

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC22036328
PROSECUTOR NO. :	095470065
OCN:	HS033744

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ANDREW KEYVON YOUNG)	
3840 Bellefontaine Ave.)	CASE NO. 2216-CR
Kansas City, MO 64128)	DIVISION
DOB: 06/11/1993)	
Race/Sex: B/M)	
)	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200999.0)

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 June 1, 2022 at 12:05 PM, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Charles Bradham caused the death of Charles Bradham by shooting him. The State further gives notice that, should it submit Count 1 as felony murder, the underlying felony will be attempted robbery as charged in Count 6.

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 (571.015-001Y20205213.0)

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 June 1, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree as charged in Count 1, all allegations of which are incorporated here 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.

Count III. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.050, RSMo, committed the **class A felony of assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 1, 2022, in the County of Jackson, State of Missouri, the defendant shot Diane Daniel, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of Diane Daniel, an elderly person and special victim, and was done for the purpose of committing such assault.

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 IV. Armed Criminal Action (571.015-001Y20205213.0)

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 June 1, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree as charged in Count 3, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Assault in the First 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

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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.

Count V. Unlawful Possession Of A Firearm (571.070-001Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the **class D felony of unlawful possession of a firearm**, punishable under Sections 558.011 and 558.002, RSMo, in that on or about June 1, 2022, in the County of Jackson, State of Missouri, the defendant knowingly possessed a handgun, a firearm, and on October 7, 2013, the defendant was convicted of the class D felony of resisting arrest in the Circuit Court of Jackson County, Missouri.

The range 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 one (1) year 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 VI. Attempted Robbery - 1st Degree (570.023-001Y20201299.1)

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 B felony of attempted robbery in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about June 1, 2022, in the County of Jackson, State of Missouri, the defendant demanded US currency in the possession of Charles Bradham, and in the course thereof the defendant was armed with a deadly weapon, and such

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conduct constituted a substantial step toward the commission of class A felony of robbery in the first degree and was done for the purpose of committing robbery in the first degree.

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.

Count VII. 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 June 1, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Attempted Robbery in the First Degree as charged in Count 6, all allegations of which are incorporated here by reference, and the defendant committed the foregoing felony of Attempted Robbery in the First 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.

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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/ P. Benjamin Cox
P. Benjamin Cox (#60757)
Assistant Prosecuting Attorney
415 E. 12th St., Fl 7M
Kansas City, MO 64106
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BCox@jacksongov.org

WITNESSES:

1. Charles Bradham, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
2. [REDACTED],
MO 64106
3. PO William L. Edwards, 1125 Locust, Kansas City, MO 64106
4. DET Judith M. Harris, 1125 Locust, Kansas City, MO 64106
5. [REDACTED]
6. CIV Logan Konopasek, 1125 Locust, Kansas City, MO 64106
7. PO Chase H. Kuehl, 1125 Locust, Kansas City, MO 64106
8. DET Kari E. Mutschler, 1125 Locust, Kansas City, MO 64106
9. [REDACTED]
10. DET Christopher S Smith,
11. [REDACTED] 64106
12. CST Greg VanRyn, 6633 Troost, Kansas City, MO 64131
13. DET Jeremy D. Wells, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 06/09/2022

CRN: KC22036328

I, Detective J. Harris, #5824, of the 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 06/01/2022, at 4551 Colonial Terrace in
(Date) (Address)

Kansas City, Jackson County Missouri Andrew Young
(County) (Name of Offender(s))

B/M 06/11/1993 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 06/01/2022 at approximately 1206 hours, officers of the Kansas City, Missouri Police Department were dispatched to 4551 Colonial Terrace, Kansas City, Jackson County, Missouri 64129 in regard to a shooting. Upon arrival, officers located a male and a female inside the location suffering from apparent gunshot trauma. KCFD-EMS responded to the scene and declared the male victim deceased, and transported the female victim to an area hospital, where she was listed in stable condition. The crime scene was located inside 4551 Colonial Terrace. The scene was processed for evidence and two spent 9mm shell casings were located in the entry way of the residence. Two Budweiser beer bottles were located in the kitchen area, one in the trash can and one on a small table next to the trash can.

