


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

<b>POLICE NO. :</b>	21-013693
<b>PROSECUTOR NO. :</b>	095463295
<b>OCN:</b>	QO005152

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>TYLER J. RUSSELL</b>	)	
<b>LKA: 404 SE 7th St., Homeless</b>	)	<b>CASE NO. 2116-CR</b>
<b>Lees Summit, MO 64063</b>	)	<b>DIVISION</b>
<b>DOB: 12/03/1991</b>	)	
<b>Race/Sex: W/M</b>	)	
	)	
	<b>DEFENDANT.</b>	)

**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-  
003Y20200999.0)**

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 8, 2021, in the County of Jackson, State of Missouri, Thomas Galvan was killed by being shot as a result of the perpetration of the class A felony of Robbery in the First Degree under Section 570.023, RSMo committed by the defendant on or about March 8, 2021, 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.

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**Count II. Armed Criminal Action (571.015-001Y20205299.0)**

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 March 8, 2021, in the County of 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.

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.

**Count III. Robbery - 1st Degree (570.023-001Y20201204.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 8, 2021, in the County of Jackson, State of Missouri, the defendant either acting alone or in concert with another, forcibly stole a phone in the possession of [REDACTED], and in the course thereof the defendant was armed with a deadly weapon.

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 IV. Armed Criminal Action (571.015-001Y20205299.0)**

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 March 8, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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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. assistance, or aid of a dangerous instrument or deadly weapon.

### **Count V. Robbery - 1st Degree (570.023-001Y20201204.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **class A felony of robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about March 8, 2021, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with another, forcibly stole Shoes in the possession of Thomas Galvan, and in the course thereof the defendant was armed with a deadly weapon.

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 VI. Armed Criminal Action (571.015-001Y20205299.0)**

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 March 8, 2021, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

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.

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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/ Michael J. Hunt*  
Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
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**WITNESSES:**

1. DET Christopher Burris, 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 3/9/2021

Report #: 2021-13693

I, Christopher Burris, a Detective with the Independence, Missouri, Police Department, 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 3/8/2021, at approximately 0420 hours, Tyler J. Russell, (Race- White, Sex- Male, DOB- 12/03/1991, Address-Homeless, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 03/08/2021 at 0427 hours, Independence Police Officers were dispatched to room # 124 of the Executive Inn and Suites, 15014 East U.S. 40 Highway, Independence, Jackson County, Missouri reference to a shooting. Upon arrival, officers responded to room # 124. The door to # 124 was partially cracked. When Officer Brian Hanrahan started to push on the door, he observed a large amount of apparent blood inside the doorway and what appeared to be a body lying behind the door. [REDACTED] was standing next to the bed inside the room. Officers entered the room, conducted a safety sweep and removed [REDACTED]. The victim, later identified as Tomas Galvan, was transported to an area hospital where he was subsequently pronounced deceased.

Officers and investigators spoke with [REDACTED] who reported Galvan had arrived at her room around 2200 hours on 03/07/2021 to hang out for her birthday. [REDACTED] said at some point Galvan called two males; both possibly named Tyler, to give him a ride back home. [REDACTED] described them both as skinny white males. [REDACTED] advised one had shoulder length reddish brown hair and the other had short brown hair. [REDACTED] said both males arrived around about 0300 hours. [REDACTED] reported Galvan argued with the males about them stealing an air compressor from him and [REDACTED] said she left with one of the male subjects, the male with the shoulder length reddish brown hair and went to Quik Trip at Lee's Summit Road and U.S. 40 Highway. [REDACTED] said they bought drinks and cigarettes and returned to room # 124. [REDACTED] reported that one of the males realized he recognized Galvan as a person that robbed a female friend of his in the past. [REDACTED] stated both males drew handguns and pointed at her and Galvan. [REDACTED] said they told Galvan to "drop his pockets" and take off his shoes. [REDACTED] stated the male with short brown hair then shot Galvan in the head as he tried to grab for the gun. [REDACTED] advised both parties grabbed Galvan's property, as well as her cell phone and driver's license and ran out of the room. [REDACTED] stated the male with the brown hair came back into the room and wiped his hands off on her cardigan sweater and he left with the item. Both subjects left the area in a silver car with damage to the front end. [REDACTED] asked the female in front of room # 121 to call 911 and went back into room # 124 to wait for police. [REDACTED] also stated Galvan summoned the males over to complete a drug transaction.

