

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

POLICE NO. :	KC23044915
PROSECUTOR NO. :	095475158
OCN:	HU013744

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
TYRELL L. YOUNG,)	
3721 South Benton)	CASE NO. 2316-CR
Kansas City, MO 64128)	DIVISION
DOB: [REDACTED])	
Race/Sex: B/M)	
S.S.N.: [REDACTED])	
)	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 July 10, 2023, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to Confidential Victim, caused the death of Confidential Victim by shooting him, and defendant is further given notice that should the State of Missouri submit murder in the second degree - felony murder under Section 565.021.1(2), it will be based on the death of Confidential Victim as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

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 July 10, 2023, 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 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. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about July 10, 2023, at 7332 East US 40 HWY, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at another person, Confidential Victim, and, as a result of the above described conduct, Confidential Victim suffered injury or death.

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 July 10, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of unlawful use of a weapon 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. Tyrell L Young, Case No.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ John G. Gromowsky
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WITNESSES:

The State's witnesses as of 7/12/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 07/11/2023

CRN: KC23044915

I, Detective [REDACTED], 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 07/10/2023, at [REDACTED] in
(Date) (Address)

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

B/M [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

Murder

The facts supporting this belief are as follows:

On 07/10/2023 at approximately 1134 hours officers were dispatched to 7332 East US 40 Highway, Kansas City, Jackson County, Missouri, on a reported shooting. Upon arrival, they located a male, later identified as [REDACTED], suffering from apparent gunshot trauma. [REDACTED] was declared deceased by KCFD-EMS on scene and Homicide 990 squad responded to investigate.

Witness #1 stated that he was on the lot at [REDACTED] when he heard the sounds of gunshots. He checked his security feed from his and the adjacent lot and noticed a male lying motionless on the ground. He called 911 and then Witness #2, who sub-leases [REDACTED] from Witness #1.

Witness #1 signed a Consent to Search for his property and provided investigating Detectives with video surveillance from the business.

Witness #2 stated that he is the renter of lot [REDACTED] and runs his auto shop business out of there, along with Witness #3. Witness #2 stated that he, Witness #3 and the Deceased (Witness #3 brother) all work together as mechanics at the listed address and crime scene. Witness #2 stated that on 07/10/2023, he and Witness #3 needed to run some errands and get food for everyone and they left the shop approximately ten minutes prior to the shooting. The Deceased wanted to continue working on the vehicle he had started on that morning so he chose to stay behind at the shop. Within five to ten minutes of being gone, Witness #2 received a phone call from Witness #1 advising him that someone was injured on the property and emergency responders were present. Witness #2 pulled up the video surveillance on his phone and observed the Deceased on the ground. Witness #2 returned to the scene and contacted Police on scene.

Witness #2 also provided a formal statement at Police Headquarters. Witness #2 explained that he and Witness #3 both own and operate the auto shop and sub lease the property from Witness #1. Witness #2 advised that he and Witness #3 both work in the same space but they each specialize in different things and generally operate independently of one another.

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Witness #2 stated that he had reviewed the surveillance video of the shooting and recalled the following: approximately one month prior, a customer of Witness #3's, later identified as **Tyrell L. Young** walked in to the shop extremely irate. The customer identified himself at the time as the "owner of the Camaro" and demanded to speak with Witness #3 about the fact that the entertainment system had been stolen out of his vehicle and wanting to remove the Camaro from the lot. Witness #2 explained to **Tyrell L. Young** that he did not have access to Witness #3's vehicles and keys and offered to call Witness #3 and ask him to come to the business to speak with **Tyrell L. Young**. Witness #2 stated **Tyrell L. Young** became increasingly irate with Witness #2 and proceeded to pull a black handgun and point it at Witness #2's face threatening to kill him. Witness #2 stated that after calling Witness #3 in front of **Tyrell L. Young**, he relayed that Witness #3 agreed to return to the shop. **Tyrell L. Young** waited for Witness #3 approximately fifteen minutes before leaving.

Upon watching and listening to the surveillance video from 07/10/2023, Witness #2 stated that he could not see the shooter's face well enough but he recognized the voice and speech to be the same as the owner of the Camaro he was referencing from the month prior.

Witness #3 stated that he is the biological brother of the Deceased. He explained that the Deceased had only been in the United States for a little less than six months and in Kansas City for approximately three months. The Deceased had been working as a mechanic at the shop with Witness #2 and #3 since he arrived in Kansas City.

Witness #3 stated that approximately eight months prior, **Tyrell L. Young** brought in his 1997 grey Chevrolet Camaro to the shop. Witness #3 advised he had known **Tyrell L. Young** for several years but did not know his actual name. He simply had him saved in his phone as "Padres Camaro" meaning "father of Camaro." Witness #3 explained that he had worked on several different vehicles belonging to **Tyrell L. Young**, who he had met through his father "Rickey" and an "Uncle Lee."

Witness #3 confirmed that the stereo had been stolen out of **Tyrell L. Young's** Camaro approximately one month prior along with stereos from other vehicles on the lot. Witness #3 stated based on his interactions with **Tyrell L. Young** after that, he did not perceive **Young** to be irate. Witness #3 stated that on 07/09/2023, **Tyrell L. Young** called him and told him he wanted to take pictures of the Camaro in order to list it for sale and needed to take it off the lot. He then asked Witness #3 when he would be at the shop. Witness #3 told him he would be at the shop beginning early morning on 07/10/2023 but the two never agreed on a specific time. Witness #3 did not have any other communication with **Tyrell L. Young** after that phone call, which is why he did not see an issue with leaving the lot briefly.

Based on his familiarity with the **Tyrell L. Young**, I showed him a single photograph of **Tyrell L. Young** in an effort to identify the owner of the Chevrolet Camaro. He identified the photograph as the owner of the only Chevrolet Camaro on the lot and that in question.