The female victim, [REDACTED] 01/01/1953, was contacted by detectives and she stated the following: [REDACTED] the deceased victim, had been talking to someone on Facebook in regard to purchasing a tan 2004 Mazda Protégé for \$450.00. [REDACTED] had been in contact with the seller via phone on the morning of the homicide. On 06/01/2022 a black male in his mid-twenties, wearing a tan puffy vest and jeans, came to their residence located at 4551 Colonial Terrace. She advised the male got himself a bottle of beer out of the refrigerator, drank it, and threw it away in their trash can. The male advised her husband the aforementioned vehicle broke down on either Eastern Avenue or Ozark Road, so [REDACTED] and the male left the residence together. They returned a short time later, and [REDACTED] got out his wallet to give the male gas money. The male pulled out a silver handgun and said "give me the money!" and pointed the handgun at [REDACTED]. She stated the male turned, shot her, turned back toward [REDACTED] and shot him before fleeing the scene in an unknown direction. She advised all the contact between [REDACTED] and the male was on her husband's cell phone, which was later located in his rear left pocket. She provided detectives with the pass code to [REDACTED] cell phone. The living female victim suffered from three gunshot wounds, one in leg and two in the abdomen.

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On 06/02/2022, [REDACTED] was shown a photo array containing six black males, all similar in appearance. It should be noted that Andrew Young B/M 06/11/1993 was photo #3. Daniel advised that person #3 looked familiar, but she could not be 100% certain. When asked where he looked familiar from, she advised she recognized him from coming in with [REDACTED].

Witness #1 was contacted by detectives and stated the following: she was working in a building in the area, and she walked outside to get something out of her vehicle. She heard “pop pop” followed by a man screaming “just give me the money!” She observed a black male with short hair, wearing basketball shorts and a dark colored shirt and white shoes, standing outside the door of the above listed address with a silver handgun in his hand. She observed the male turn around, grab the front door handle, and slam the door closed. She advised the male ran to a white SUV, occupied the driver’s seat, and squealed his tires as he left in an unknown direction. She instructed her co-worker to call 911 before going over to the unit the male was seen leaving. She and other neighbors located the unit with two shooting victims inside. She helped render first aid to the female victim, and she checked the deceased male’s pulse.

Due to the female victim advising they were supposed to buy a tan Mazda, officers conducted an area canvass for a vehicle matching the description. Officers located a 2004 tan 4-door Mazda Tribute bearing Missouri license plate RC6R0K at Skiles Avenue/Ozark Road with tow straps attached to it. The vehicle was illegally parked and abandoned blocking the flow of traffic. The vehicle was towed to the city tow lot.

While processing the scene, detectives located a cell phone in the rear left pants pocket of the deceased male. The cell phone was seized as evidence and transported to Police Headquarters (1125 Locust Street) for a download of digital data associated to the device by a KCPD Civilian Analyst. The pass code provided by the female victim was used to unlock the cell phone. During a search of the data on the cell phone, communication between the victim and the phone number 816-688-8213 on the day of the homicide was observed. The first phone call takes place on 06/01/2022 at 0904 hours, the 816-688-8213 phone number calls the victim. On 06/01/2022 at 0907 hours, the victim sends a text message to 816-688-8213 containing his address (“4551 colonial terrace kc mo 64129”). Four more phone calls were exchanged between the two. It was later determined the phone number was a Text Now Inc phone number. Facebook Messenger messages between the deceased victim and the seller of a 2004 Mazda via Facebook Marketplace were also observed. On 06/01/2022 at 9:03AM, the victim requests an address to come get the vehicle from and the seller responds with 4323 East Linwood Blvd. The seller’s profile showed to be the Facebook profile of Andrew Young with the profile picture being a black male wearing a white baseball cap and a dark colored vest over a white shirt. The Facebook Marketplace ad for the 2004 Mazda shows to have been posted by Andrew Young. The Facebook Marketplace ad pictures show the Mazda to be bearing Missouri license plate RC6R0K, matching the 2004 Mazda located by officers at Skiles Avenue/Ozark Road. Upon a search of Andrew Young’s Facebook profile, the civilian analyst located a “happy birthday” post made by Andrew Young to his mother. A computer search was conducted through Accurant for the name from his mother’s Facebook profile URL. The computer check revealed her to have an associate of **ANDREW YOUNG B/M 06/11/1993**. A computer check using MULES showed **YOUNG’S** Missouri DOR photo to match the photo of the male on the Facebook page. **YOUNG’S** DOR photo shows him to have short hair, which is consistent with the description of the suspect given by the female victim and witnesses.

