

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

POLICE NO. :	KC20076066
PROSECUTOR NO. :	095461755
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
TREVER A. YOUNG)	
3720 Gardner Ave., Room 35)	CASE NO. 2016-CR
Kansas City, MO 64120)	DIVISION
DOB: 07/02/1992)	
Race/Sex: W/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200904.0)

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 November 5, 2020, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Daniel R Atkison, caused the death of Daniel R Atkison by stabbing him.

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. Armed Criminal Action (571.015-001Y20205212.0)

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 on or about November 5, 2020, in the County of

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Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon and dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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 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. The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to 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.

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.

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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/ Jamie K. Hunt
Jamie K. Hunt (#50401)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-4622
jhunt@jacksongov.org

WITNESSES:

1. DET Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106
2. Daniel R Atkison, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3. DET Jarrel D. Berryman,
4. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
64106
7. DET Rodney E. Haney, 1125 Locust, Kansas City, MO 64106
8. CST Pamela Owens, 1125 Locust, Kansas City, MO 64106
9. [REDACTED]
64106
10. SGT Samuel J Spencer, 1125 Locust, Kansas City, MO 64106
11. PO Adison D. Waterman, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 11-05-2020

CRN: KC20-076066

I, Detective Rodney E. Haney #5065 Kansas City, Missouri Police Department
(Name and identify law enforcement officer, or person having information as probable cause.)

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 11-05-2020, at 3708 Gardner Ave in
(Date) (Address)

Kansas City, Jackson Missouri Trever A. Young
(County) (Name of Offender(s))

W/M, 07-02-1992 6'01, 170 lbs committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 11/05/2020, at approximately 1311 hours, officers of the Kansas City, Missouri Police Department were dispatched to 3708 Gardner Avenue Kansas City, Jackson County, MO 64120 on a reported cutting call for service. Upon arrival officers located a victim, later identified as Daniel Atkison, W/M, 07-14-1985, suffering from apparent trauma to his body. KCFD EMS responded and transported the victim to an area hospital where he died as a result of the injuries he sustained. Witness #1, while at the scene, provided a description of the suspect as a white male, black clothes, with an orange and black duffle bag, and specifically identified him as **Trever A. Young W/M, 07-02-1992**. The Witness also provided officers with Young's direction of travel on foot from the scene.

While conducting an area canvass for the suspect officers entered the Conoco located at 840 N. Montgall Avenue, Kansas City, Jackson County, Missouri and made contact with the clerk. Officers provided the clerk with the description of **Young** and asked if anyone matching the aforementioned description entered the business. The clerk informed officers a male matching the provided description did enter the store and purchased a Red Bull energy drink. The clerk subsequently allowed officers to view the business' surveillance system and officers observed **Young** enter the store on 11/5/2020 at 1323 hours and exited the store at 1325 hours. He then walked south on Montgall Avenue and turned west out of the view of the business' surveillance system. The same individual, consistent with the description provided by Witness #1, was then observed in the area of 1st Street and I-35, under the bridge. This individual, believed to be Young, was observed by officers attempting to burn a MO Identification Card with the name of **Trever A. Young, W/M, 07-02-1992**. Young was taken into custody without incident by officers. Officers observed **Young** to have apparent blood on his clothing and **Young** had an apparently bloody knife in his right front sweatshirt pocket. **Young** was observed to have a visible injury to his face; however he refused medical attention when it was offered. Young made no statements when he was taken into custody and transported to police headquarters, 1125 Locust St.

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Witness #1 is the manager of the residential multi-unit structure (the dispatched address), which is a former hotel that is now a halfway house for former sex offenders and drug offenders. Witness #1 was contacted by detectives and provided a formal statement. Witness #1 knew **Young** as a current resident. He stated that he also knew the victim because he was a former resident, whose residency was terminated on Monday. The victim was there on 11/5/2020 to pick up his mail, and Witness #2 accompanied the victim to pick up his mail.

Witness #1 related that on 11/5/2020, the victim had arrived with Witness #2 and entered the lobby of the building. Witness #1 and the victim spoke in the lobby of the address about property the victim had left at the location. **Young** was in the lobby as well, and tried to make verbal contact with the victim who did not respond. The victim then left the lobby with Witness #2 shortly thereafter. **Young** then quickly exited the lobby and he followed the victim, who was in the company of Witness #2. Witness #1 stated he observed **Young** walk up behind the victim and stab the victim multiple times in the torso. Witness #1 stated he assisted the injured victim back into the lobby and told **Young** to leave. Witness #1 stated he then used a stun gun to “tase” **Young** after **Young** became increasingly agitated. After being tased, **Young** fled the scene on foot westbound on Gardner Avenue. Witness #1 was presented with a color photo line-up consisting of six males similar in appearance, and he positively identified **Trever A. Young, W/M, 07-02-1992**, as the subject he observed stab the victim.

Witness #2 stated he and the victim stopped by the residence to speak with a friend of the victim. After Witness #2 and the victim walked out of the residence, **Young** followed them closely. Witness #2 said he observed **Young** punch the victim 2 or 3 times in the stomach. Witness #3 ran over and tackled **Young**, and Witness #2 attempted to drag the victim away from **Young** when he realized the victim had been stabbed in the stomach. Witness #2 stated Witness #1 tased **Young** with a handheld taser after the assault; however **Young** got up and ran from the scene. Witness #2 was unable to positively identify **Young** but provided an accurate description of **Young** and his clothing which was consistent with the description provided by Witness #1.

A third Witness was contacted who provided a statement and description consistent with Witness #1, but was unable to positively identify **Young** from a six person photo line-up.

At approximately 1901 hours, Miranda Waiver Rights were read out loud to **Young** and he stated he understood his rights. Prior to any interview being conducted, **Young** was transported to an area hospital for medical treatment for the injury to his lip, and due to his comment that he felt dizzy. The injury is believed to have been caused after he apparently fell down after Witness #1 used the taser on **Young** after the assault. **Young** was treated and released and transported to the Detention Facility located at the Metro Patrol Division Station.

On 11-06-2020 at approximately 0807 hours, detectives responded to the Metro Patrol Division Station to attempt to interview **Young**, but he refused to exit his jail cell and told Detectives, “*I don’t got shit to say to ya’ll.*” Detectives ceased further communication.

Young’s criminal history revealed him to be a convicted felon for 1st Degree Statutory Rape and to currently be on parole through the State of Missouri. He also has a pending Aggravated Domestic Violence

PROBABLE CAUSE STATEMENT FORM

CRN KC20-076066

Assault investigation (cutting) in Kansas City, MO (CRN #KC20-75937). Due to the previous conviction and the current pending investigation regarding assault (with the use of a knife), which occurred on 11/4/2020, detectives request this warrant to hold **Young** for his specific and direct actions in regard to the violent described incident above.

Printed Name /S/ Det. Rodney E. Haney #5065 Signature Det. Rodney Haney #5065

The Court finds probable cause and directs the issuance of a warrant this _____ day of _____.

Judge

Circuit Court of _____ County, State of Missouri.