

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

POLICE NO. :	KC2200746
PROSECUTOR NO. :	095468957
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
SHYRONE H DANIELS)	
5016 E 40th St.)	CASE NO. 2316-CR
Kansas City, MO 64127)	DIVISION
DOB: 03/27/2004)	
Race/Sex: B/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 on or about January 27, 2022, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing death or serious physical injury to Desmond Matthews, caused the death of Desmond Matthews 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.

State vs. Shyrone H Daniels

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 on or about January 27, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree as charged in Count I, 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.

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.

State vs. Shyrone H Daniels

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ P. Benjamin Cox
P. Benjamin Cox 60757
Assistant Prosecuting Attorney
415 E. 12th Street
Floor 7M
Kansas City, MO 64106
bcx@jacksongov.org

WITNESSES:

1. PO Brady J. Bremer, 1125 Locust, Kansas City, MO 64106
2. DET Clyde M. Harvey Jr., 1125 Locust, Kansas City, MO 64106
3. [REDACTED] Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
4. Desmond Matthews, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
5. [REDACTED]
[REDACTED]
[REDACTED] 12th St, Floor 11, Kansas City, MO 64106
8. PO Jordan T. Witcig, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 02/08/2022

CRN: KC22005746

I, Det. Clyde Harvey #5596 Kansas City Missouri Police Department, Homicide Unit
(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 01/27/2022, at 3027 Van Brunt Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Shyrone H. Daniels
(County) (Name of Offender(s))

B/M 03/27/2004 committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 01/27/2022 at 1818 hours, officers of the Kansas City Missouri Police Department were dispatched to **3027 Van Brunt (BP Service Station), Kansas City, Jackson County, Missouri** in regard to a shooting. Upon arrival, officers observed the victim (later identified as Desmond Matthews B/M 04/03/2004) laying partially inside a silver Dodge Charger bearing Missouri temporary tag 05MK6W and V.I.N. of 2B3CA3CV7AH237568. Officers approached the vehicle and upon further investigation, observed the victim severely bleeding from a neck wound. Officers began to render aid (to the victim) as EMS was requested but upon EMS arrival, the victim was declared deceased (at 1822 hours).

Officers responding to the scene made contact with the BP service station clerk, as they were granted access to the surveillance cameras throughout the listed service station. While reviewing video surveillance, officers observed a gray Mazda four door sedan bearing Missouri license plate CW9 Y6G pull into the parking lot and park on the south side of the building (prior to the shooting). The service station surveillance showed a black male (wearing a black hooded sweatshirt and black sweatpants) exit the front passenger seat of the Mazda, and walk towards the south entrance door. An additional occupant of the Mazda (appeared to be a black male wearing a dark blue hooded sweatshirt, gray sweatpants and white sandals) exited the rear passenger seat and also walked towards the south entrance door prior to the shooting.

Detectives responded to 3027 Van Brunt Boulevard and were briefed by responding officers. While reviewing surveillance cameras from the BP service station, detectives observed the listed silver Dodge Charger pull into the south parking lot (at 1816 hours) and park on the north side of the building. The driver of the Dodge Charger (victim), exited the vehicle (wearing a black jacket and blue jeans) and entered the service station using the north entrance door. Shortly after the Dodge Charger arrived, the listed gray Mazda sedan is observed entering the south lot and parked near the south entrance of the service station. As the Mazda parked, a black male (Subject #1/ wearing a black hooded sweatshirt and black sweatpants) is observed exiting the front passenger seat of the Mazda. As Subject #1 approached the south entrance door, another black male (Subject #2/ wearing a dark colored hooded sweatshirt and gray sweatpants) is observed exiting the rear passenger seat. Both Subjects #1 and #2 enter the service station in numerical order.

As Subject #1 walked (east) down an aisle, Subject #2 is observed walking beyond the aisles to the north entrance door as he immediately looked out the north door (window). Subject #2 quickly returned to the middle aisle where he came face to face and confronted the victim. After the confrontation, the victim appears to walk towards the cash register (along the west wall) with items in his hands and upon passing Subject #2, a handgun was presented (by Subject #2) from his sweatshirt pocket and pointed at the victim. The surveillance showed Subject #2 shot towards the victim (with the handgun in his left hand) striking him in the neck and upper back (left shoulder). As Subject #2 continued shooting at the

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victim inside the service station, the victim ran out of the north exit door at which time Subject #2 ran out of the south exit door. Shortly after exiting the north door, the victim is observed pointing and shooting a handgun (in his right hand) at the door while still running towards the northeast corner of the parking lot. Subject #1 is seen leaving the service station on the south entrance.

