

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	19-002816
PROSECUTOR NO. :	095455463
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JARED M. DANIELS)	
205 NE Beacon Circle, Apt. B)	CASE NO. 1916-CR
Lees Summit, MO 64086)	DIVISION
DOB: 01/29/1991)	
Race/Sex: B/M)	
)	
)	
)	DEFENDANT.

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-
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 March 28, 2019, in the County of Jackson, State of Missouri, Taylor L. Stephens was killed by overdose as a result of the perpetration of the class C felony of Delivery of a Controlled Substance under Section 579.020, RSMo, committed by the defendant on or about March 28, 2019, 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. Delivery Of Controlled Substance Except 35 Grams Or Less Of Marijuana
Or Synthetic Cannabinoid (579.020-004Y20173513.0)**

State vs. Jared M. Daniels

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the **class C felony of delivery of a controlled substance**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 28, 2019, in the County of Jackson, State of Missouri, the defendant knowingly distributed heroin, a controlled substance, to Taylor L. Stephens, knowing that it was a controlled substance.

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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/ Alison Schenkelberg
Alison Schenkelberg (#69325)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-3582
AESchenkelberg@jacksongov.org

WITNESSES:

1. DET Chad Albin, 10 NE Tudor, Lee's Summit, MO 64086
2. [REDACTED]
3. PO Randall Cooper, 223 N. Memorial Drive, Independence, MO 64050
4. DET Aaron Ide, 10 NE Tudor, Lee's Summit, MO 64086
5. DET Mitch Kelley, 10 NE Tudor, Lee's Summit, MO 64086
6. DET Matt Miller, 10 NE Tudor, Lees Summit, MO 64086
7. [REDACTED]
8. [REDACTED]
9. PO Phillip Stewart, 10 NE Tudor, Lee's Summit, MO 64086

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 01-19-2576 (01-19-2816)

Date: 9-4-2019

I, Detective Phillip W. Stewart Jr , a police officer with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on March 28th, 2019 at 1708 NE White Drive Jackson County, Lee's Summit, MO, DANIELS, Jared M.; DOB: 1-29-1991; [REDACTED] of 205 NE Beacon Circle, Lee's Summit Missouri 64086 committed one or more criminal offenses.
2. The facts supporting this belief are as follows:

On 3-28-2019 at about 1908hrs Lee's Summit Police and Lee's Summit Fire personal responded to 1709 NE White Drive, Lee's Summit Missouri regarding a medical emergency involving Taylor STEPHENS, a 23 year old female. STEPHENS had been discovered by her live in boyfriend, [REDACTED] in the bathtub, underwater and purple. On police and fire arrival they began life saving procedures on STEPHENS who was unresponsive. Narcan and Epinephrine were administered and she was soon transported to the hospital where she was pronounced dead at 1958hrs.

At the scene officers located a syringe, a rubber tourniquet and a syringe cap in the bathroom. STEPHENS was a known Heroin user and the syringe is suspected to have been used to inject Heroin.

On 4-3-2019 DET Matt MILLER spoke to an anonymous person who wanted to supply information of a person selling Heroin in the Lee's Summit area. This person stated they are an associate of a Heroin user who had asked them to give information to the police about Jared DANIELS who is selling Heroin. The anonymous person stated STEPHENS was one of several other people who obtains Heroin from DANIELS. Information had previously been received in August 2014, and December 2018 that DANIELS was selling Heroin. A further investigation into these claims was initiated to determine if DANIELS had supplied Heroin to STEPHENS on 3-28-2019.

On 4-9-2019 DET Mitch KELLEY and I spoke to [REDACTED] who was a known associate of DANIELS and had once lived in the same house together. During the interview [REDACTED] said he knew STEPHENS and had heard STEPHENS died from a Heroin overdose from Heroin supplied by DANIELS. [REDACTED] further told us that he knew DANIELS sold Heroin and has purchased Heroin from DANIELS in the past.

Also on 4-9-2019 DET KELLEY and I spoke to [REDACTED]. During the interview he said he had remained clean of Heroin and had been doing his best to help STEPHENS stay clean as well. A short time prior to STEPHENS' death he discovered she had been obtaining Heroin from DANIELS. [REDACTED] said he had read text messages between DANIELS and STEPHENS in which DANIELS said he would "just give" her Heroin.

On 4-9-2019 DET KELLEY and I conducted physical surveillance of DANIELS. During this time DANIELS was observed driving and was known to have a suspended/revoked driver's license in the State of Missouri. He was stopped by uniform officers and arrested for the offense. DANIELS was also found to be in possession of Heroin, pills (of a controlled substance) and other drug paraphernalia.

