


IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	22-001131
PROSECUTOR NO. :	095468574
OCN:	EO008884

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JARED M BAILEY)	
100 SW Gladstone Dr)	CASE NO. 2216-CR
Blue Springs, MO 64014)	DIVISION
DOB: 01/30/1979)	
Race/Sex: W/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

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 3, 2022, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Jarrod T. Young caused the death of Jarrod T. Young by shooting 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 (571.015-001Y20205299.0)

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 3, 2022, in the County of Jackson, State of

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Missouri, the defendant committed the felony of Murder in the Second Degree charged in Count 1, 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 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 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.


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/ Traci A. Stansell
Traci A. Stansell (#41903)
Assistant Prosecuting Attorney
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WITNESSES:

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3. PO Amanda Bates, 1100 SW Smith, Blue Springs, MO 64015
 4. PO Sterling Belknap, 1100 SW Smith, Blue Springs, MO 64015
 5. PO Nick Brooks, 1100 SW Smith, Blue Springs, MO 64015
 6. SGT Kyle Flowers, 1100 SW Smith, Blue Springs, MO 64015

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7. PO Will Gibson, 1100 SW Smith, Blue Springs, MO 64015
 8. PO Keegan Hughes, 1100 SW Smith, Blue Springs, MO 64015
 9. PO Coby Jacobsen, 1100 SW Smith, Blue Springs, MO 64015
 10. DET Martin Kreissler, 1100 SW Smith, Blue Springs, MO 64015
 11. DET Kevin Lange, 1100 SW Smith, Blue Springs, MO 64015
 12. PO Alex McIntyre, 1100 SW Smith, Blue Springs, MO 64015
 13. DET Rob Olson, 1100 SW Smith, Blue Springs, MO 64015
 14. DET Kate Tipton, 1100 SW Smith, Blue Springs, MO 64015
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STATEMENT OF PROBABLE CAUSE

FILED DIVISION 28 04-Mar-2022 15:10 CIRCUIT COURT OF JACKSON COUNTY, MO BY _____ DCA

DATE: March 4, 2022	Blue Springs Police Case Number	202
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-001131

I, **Det. Kevin Lange** a police officer with the Blue Springs 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 **March 3, 2022**, at **100 SW Gladstone Drive, Blue Springs, Jackson County, Mo 64014**, **Jared M. Bailey W/M 01-30-1979**, [REDACTED] of **916 NE Sunnyside Lane, Apt. C, Blue Springs, Mo 64014** committed one or more criminal offense(s).

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

On Thursday, March 3, 2022, at approximately 1743 hours, Blue Springs Police Officers were dispatched to 100 SW Gladstone Drive in reference a shooting.

Juvenile witness [REDACTED] called 911 for [REDACTED] Jared Bailey who had just shot his friend, Jarrod T. Young W/M 08-27-1974.

Prior to the officer's arrival, Mr. Bailey removed the magazine from the handgun and placed in on the porch. Officers immediately took Mr. Bailey into custody. Mr. Bailey was willing to give his statement, therefore he was transported to Headquarters, where Det. Kate Tipton conducted a Mirandized interview. A Springfield .40 cal. semiautomatic handgun was recovered.

On Thursday, March 3, 2022, at approximately 1905 hours, Detective Kate Tipton responded to the Blue Springs Detention Unit and escorted Mr. Bailey to an interview room. Mr. Bailey was provided his Miranda Warning and agreed to speak.

Mr. Bailey explained that the deceased party was Jarrod T. Young whom he's known since Mr. Bailey was 16 years old. Mr. Bailey explained that his wife and him have had some issues with their marriage which resulted in Mr. Bailey obtaining his own apartment in Blue Springs.

Mr. Bailey explained that Mr. Young had been in prison for 13-15 years for robberies and drugs and they reconnected during the summer of 2021. Mr. Bailey stated Mr. Young was living around 80th and Wornall and looking for a job.

Recently, Mr. Young asked Mr. Bailey if he could move in with him and Mr. Bailey agreed. Mr. Bailey said he confided in Mr. Young about his troubled marriage. Mr. Young told Mr. Bailey that he needed to move on and sleep with another woman.

Mr. Bailey stated he learned Mr. Young was unemployed and using drugs and told Mr. Bailey that Mr. Bailey would have to evict Mr. Young because Mr. Young had already received mail at his address and said that was two or three days ago, Mr. Bailey was having sexual intercourse with another woman and Mr. Young called Mr. Bailey's wife and told her. Mr. Bailey's wife came to the apartment and saw Mr. Bailey in bed with another woman and took Mr. Young back to the Bailey family residence at 100 SW Gladstone Drive, Blue Springs, Mo.