The surveillance also shows an unknown occupant (Subject #3/ wearing a black jacket with a gray facemask and a red hooded jacket underneath) exit the passenger side door of the Dodge Charger around the time the victim ran out of the north door. Subject #3 is observed crouching down at the rear of the listed vehicle and has what appears to be a handgun in his right hand. The victim stopped at the rear of the service station parking lot and ran to the passenger side of the Dodge Charger. The victim is seen occupying the passenger seat, and as he entered the vehicle, he dropped a handgun on the ground. Subject #3 remained in a crouched position and as the victim's handgun hit the ground, Subject #3 immediately retrieved the victim's handgun and ran towards E 30th Terrace (northeast corner of the service station).

As Subject #3 fled the scene, the victim is observed exiting the passenger seat of the Dodge Charger. The victim appears to stagger around the rear of the vehicle as he ran to the driver side door. The surveillance shows the victim opening the driver's side door, at which time he collapsed (partially on the driver's seat).

While processing the crime scene, detectives observed and recovered multiple 9mm Luger shell casings inside the BP service station. Detectives also observed apparent blood on the outside of the Dodge Charger's driver side door. Two (2) .45 caliber shell casings were observed near the rear (northeast corner) of the service station. While holding the perimeter of the crime scene, officers were contacted by [REDACTED] (the owner of gray Mazda/mother of [REDACTED]). [REDACTED] advised that her Mazda was being driven by [REDACTED] at the time of the shooting. [REDACTED] contacted [REDACTED] P at which time [REDACTED] responded back to the scene [REDACTED] and [REDACTED] were transported to 1125 Locust (KCPD Headquarters) for a formal statement. The listed Mazda was towed to the City Tow Lot for processing.

Upon completion of [REDACTED]'s interview, [REDACTED] was escorted to an interview room where she agreed to provide her formal statement. [REDACTED] stated on 01/27/2022, she borrowed her mother's vehicle as her vehicle was having radiator issues. While using [REDACTED] vehicle, [REDACTED] drove to [REDACTED]'s (her [REDACTED] apartment at 3221 Denver Avenue (on 01/27/2022)). [REDACTED] stated while at [REDACTED]'s apartment [REDACTED] (younger brother of [REDACTED]) was also at the residence with his friend (whom she never seen before). [REDACTED] stated [REDACTED] approached her and asked if she could take them to the store in exchange for \$10 at which time [REDACTED] agreed. Due to BP service station being in close proximity of [REDACTED]'s apartment [REDACTED] drove there and upon arrival, entered from the south lot (which is consistent with surveillance footage). [REDACTED] observed [REDACTED] and his friend exit the vehicle and upon exiting the car, [REDACTED] heard [REDACTED] tell his friend to conceal his gun. As [REDACTED] looked to the friend, she observed a handgun partially concealed in his pocket. [REDACTED] stated she remained in the vehicle as she began texting another friend. While inside her vehicle, [REDACTED] heard two apparent gunshots that sounded as if they were coming from the east of the gas station. [REDACTED] then heard six to eight gunshots and believed they were between different people due to the frequency and pattern by which the shots were fired. After the shots, [REDACTED] observed the friend run outside and fall onto the ground. [REDACTED] stated [REDACTED] T quickly followed his friend out of the store but as she realized the exchange of gunfire, she drove away from the service station without [REDACTED] and his friend in the vehicle. As [REDACTED] left the south lot, she observed [REDACTED] and his friend running towards the vehicle at which time she stopped and allowed them to enter. As both [REDACTED] and his friend occupied the vehicle, [REDACTED] asked what happened. As the friend attempted to answer her question [REDACTED] interjected as he was heard yelling at his friend for getting [REDACTED] and the vehicle involved. [REDACTED] dropped both [REDACTED] and his friend off at [REDACTED]'s apartment at which time she called [REDACTED]

Detectives made contact with [REDACTED] who was at the listed location pumping gas. [REDACTED] was transported to Police Headquarters where she agreed to provide a formal statement. [REDACTED] stated while at the service station (pumping gas) she started hearing gunshots [REDACTED] stated she observed a black male shooting from the door of the gas station and appeared to be shooting at the car that was parked in front of her vehicle. [REDACTED] stated she observed the victim to have a gun in his hand and what appeared to be blood around his mouth but she stated she did not see the victim shoot back. [REDACTED] stated she observed the victim run around the back of his car and run to the passenger side.