Later on 4-9-2019 DET M MILLER and I conducted a recorded interview with DANIELS. He was advised of his rights to which he stated he understood. During the interview DANIELS admitted he does supply Heroin to others as a means to keep himself supplied with Heroin. In regard to STEPHENS, DANIELS stated he knew her and had supplied her with Heroin on 3-28-2019. He added that he Heroin he supplied came from a person he knows as "Jay" who he in turn delivered to STEPHENS.

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 01-19-2576 (01-19-2816)

DANIELS further stated he had transported STEPHENS to Wal-Mart on 3-28-2019. DANIELS said that her condition did not cause him any alarm. Specifically, he said, "She didn't look like she was about to croak or nothing." He began to recant his earlier confession that he had supplied Heroin to STEPHENS shortly before she died. DANIELS denied that he had even made that statement. DANIELS said, "Well, I know for a fact that what I got and what I handed over isn't what put her down." In context, DANIELS was confessing that he had supplied heroin to STEPHENS, although he was denying that the heroin he supplied her was the fatal dose.

DANIELS was also asked for consent to examine the contents and messages on his phone. DANIELS stated that he was a "middle man" (referring to obtaining drugs for other people) and he did not want me to see the messages that he knew were on his mobile device that he was certain would prove that he arranged drug transactions. DANIELS said that he typically sold no more than a "couple of grams" to people.

On 4-25-2019 the final report from the Medical Examiner's Officer was received. It showed STEPHENS cause of death to be "Drowning, with Other Significant Condition to be Acute Heroin and Fentanyl Intoxication". The toxicology report showed the following levels/concentration:

- Fentanyl; 2.9 ng/ml with a therapeutic range of 1-3
- Morphine (opioid/heroin): 464 ng/ml with a therapeutic range of 10-80
- 6- Monoacetylmorphine: 39.8 ng/ml with no established therapeutic range

The therapeutic level of a drug is the range within which that drug is expected to be effective without causing any serious problems. 6- Monoacetylmorphine is an active metabolite of Heroin with another being Morphine. The level of Morphine in STEPHENS is far above that of a therapeutic range.

A digital forensic examination was requested for STEPHENS' phone which was received 8-1-2019. During a review of the information a text conversation was found between DANIELS and STEPHENS on 3-28-2019, the day of STEPHENS' death. At about 1100hrs STEPHENS contacts DANIELS and "how much would you do just a p for?" I know this to mean STEPHENS is asking DANIELS for a "point" of Heroin. A "point" being .1 grams. STEPHENS told DANIELS she had \$20.00. It was later learned that [REDACTED] gave her \$20.00 that morning. As the conversation continued DANIELS offers "subs" also. "subs" meaning suboxone which is a controlled substance used for the addiction of Heroin. DANIELS also appeared to offer STEPHENS designer "shit". This could be in reference to a number of drugs to include Heroin with Fentanyl. A short time before 1200hrs the messages indicate DANIELS and STEPHENS meet. They soon go to Wal-Mart and part ways.

Efforts were made to determine if STEPHENS meet or contacted anyone else after parting from DANIELS. The following actions were taken:

When further examining her phone no further messages were observed to indicate she contacted anyone else for Heroin. There were phone calls and text between who had been determined to be her father and [REDACTED]

Also video from Wal-Mart was obtained. It showed STEPHENS arriving there with DANIELS at about 1253hrs where she enters the store. She remains in the store until about 1515hrs where she leaves, entering a black truck. This was later determined to be her father, Robert Stephens. While at Wal-Mart no footage was observed showing STEPHENS meeting with anyone else.

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 01-19-2576 (01-19-2816)

On 8-28-2019 DET KELLEY and I conducted an interview with STEPHENS' father. He said he met with STEPHENS at Wal-Mart at about 1330hrs after she had called him. There he gave her money to purchase groceries and other items after she told him she had lost \$20.00. Robert waited outside until STEPHENS was finished shopping then took her home to 1709 NE White Drive, Lee's Summit Missouri at about 1515hrs. Robert stayed with her for about another 15 minutes before leaving a little after 1600hrs. Robert said he was aware of STEPHENS' drug issues and has been present around her when she was under the influence of drugs. When asked, Robert was certain T STEPHENS was not under the influence of any drugs while she was in his presence on 3-28-2019.

On 9-3-2019 at about 1206hrs SGT Greg BRYANT and I met with [REDACTED] to talk to him about his interactions with STEPHENS on 3-28-2019. During the interview with [REDACTED] he stated he was being supportive and helping STEPHENS with her recovery of Heroin use. On 3-28-2019 [REDACTED] left for work at about 0730hrs. Prior to leaving [REDACTED] gave STEPHENS \$20.00 for the purpose of purchasing groceries and other items. [REDACTED] works for a landscaping/lawn care business. Due to the rains on 3-28-2019 he was released early from work, arriving home at about 1400hrs. When arriving home STEPHENS was not there but he soon contacted her by phone. During that phone conversation STEPHENS told him she was at Wal-Mart still shopping. She further told him her father (Robert STEPHENS) was going to bring her home. When asked, [REDACTED] said STEPHENS was not under the influence of any drug when on the phone with her. He said he knew STEPHENS well enough to know when she was under the influence and has spoken to her in the past over the phone when under the influence.