Detective Burris observed surveillance video that was recovered by crime scene investigators from Executive Inn that revealed the suspects were driving and riding in a 2009 Subaru Impreza bearing Missouri license ED9U4V. Detective Burris had Intelligence Unit personnel publish a bulletin for law enforcement with the surveillance images. KCPD Detective Darin Lee responded to the bulletin and said the car had been towed and impounded by KCPD on 12/10/2020. The car belonged to Steven Tyler Decker who lived at 328 South Kentucky Avenue, Independence, Missouri. Decker's physical appearance provided to Detective Burris was consistent as he was a skinny male and had shoulder length reddish brown hair.

[REDACTED] was shown a photographic line-up with Decker in it. After reviewing the line-up [REDACTED] stated she believed one of the males was Decker, however she was not sure enough to make a positive identification.

At about 1412 hours, Detective Burris received information that Decker picked his six year old son up from school. According to school staff, Decker was either crying or had been crying and staff overheard him say that he was going to prison for 25 years.

On 03/8/2021 around 1430 hours, Detective Pagel and Detective Breshears drove around the area of 328 South Kentucky Avenue to see if they could locate the suspect vehicle at the residence. While driving past 328 South Kentucky Avenue, both detectives observed Decker exit the house from the front door and walk into the front yard. Detective Pagel and Detective Breshears left the area and called other units to advise of Decker's whereabouts. Detective Burris responded to the area and called Decker's cellular phone. Detective Burris told Decker that he needed to speak to him about this case. Decker sounded upset and said he did not mean for this to happen and he was only giving someone a ride. Decker began to cry and wanted his attorney. Detective Burris assured Decker if he exited he would facilitate contact with his attorney. Due to the nature and for officer safety, Detective Burris asked if Decker was armed and he advised he was. Detective Burris told him to put the gun away and come out with his hands up. Decker told Detective Burris that he was putting the gun on the refrigerator in the kitchen. Decker subsequently exited the house alone and was arrested without incident.

During the arrest of Decker, investigators took custody of his six year old son while Decker's father responded to get him. Decker's son told Detective Emily Knox that the suspect in the shooting only had one arm. This information was provided to Detective Knox without her asking the juvenile any questions about this case. Upon the arrival of Decker's father, he indicated he knew the shooter was a person who only had one arm. When Detective Pagel asked Decker's father he knew the name of the suspect, Decker's son told Detective Pagel that it was Tyler Russell.

An interview was attempted at Police Headquarters with Decker's attorney present. After being read his Miranda rights, Decker advised that on the advice of counsel wanted to invoke his 5th amendment right.

In subsequent review of the surveillance video, the passenger who arrives at the room with Decker before the shooting does appear to have only one arm. The subject's left arm appears to be missing at the shoulder. [REDACTED] was shown a photographic line-up with Russell in it. After reviewing the line-up [REDACTED] stated she believed one of the males was Russell, however she was not sure enough to make a positive identification. Russell had brown hair which was shorter than Decker's.

A stop order was entered for Russell's arrest. On 03/09/2021, after investigative follow-up by the Independence Police Street Crimes Unit, Russell was located at Home Towne Studios hotel at 4301 North Corrington Avenue, Kansas City, Missouri 64117 Room # 325. He was arrested after exiting room #325 in the parking lot.

An interview was attempted at Police Headquarters with Russell. After being read his Miranda rights, Russell denied being involved in this incident and stated that he did not shoot anyone. Russell then requested to speak with an attorney prior before any further questioning.

Detective Christopher Burris # 1401

/S/ Christopher Burris

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Print Name

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Signature