Detectives made contact with [REDACTED], the store clerk of the BP service station [REDACTED] stated while behind the counter with [REDACTED], their attention was drawn to three (3) unknown black males who appeared to be arguing with one another. [REDACTED] he

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then heard 3 or 4 shots fired inside the store by a young black male who [redacted] described as "not being legal." [redacted] stated he heard more shots fired outside but he didn't count them.

Detectives completed a computer search of [redacted] which revealed a 2021 Kansas City police report. In the report, [redacted] was listed as a victim and he was determined to be a former resident in the NW Regional Youth facility. Detectives contacted [redacted] (a manager of the facility) and provided a still shot of the individuals that entered the store. [redacted] advised the person in the photograph (that walked in the store with [redacted] and later pulled a handgun from his sweatshirt pocket to shot the victim) was **Shyrone Daniels B/M 03/27/2004**. [redacted] stated she is the case manager for **Shyrone** and knows him to stay with his mother. [redacted] also stated **Shyrone** is on probation for a previous conviction for 1st degree robbery. [redacted] also stated [redacted] is the case manager for [redacted], in which [redacted] acknowledged. [redacted] stated prior to detectives contacting her, [redacted] called and told her that an old classmate done something and he ([redacted]) was wanting to clear his name.

Detectives received a phone call from [redacted] regarding the request of [redacted] (to clear his name). Detectives made contact with [redacted] shortly after and an interview was scheduled so [redacted] could provide his formal statement. [redacted] responded to Police Headquarters (1125 Locust) and upon arrival, he was escorted to an interview room. [redacted] was informed that the statement was voluntary and that he was free to leave at any moment during the interview. [redacted] stated he understood and agreed to provide his statement. [redacted] initially stated he didn't know **Shyrone Daniels** but after further questioning, [redacted] stated he and **Shyrone** was in the Division of Youth Services together. [redacted] also stated **Shyrone** stayed with him multiple days while he was at [redacted]'s (sister of [redacted]) apartment. [redacted] stated when [redacted] stopped by to visit [redacted] **Shyrone** asked if she could take them to the store and she agreed. [redacted] stated [redacted] drove to the gas station located at **3027 Van Brunt Blvd (BP)** and upon arrival, both [redacted] and **Shyrone** exited the vehicle and entered the store. As they entered the store [redacted] overheard **Shyrone** say he was having "problems" with a male inside the store. [redacted] stated as he walked to the rear of the store, he heard **Shyrone** say "that's Dezo" and "that was that." [redacted] stated he heard three (3) to four (4) gunshots as he immediately "ducked" down. As [redacted] looked up, he noticed no one remained inside, at which time he exited the store. [redacted] stated he ran towards the vehicle driven by [redacted] and as he approached the vehicle, he noticed **Shyrone** was already inside. Throughout the interview, [redacted] continued to reiterate that he was innocent and had nothing to do with the shooting. [redacted] stated he knew **Shyrone** had a gun (prior to the shooting) because he made **Shyrone** put the gun in [redacted]'s closet (while a [redacted] apartment). [redacted] was presented a picture of **Shyrone** and [redacted] confirmed that he was the friend that was with him. [redacted] was also presented a picture of the victim and [redacted] said, "That's the dude it happened to" and replied "that's Dezo." Upon completion of the interview, [redacted] was escorted to the lobby where he left Police Headquarters.

On 01/28/2022, a Warrant for Apprehension and Detention, as well as a Contact and Advise entry was issued for **Shyrone**. Law Enforcement Resource Center continued receiving information regarding possible addresses for **Shyrone**. On 03/16/2022, a residence check at 8140 N Hickory #11033 was conducted, at which time **Shyrone** was located and placed under arrest for his outstanding warrant. **Shyrone** was transported to the Jackson County Juvenile Detention Center where he was booked under his warrant. On 03/17/2022, detectives made contact with [redacted] of **Shyrone**) who declined detective's permission to speak with **Shyrone**.

Printed Name Det. Clyde Harvey #5596 Signature /s/ Det. Clyde Harvey #5596

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

Judge

Circuit Court of _____ County, State of Missouri.