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A computer check through MULES showed **Andrew YOUNG B/M 06/11/1993** to have several city warrants out of Kansas City, Missouri. On 06/02/2022 members of the Kansas City, Missouri Police Department were conducting surveillance in the area of E 39th Street/Bellefontaine Avenue when they observed **YOUNG** exit a residence located at 3840 Bellefontaine Avenue, Kansas City, Jackson County, Missouri. **YOUNG** was taken into custody without incident and placed on a 24 hour investigative hold for homicide. On 06/03/2022 detectives responded to East Patrol Detention (2640 Prospect Avenue, Kansas City, Jackson County, Missouri) to interview **YOUNG**. **YOUNG** was read his Miranda Warning verbatim via Form 72 P.D. **YOUNG** advised he understood his rights. **YOUNG** was shown a photo of a Facebook Marketplace posting for a tan 2004 Mazda and he advised he sold that vehicle to a white male on Wednesday (06/01/2022). He was also shown the Facebook page that was in contact with the victim under the name of Andrew Young, and he advised that was his Facebook page. **YOUNG** stated he provided the white male with an address off of Linwood Blvd to come purchase the vehicle. **YOUNG** advised once he sold the car at the Linwood address, he returned home to his residence on Bellefontaine Avenue and he did not leave the rest of the day. When asked if he had ever been to the Stadium View Apartments or the Colonial Terrace Apartments, he advised that is where the white male asked him to come pick him up from, but he told him he couldn't. **YOUNG** stated it has been years since he had been to those apartments and the only person he knows at those apartments is the male that he sold the car to. **YOUNG** stated he was not at those apartments on Wednesday (06/01/2022) and there would be no reason his DNA should be in the house. A search warrant for a DNA buccal swab from **YOUNG** was obtained through the Jackson County Circuit Court and executed during the interview.

On 06/03/2022 at 1223 hours, Judge Bird-Riley, of the Jackson County Circuit Court, signed a search warrant for the Maxwest cell phone seized from **YOUNG** upon his arrest. On 06/03/2022, the cell phone was given to a Kansas City, Missouri Police Department Analyst, The SIM Card information was downloaded by the analyst and the analyst located a photo on the cell phone that was taken on 06/01/2022 at approximately 1600 hours, of a black and silver handgun.

On 06/02/2022 at 1649 hours, Judge Bird-Riley, of the Jackson County Circuit Court, signed a search warrant for the data associated to aforementioned Text Now Inc phone number. The data was reviewed and showed the subscriber to show the username "andrewyoung1193" and the owner of the account to be Andrew Young with an e-mail address of andrewyoung1193@gmail.com. The phone calls and the one text message between this phone number and the victim appeared on the Text Now INC data.

On 06/08/2022 at approximately 1445 hours, I received a lab report notification indicating **YOUNG** was a contributor of DNA on a swab collected from a Budweiser beer bottle located inside of 4551 Colonial Terrace the day of the homicide. The lab report states "the DNA results provide very strong support for the scenario that **ANDREW YOUNG** is a contributor of DNA from item 014, swab, Budweiser Beer Bottle, -Table, versus the alternative scenario. The genetic profile from item 014 is 200 septillion times more likely to be observed if **ANDREW YOUNG** is the contributor than if an unknown individual is the contributor."

YOUNG is a convicted felon in the state of Missouri for the following: tampering with a motor vehicle-1st degree, robbery-2nd degree, tampering with a motor vehicle-1st degree, trafficking in drugs in the second degree, tampering with a motor vehicle-1st degree, property damage 1st degree, and resisting arrest/detention/stop by fleeing-creating a substantial risk of serious injury/death to any person all in the Jackson County Circuit Court.

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Printed Name Detective J. Harris, #5824 Signature /s/Detective J. Harris, #5824

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

Judge

Circuit Court of _____ County, State of Missouri.