Mr. Bailey stated on Thursday, March 3, 2022, he took his son to dinner and his son told him that Mr. Young had cut wires in Mr. Bailey's pickup truck and was scaring him and mumbling to himself. Mr. Bailey said that dinner was cut short due to his son's information, and they went to the family residence. Mr. Bailey said when he walked into his garage and into his house, he observed Mr. Young in his wife's downstairs bedroom watching television. Mr. Bailey confronted Mr. Young and asked him why he cut the wires in the truck and told him to get out of the house.

According to Mr. Bailey, Mr. Young stood up and started walking toward Mr. Bailey. Mr. Bailey said that he told Mr. Young that Mr. Young was scaring him and to back up. Mr. Bailey said he drew his weapon and told him to get back. Mr. Bailey said Mr. Young kept coming toward him and Mr. Bailey shot Mr. Young somewhere in the lower torso.

Mr. Young turned slightly then continued to go toward Mr. Bailey. Mr. Bailey said Mr. Young said, "I'm going to fuck you up." Mr. Bailey said he shut his eyes and shot Mr. Young several more times as he walked backward and when he opened his eyes, Mr. Young was dead on the floor. Mr. Bailey said Mr. Young was taller and was larger in stature than him and had seen him fighting people in the past and was afraid of Mr. Young. Mr. Bailey said he had to shoot Mr. Young. Mr. Bailey indicated that he always carried his firearm on him and had his gun in his holster when he went to confront Mr. Young. Mr. Bailey said he didn't intend on using the weapon and that he was protecting himself and his family.

Det. Martin Kreissler escorted Juvenile witness, [REDACTED], his siblings and mother to Child Protective Center for a forensic interview.

On **Thursday, March 3, 2022**, at approximately **9:34 pm**, a **12-year-old** [REDACTED] [REDACTED] was interviewed at the Child Protection Center by a worker as a witness to this incident. The 12-year-old said, "Big Jared" (*Jarrod Young*) the victim was sitting on the 12-year old's mother's bed in her bedroom watching TV. The bedroom is downstairs, the door opens into the garage area. The 12-year-old was in their garage with his dad.

The 12-year-old told "Big Jared" he was trying to be the 12-year old's "dad". The 12-year old's dad Jared Bailey (the suspect), said to "Big Jared", not to "parent my kid". The 12-year-old said "Big Jared" got up from the bed and started heading towards his dad, who started backing up.

"Big Jared", asked the victim "why you running" as he was walking towards the victim with his fists "balled" up. The 12-year-old would say "Big Jared" is 6'4" or 6'5" a big guy, bigger than the 12-year old's dad. The 12-year-old said his dad took his pistol out shooting "Big Jared", two times in the head, one time in the shoulder, and a fourth shot hit the concrete floor in the garage bouncing up. The 12-year-old talked about "Big Jared" and his dad were at least 10 feet away from each other. The 12-year-old talked about "Big Jared" was going to strangle his dad.

The 12-year-old said his dad had the gun in a holster underneath his leather jacket. The 12-year old's dad went out to the front porch, took the clip out of the gun laying both the gun and clip on the porch. The 12-year old's father told him to call "911" which he did.

I, (Det. Kevin Lange), photographed and processed the scene. The victim, Mr. Young was found in the entry way leading from the garage into the basement foyer that leads into a basement bedroom. Mr. Young was lying in somewhat of a fetal position on his right side with head pointing to the east, his feet to the west. No weapons were found on the victim or in the immediate vicinity.

Noting that the victim, Mr. Young is supposed to be 6'04", and was supposedly advancing on Mr. Bailey, I could not locate any blood spatter six feet or higher off the ground on the walls, ceiling or doors. However, where Mr. Young's body lay, I observed on the garage entry door into the basement area, blood spatter only approximately two feet off the ground and showing directional towards the basement room (west).

Preliminary autopsy report indicates that the head shots to Mr. Young were made from the shooter in an elevated position showing a downward projectory into the body. Mr. Young had (9) bullet wounds, (7) of which were entry wounds. I was able to recover two spent casings from the downstairs basement room which were west of Mr. Young's body and two spent casings in the garage east of his body.

3.) I believe that defendant poses a danger to the community or to any other person because he has displayed potential of anger towards another human being by shooting a defenseless person.

Detective Kevin Lange #837

Printed Name

/s/ Kevin Lange

Signature