

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

POLICE NO. :	20-1896
PROSECUTOR NO. :	095459785
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
TYRONE JOHNSON)	
1815 Brookstone Village Ct., #308)	CASE NO. 2016-CR
Independence, MO 64057)	DIVISION
DOB: 10/12/1972)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Kidnapping - 1st Degree (565.110-001Y19001006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the **class A felony of kidnapping in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about July 3, 2020, in the County of Jackson, State of Missouri, defendant unlawfully removed Confidential Victim from East 350 Highway, the place where Confidential Victim was found by defendant, without Confidential Victim's consent by physically overpowering Confidential Victim and forcing her into a car against Confidential Victim's will.

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.

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Count II. Domestic Assault 1st Degree - Serious Physical Injury (565.072-001Y19991304.0)

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 A felony of domestic assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about July 3, 2020, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to Confidential Victim by shooting the Confidential Victim and Confidential Victim and defendant were family or household members in that Confidential Victim and the defendant were persons who had been in a continuing social relationship of a romantic or intimate nature.

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 III. 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 July 3, 2020, in the County of Jackson, State of Missouri, the defendant committed the felony of domestic assault charged in Count 2, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of domestic assault 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to

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any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

**Count IV. Discharge/shoot Firearm At Or From Motor Vehicle/shoot At Person,
Another Motor Vehicle, Or Building/habitable Structure- Persistent Offender
(571.030-001Y20035213.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the **class B Felony of unlawful use of a weapon**, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 3, 2020, at 59th & Raytown Rd, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at an Acura TLX.

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. Pursuant to Section 571.030.9, RSMo, for the first violation a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony; for any violation by a prior offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release for a term of ten (10) years; and for any violation by a persistent offender as defined in Section 558.016, RSMo, a person shall be sentenced to the maximum authorized term of imprisonment for a class B felony without the possibility of parole, probation, or conditional release.

Count V. Domestic Assault - 2nd Degree (565.073-003Y20171399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.073, RSMo, committed the **class D felony of domestic assault in the second degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 3, 2020, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to Confidential Victim by choking the Confidential Victim and Confidential Victim and defendant were family or household members in that Confidential Victim and the defendant were persons who had been in a continuing social relationship of a romantic or intimate nature.

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.

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Count VI. Unlawful Possession Of A Firearm (571.070-001Y20175212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.002 and 558.011, RSMo, in that on or about July 3, 2020, in the County of Jackson, State of Missouri, the defendant knowingly possessed a black Glock, a firearm, and on April 2, 2015, the defendant was convicted of the felony of 2nd Degree Assault in the Jackson County Circuit Court of Missouri.

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.

Count VII. Tampering With Physical Evidence In Felony Prosecution (575.100-001Y20175006.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.100, RSMo, committed the **class E felony of tampering with physical evidence**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about July 3, 2020, in the County of Jackson, State of Missouri, the defendant concealed spent shell casings with the purpose to impair its availability for an official investigation, and thereby obstructed the prosecution of himself for the crime of Domestic Assault or Unlawful Use of a Weapon, each a felony.

The range of punishment for a class E 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 four (4) 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.

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The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Joel E Ritchie

Joel E Ritchie (#71249)
Assistant Prosecuting Attorney
415 E. 12th Street
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(816) 881-4308

WITNESSES:

1. CPL Thomas Greer, 10000 E. 59th Street, Raytown, MO 64133
2. PO Douglas Hall, 10000 E. 59th Street, Raytown, MO 64133
3. PO Erica Hopper, 10000 E. 59th St., Raytown, MO 64133
4. Confidential Informant, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106

Probable Cause Statement Form

Date: 7/3/2020

Report: 20-1896

I, Erica Hopper, 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 7/3/2020 at E. 59th Street and Raytown Trafficway, Raytown, Missouri 64133, Tyrone Johnson, a black male born 10/12/1972, [REDACTED], committed one or more criminal offense(s).