At the time of Witness #3's formal statement, he explained that he had not yet seen the video surveillance of his brother's shooting. I played a brief audio portion of the interaction between **Tyrell L. Young** and the Deceased, in which **Tyrell L. Young** can be heard asking for Witness #3 by his first name.

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Witness #3 stated he recognized the two voices in the video as one belonging to his brother and the other belonging to **Tyrell L. Young**. He stated he was positive it was **Tyrell L. Young's** voice as they often communicate via phone and had done so as recently as the day prior.

Witness #3 also provided a phone number for **Tyrell L. Young** as well as a general area of where he knew **Tyrell L. Young** to live. Witness #3 was unsure of the house numbers but provided rough landmarks, which narrowed down the area to be within a few blocks east of Prospect Av and a few blocks south of E 34th St. He added that the house sat high from the street, was on the east side and mid block.

This description closely matched an address **Tyrell L. Young** was recently associated with.

During the course of the investigation, the case Detective also reviewed video and audio surveillance from the scene and noted the following:

Tyrell L. Young is observed arriving at the shop by driving a dark Chevrolet Trax and parking it in the driveway in front of the gates. He then proceeds to walk through the open lot and to the entrance to the body shop. There he is heard asking the Deceased if Witness #3 was there. The Deceased can be heard replying that he does not speak English. **Tyrell L. Young** asks the Deceased to get ahold of Witness #3 several times and mentions that he needs to take pictures of his Camaro and get it out of the lot. The Deceased is observed walking from the body shop into the open lot patting his pockets as if feeling for a phone. At this time, **Tyrell L. Young** can be seen walking from the same direction towards his parked Camaro. Approximately forty seconds later, the Deceased returns to the open area of the lot holding a cell phone which he appears to operate. **Tyrell L. Young** can be seen walkign towards him as he begins to talk about a TV being gone from his vehicle and tells the Deceased to call Witness #3 again as he begins lifting the front of his shirt. Seconds later, one ghot is heard and the Deceased is observed bending at the waist and backing away from **Tyrell L. Young**. **Tyrell L. Young** continues to shoot the Deceased multiple times, punch and pistolwhip him. The Deceased attempts to fight back as he collapses to the ground. Once on the ground, **Tyrell L. Young** gets on top of the Deceased and proceeds to punch him numerous times as the Deceased is lying motionless.

During this time, **Tyrell L. Young's** handgun is observed to fall to the ground and pieces of it scatter around the Deceased's body. **Tyrell L. Young** picks up his firearm and ejected magazine off the ground before driving away westbound on [REDACTED].

Six 9mm shell casings and one live 9mm live round were recovered from the scene. A weapon mounted light and "Glock" backstrap were also recovered from around the Deceased's body.

Search warrants were obtained for **Tyrell L. Young's** residence and vehicle. **Tyrell L. Young** was taken into custody on 07/10/2023 during the execution of the search warrant at his residence and transported to Police Headquarters. **Tyrell L. Young** was read his Miranda rights verbatim and provided a statement.

Tyrell L. Young initially denied owning a Chevrolet Camaro or being involved in any altercations earlier in the day.

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After being confronted, **Tyrell L. Young** admitted to his Camaro being in a repair shop for approximately one year but would not say which shop and who the mechanic was. He repeatedly expressed his dissatisfaction with the mechanic and his other employees were treating him and felt that people kept pushing him and his buttons in an effort to have him go to jail.

After **Tyrell L. Young** continued to deny being at the crime scene on 07/10/2023, I played a short portion of the audio from the surveillance video for him. As his voice can be heard asking the Deceased to call Witness #3 and mentioning his Camaro, **Tyrell L. Young** reacted to it by uttering "Y'all got me on record?"

After repeatedly being confronted with evidence, **Tyrell L. Young** admitted to having the conversation with Witness #3 over the phone regarding coming over to photograph his Camaro with the intention of taking it out of the lot. When **Tyrell L. Young** arrived at the body shop the morning of 07/10/2023, he became upset that Witness #3 was not there. He felt that the Deceased was playing games with him by pretending to not speak English. He continued to state that he believed foreigners and Mexicans sitck together and were treating him in disrespectful ways because he felt like he was getting the run-around.

I asked **Tyrell L. Young** if he had ever met the Deceased previously and he stated that he had not but believed that the Deceased might have been the one who stole the TV/entertainment system out of his vehicle. **Tyrell L. Young** also admitted to having no proof or indication as to why he would think that, other than the fact that the Deceased worked at the shop.

Tyrell L. Young described his interaction with the Deceased as "acting like he was going to call" Witness #3 but **Tyrell L. Young** didn't feel like that was actually happening.

When asked about the altercation, **Tyrell L. Young** first denied there being one altogether before first admitting that he was involved in a physical altercation and ultimately that he shot the Deceased.

Tyrell L. Young continuously offered that he was justified in his action because it was "self-defense" due to the fact that the Deceased "swung on him" as well as believing that he did not know what people who give you the run-around like that over the phone are capable of.

Tyrell L. Young did not know how many times he fired or how many times he punched the Deceased after he had shot him but stated the injuries to his knuckles were sustaiend during the altercation.

During the execution of the search warrant on **Tyrell L. Young's** residence, the following items of evidentiary value were recovered:

- Black Gen 5 Glock 19, 9mm pistol with a live round matching the head stamp of casings at the scene
- Items of clothing with apparent blood matching the description from the video
- Paperwork with Witness #3 name indicating Witness #3 owed him money

PROBABLE CAUSE STATEMENT FORM

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Printed Name ██████████ Signature /s/██████████

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

Judge

Circuit Court of _____ County, State of Missouri.