: XXX-X [REDACTED]	)	
DEFENDANT.	)	

MISDEMEANOR INFORMATION
STATE REQUESTS A WARRANT

In the Circuit Court of Jackson County, Missouri, at Kansas City , Term, 2017. In Division Number ____ thereof, designated by the rules of said Court as Criminal Division ____.

Count I. Assault - 4th Degree - Pursuant To Subdivisions (1), (2), (4), (5) (565.056-001Y20171312.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.056, RSMo, committed the class A misdemeanor of assault in the fourth degree, punishable upon conviction under Sections 558.002 and 560.011, RSMo, in that on or about August 6, 2017, in the County of Jackson, State of Missouri, the defendant attempted to cause physical injury and physical pain to [REDACTED], a corrections officer performing his official duties and a special victim, by punching him with a closed fist in the face.

The range of punishment for a class A misdemeanor is imprisonment in the county jail or other authorized penal institution for a term not to exceed one (1) year; by a fine not to exceed two thousand dollars (\$2,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

State vs. Tyrone E. Willard II

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 a warrant be issued as provided by law.

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeannette Wolpink

Jeannette Wolpink (#5970)
Assistant Prosecuting Attorney
415 E. 12th St., 10th Fl
Kansas City, Missouri 64106
(816) 881-1776

WITNESSES:

DEP Chad Burns , 4001 NE Lakewood Way, Lees Summit, MO 64064-1703

[REDACTED]
[REDACTED]
[REDACTED]

STATEMENT OF PROBABLE CAUSE

JCSD CASE NUMBER 17-05740

DATE 09-26-2017

I, Detective Audrey Kelley, a deputy with the Jackson County, Missouri Sheriff's Department, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 08-06-2017, at 1300 Cherry KCMO 64106 which is inside the boundaries of Jackson County, Missouri, WILLARD, Tyrone E., B/M, 10-05-1996, committed one or more criminal offenses.

Assault

- 2) The facts supporting this belief are as follows:

On 08-06-2017 Corrections Officer [REDACTED] advised he was on the 5th floor (which is an administrative segregation floor) of the Jackson County Detention Center doing a "med pass." Inmate WILLARD, Tyrone was in J5E and it was his turn to come out of his cell and get his medication(s). C/O [REDACTED] advised that he could tell that inmate WILLARD was in a "bad mood" and was acting "aggressive" and cursing at him. C/O [REDACTED] said inmate, WILLARD punched him several times with a closed fist in the face/head area causing him to suffer a swollen left eye. C/O [REDACTED] was transported to North Kansas City Hospital for head and facial injuries. His medical diagnosis from the hospital was a facial contusion, head trauma/concussion, and blunt injury to the left eye.

/s/ A. Kelley 40/0294

Detective Audrey Kelley 40/0294
Jackson County, Missouri Sheriff's Department

The court finds probable cause

Judge