The facts supporting this belief are as follows:

On 7/3/2020 at 0609 hours, Raytown Police Officer Thomas Greer, whom was returning from a uniformed off-duty assignment, reported to Raytown Dispatch the sound of several shots fired in the area of E. 59th Street and Raytown Trafficway. Raytown, Jackson County, Missouri 64133. Officer Greer then observed Raytown Police Reserve Corporal Douglass Hall driving quickly into the parking lot of the Raytown Police Department located at 10000 E. 59th Street, Raytown, Missouri 64133. Officer Greer immediately recognized the vehicle to be Reserve Corporal Hall's personally-owned vehicle which had several bullet holes along the passenger side. Located inside Reserve Corporal Hall's personal vehicle was a shooting victim, identified as [REDACTED] who was shot in the leg.

Reserve Corporal Hall advised he was traveling northbound on Raytown Trafficway approaching E. 59th Street in his personally-owned vehicle (blue 2019 Acura TLX bearing Missouri License plate of XB8-M4H and VIN: 19UUB3F61KA004405) when he observed a black 2006 Chevy Impala (bearing Missouri license plate EA5-T8W and VIN: 2G1WU581769151823) registered to Tyrone Johnson stopped in the number one lane of Raytown Trafficway just north of the intersection with the front passenger and front driver's side doors open. As Reserve Corporal Hall approached the vehicle to check on the occupants believing they were having vehicle troubles, [REDACTED]. approached the Acura and made a statement to "get me out of here". Reserve Officer Hall observed [REDACTED] to be in distress and advised her to get into the Acura. Due to his positioning where he stopped his Acura in relation to the Chevy Impala, he had to back up to make the turn to drive away toward the Raytown Police Department where he was going to give her a courtesy ride to. As he was repositioning the Acura, a black male, ultimately identified as Tyrone Johnson, stepped out of the Chevy Impala and began firing several gunshots at the Acura, causing bullet damage to the Acura. [REDACTED]. was subsequently shot in the leg and transported to Truman Hospital for medical treatment.

An interview was conducted with [REDACTED]. at Truman Hospital where she reported she was in an argument with boyfriend, Tyrone Johnson, earlier in the morning which started in Room #149 of Crown Lodge (8500 E. 350 Highway, Kansas City, Jackson County, Missouri 64133). During the disturbance at Crown Lodge, she reported Tyrone Johnson choked her and when she regained consciousness, she was on the ground and he was dragging her toward the door of the motel room. [REDACTED] then left on foot and while walking on E. 350 Highway, Tyrone Johnson pulled up next to her and forced her in the Impala against her will by physically overpowering her. She reported he then drove her to an unknown park before arriving to the intersection of E. 59th Street and Raytown Trafficway. While arriving in the area of the intersection, [REDACTED] advised when she tried to jump out of the Impala, he slammed on the brakes, stopping the Impala on the roadway. As the vehicle came to a rest, [REDACTED] advised she was able to get out and when she turned around to run, she observed a vehicle (Acura) and got in it. [REDACTED]. stated she and Tyrone Johnson were the sole occupants in the vehicle and the only other vehicle in the area was the Acura at the time of the incident. She also reported Tyrone Johnson said "Bitch, I'm gonna fucking

shoot you” as she was getting into Reserve Corporal’s Acura. [REDACTED] said she was aware Tyrone Johnson had a firearm and described it as a black Glock 9mm handgun.

Raytown Patrol Corporal Speakman responded to Crown Lodge and observed a black male as described kneeling down next to a black Chevy Impala, cleaning it out. Corporal Speakman ran the license plate to the Impala, which responded back to Tyrone Johnson. Tyrone Johnson was observed throwing a handful of items into a trash can in a nearby breezeway, which was later discovered to be spent shell casings. Upon contact with Tyrone Johnson, he made the spontaneous utterance that he didn’t do anything wrong. He also stated he got into an argument with his girlfriend, whom he referred to by her first name ([REDACTED] who had already left the area. Due to the totality of the circumstances, Tyrone Johnson was taken into custody and transported to Raytown Police Department for Booking Procedures.

Tyrone Johnson invoked his rights to council prior to an interview being conducted.

Tyrone Johnson is a State of Missouri Convicted Felon, is currently on Probation through Missouri Probation/Parole District 4 Central and has the following criminal history:

- Trespass/1st (2013), 1316CR0257701, 6 months DOC
- Violation of Order Protection (2013), 1316CR0257701, 1 DOC
- Assault/2nd (2013), 1316CR0257701, 10 DOC
- Assault/3rd Subd. 1,2,4 &6 (2013), 1316CR0257701, 1 DOC