

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

POLICE NO. :	KC23015528
PROSECUTOR NO. :	095473842
OCN:	

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
JAYLEN E MCDANIEL)	
11577 Food Lane)	CASE NO. 2316-CR
Kansas City, MO 64134)	DIVISION
DOB: 03/07/1992)	
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 on or about March 13, 2023, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to T.T., caused the death of T.T. by shooting her.

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 on or about March 13, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, all

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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.

Count III. Endangering The Welfare Of A Child Creating Substantial Risk- 1st Degree - 1st Offense - No Sexual Conduct (568.045-005Y20203899.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class D felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about March 13, 2023, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED], DOB 01/[REDACTED]/2010, a child less than seventeen years of age, by discharging a firearm multiple times within the same room in which [REDACTED], DOB 01/[REDACTED]2010, was present in.

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.

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Count IV. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, 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 March 13, 2023, in the County of Jackson, State of Missouri, the defendant knowingly possessed a black Palmetto Armory Rifle, a firearm, and on April 18, 2022, the defendant was convicted of the felony of resisting arrest in the County of Jasper, State of 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.

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/ Hallie L. Schuman

Hallie L. Schuman (#66333)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4488
HSchuman@jacksongov.org

WITNESSES:

1. DET Nicole M. Anderson, 1125 Locust, Kansas City, MO 64106
2. PO Curtis Farmer, 1125 Locust, Kansas City, MO 64106
3. LBT Tiffany Lewis, 1125 Locust, Kansas City, MO 64106
4. CST Pamela Owens, 1125 Locust, Kansas City, MO 64106
5. PO Joshua M. Sandifer, 1125 Locust, Kansas City, MO 64106
6. CST Kelli Sharp, 2645 Brooklyn, Kansas City, MO 64127
7. PO Valerie K. Tirado, 1125 Locust, Kansas City, MO 64106
8. PO Allan E. Walker-Perkinson, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 03-24-23

CRN: KC23015528

I, Detective Nicole Anderson #5715, 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 03-13-2023, at 11577 Food Lane in
(Date) (Address)

Kansas City, Jackson County Missouri Jaylen E. McDaniel
(County) (Name of Offender(s))

B/M 03-07-1992 committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 03-13-2023 at approximately 0758 hours, officers of the Kansas City, Missouri Police Department were dispatched to 11577 Food Lane, Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, officers observed the victim, Trianna Tisdale, inside the residence suffering from apparent trauma. Tisdale was transported by ambulance to a local hospital where she was pronounced deceased.

A juvenile witness was located on scene and had called the police. The juvenile witness stated he heard Tisdale and Tisdale’s boyfriend, Jaylen McDaniel, arguing. The juvenile witness observed McDaniel hit Tisdale in the face while they were arguing in the living room and he heard her say she was going to call the police. The juvenile witness observed McDaniel fire shots toward Tisdale before seeing Tisdale fall to the ground. The juvenile witness described McDaniel’s gun as a tan pistol. While Tisdale was on the ground, the juvenile witness observed McDaniel remove her car keys from around her wrist and flee the scene in Tisdale’s car. The witness described Tisdale’s vehicle as a brown Impala.

In the living room of the residence, detectives observed approximately four spent 9 MM shell casings. There was apparent blood on the living room floor and three apparent bullet holes in the living room wall. On the kitchen counter, to the north of the living room, there was a bottle of Hoppe’s 9 Gun oil. Upstairs, in the southeast bedroom, a black Palmetto Armory Rifle serial # SCB931788 was located near the wall.

On 03-14-2023 Detectives located Tisdale’s vehicle, a 2009 Chevrolet Impala, with Kansas license 316KRV and VIN 2G1WB57KX91171230. The vehicle was unoccupied and parked near the intersection of East 76th Street and Troost Avenue, Kansas City, Jackson County, Missouri. The vehicle was towed to the Kansas City Tow Lot located at 7750 E Front Street, Kansas City, Jackson County, Missouri. A search warrant was applied for and granted to search and process the vehicle.

While processing the Chevrolet Impala, Detectives observed a pair of black and blue Nike tennis shoes on the driver’s floor board. A red and blue jacket with the number “23” on the front was located in the back seat of

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the vehicle. McDaniel's Kansas driver's license was located in between the driver's seat and the front console, as well as, various documents with McDaniel's name on them.

Tisdale had an apparent defect to her to her left cheek, an apparent defect to the left side of her head, and an apparent defect to the right side of her neck.

A computer check of Jaylen McDaniel revealed that on or around 04-30-2012 he was convicted for aggravated battery; bodily harm with a deadly weapon in the Labette County District Court CRN 11CR272PA. It also listed him as a multi-state offender. McDaniel pled guilty to a class E Felony on or around 04-18-22 for Resisting/ Interfering with arrest out of Jasper County CRN 19AP-CR01027-01.

Printed Name Detective Nicole Anderson #5715 Signature /S/ Detective Nicole Anderson #5715

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

Judge

Circuit Court of _____ County, State of Missouri.