[REDACTED] said STEPHENS arrived home sometime between 1430hrs and 1500hrs in the company of her father. [REDACTED] watched a movie with STEPHENS until about 1700hrs when STEPHENS stated she wanted to take a bath. During the time of watching the movie to the time STEPHENS got into the bathtub, [REDACTED] is certain she was not under the influence of any drug.

About an hour and half later [REDACTED] went to check on STEPHENS. He said it was not unusual for her to spend a long time in the bath. He checked after he noticed the music was no longer playing. He knocked on the door, did not receive an answer then went in. When entering [REDACTED] saw STEPHENS was under the water. He pulled her out and saw that she was purple and began compressions. [REDACTED] continued the compression for a short time then called 911. He was advised medical help was on the way and told to continue the compressions. While doing the compressions [REDACTED] stated he observed a syringe in the bathroom.

[REDACTED] suspected STEPHENS death was related to Heroin use and further suspected she received the Heroin from Jared DANIELS. He suspected this because both he and STEPHENS were friends with DANIELS and had routinely been supplied Heroin from DANIELS. Because of this suspicion [REDACTED] contacted DANIELS by phone using the Facebook messenger application on 3-28-2019 a short time after STEPHENS' death. [REDACTED] did not immediately tell DANIELS of STEPHENS death. He did however ask DANIELS if he had meet with STEPHENS that day. DANIELS told [REDACTED] he had and meet her at Wal-Mart. [REDACTED] next asked DANIELS if he had given STEPHENS and "shit" (meaning Heroin) to which DANIELS stated he had.

During the course of this investigation information was obtained regarding Zachary MUNOZ. MUNOZ was found deceased in his home on 3-25-2019 as a result of a Heroin overdose. This was three days prior to STEPHENS' death. When this investigation started MUNOZ was known to be associated with BURGHOFF and STEPHENS

On 10-9-2019 I spoke to [REDACTED] by phone. The purpose of the call was to determine if there was any

STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 01-19-2576 (01-19-2816)

relationship between him, MUNOZ and Jared DANIELS. [REDACTED] said he was an acquaintance of MUNOZ for several years and had at one time dated MUNOZ's sister.

[REDACTED] also told me he knew MUNOZ to use Heroin and DANIELS was a Heroin source for MUNOZ. [REDACTED] went on to tell me that he knew DANIELS had met with MUNOZ the night before MUNOZ's death, 3-25-2019. [REDACTED] said on the night of 3-24-2019 DANIELS was at his residence (1709 NE White Drive apt A, Lee's Summit Missouri) with he and Taylor STEPHENS. While together DANIELS asked to use [REDACTED]'s phone, claiming that his phone needed to be charged. [REDACTED] agreed and allowed DANIELS to use the phone. At the time of the phone use [REDACTED] did not know who DANIELS was contacting. Sometime later, [REDACTED] said DANIELS went outside to the front of the residence and met with someone he ([REDACTED]) could not see. DANIELS met with this person for a short time and returned back to the house. [REDACTED]'s phone was later returned. Sometime after that [REDACTED] viewed the messages on his phone. He saw a message from MUNOZ reading "I'm here". [REDACTED] said the time of the message was about the same time DANIELS was meeting with the unknown person in front of the residence. This was the only message from MUNOZ still on [REDACTED]'s phone because [REDACTED] suspects DANIELS of deleting all the previous messages/text between DANIELS and MUNOZ.

As explained above; the locations, movements and meetings STEPHENS had with anyone on 3-28-2019 have been determined by examining the contents of her phone, video footage and interviews with DANIELS, Robert STEPHENS and [REDACTED]. She didn't meet with or contact anyone else other than DANIELS to obtain Heroin. Further, there is no indication she used the Heroin until she was left alone in the bathroom at her residence.

Since the cause of STEPHENS' death listed a significant condition of acute heroin and fentanyl intoxication and DANIELS (and only DANIELS) delivered Heroin to STEPHENS on the date of her death; DANIELS actions directly contributed to STEPHENS' death.

A check of DANIELS criminal history showed the following:

2008: Arrest; possession Marijuana
2009: Arrest; fail to obey
2009: Arrest; driving while intoxicated
2010: A total of 6 driving while revoked/suspended arrests and/or convictions
2014: Arrest; possession controlled substance
2016: 2 convictions for stealing
2018: Conviction; possession controlled substance
2019: Arrest; possession controlled substance; possession drug paraphernalia and weapons violation.

No further

STEWART, Phillip W. Jr. #1001
Print Name (Police Officer)

/s/ STEWART, Phillip W. Jr.
Signature (Police Officer)