

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

POLICE NO. :	2023-67450
PROSECUTOR NO. :	095476180
OCN:	QO012801

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
TYLER CHRISTOPHER RIZER)	
229 SE Westminster Rd)	CASE NO. 2316-CR
Blue Springs, MO 64014)	DIVISION
DOB: [REDACTED])	
Race/Sex: B/M)	
S.S.N.: [REDACTED])	
)	DEFENDANT.

AMENDED COMPLAINT

**Count I. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim
(565.050-001Y20201399.0)**

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 assault in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] by stabbing him, and in the course thereof defendant inflicted serious physical injury to [REDACTED].

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 on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count One, all allegations of which are incorporated herein by reference,

and the defendant committed the foregoing felony of assault by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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 - 3rd Degree - Special Victim (565.054-001Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the class D felony of assault in the third degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to ■■■ (a minor child) by strangling ■■■.

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 IV. Assault - 3rd Degree (565.054-002Y20201304.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.054, RSMo, committed the class E felony of assault in the third degree, punishable upon conviction under

Sections 558.002 and 558.011, RSMo, in that on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused physical injury to [REDACTED] by grabbing her throat.

The range punishment for a class E 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 four (4) 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 V. 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 September 29, 2023, in the County of Jackson, State of Missouri, the defendant with the purpose of causing serious physical injury to Juavvion L Bagsby, caused the death of Juavvion L Bagsby by shooting him and the defendant is further given notice that should the State submit murder in the second degree -- felony under Section 565.021(2), it will be based on the death of Juavvion L Bagsby as a result of the immediate flight from of the class D felony of assault in the third degree under Section 569.160, 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 VI. 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 on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count Five, 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 VII. Assault 1st Degree Or Attempt - Serious Physical Injury Or Special Victim (565.050-001Y20201305.0)

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 assault in the first degree, punishable upon conviction under Sections 558.011, RSMo, in that on or about on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to [REDACTED] by shooting Jorge Recio-Leyva.

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 VIII. 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 on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count Seven, all allegations of which are incorporated herein 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 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 IX. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building (571.030-020Y20205299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030, RSMo, committed the class B Felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about September 29, 2023, at 4200 S Osage St, in the County of Jackson, State of Missouri, the defendant, knowingly shot a firearm at a habitable structure, residence or at another person, [REDACTED].

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 X. 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 on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of unlawful use of a weapon charged in Count nine, 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.

Count XI. Stealing - Motor Vehicle/Watercraft/Aircraft (570.030-038Y20202499.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant appropriated 2017 Chevrolet Impala, a motor vehicle, which property was owned by Juavvion L Bagsby, and the defendant appropriated such property without the consent of Juavvion L Bagsby and with the purpose to deprive him thereof.

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 XII. Leaving Scene Of Accident - Physical Injury (577.060-001Y20205499.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 577.060, RSMo, committed the class E felony of leaving the scene of an accident, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about September 29, 2023, the defendant, while operating a motor vehicle on a highway located at or near 17th St and Jackson Ave, in the County of Jackson, State of Missouri, was involved in an accident that resulted in physical injury to [REDACTED]- [REDACTED], and the defendant knew that such accident had occurred, and the defendant left the place of the

accident without stopping and giving defendant's name, residential address, and operator's license number to such person.

The range punishment for a class E 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 four (4) 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 XIII. Vehicle Hijacking (570.027-002Y20201212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.027, RSMo, committed the class B felony of Vehicle Hijacking, punishable upon conviction under Section 558.011, RSMo, in that on or about September 29, 2023, in the County of Jackson, State of Missouri, the defendant attempted to seize possession or control of a 2017 Chevrolet Malibu by assaulting and threatening [REDACTED] who was in control of the 2017 Chevrolet Malibu.

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.

The facts that form the basis for this information and belief are contained in the previously filed statement(s) of facts, incorporated herein and submitted as a basis upon which this court may find the existence of probable cause.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Jeremy J. Baldwin
Jeremy J. Baldwin (#62734)
Assistant Prosecuting Attorney
321 West Lexington Avenue
Independence, MO 64050
(816) 881-4592
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WITNESSES:

State vs. Tyler Christopher Rizer, Case No. 2316-CR04136

The State's witnesses as of 10/13/2023 are included on the "State's Witness List" filed contemporaneously with this Amended Complaint.

30-Sep-2023 14:03

CIRCUIT COURT OF JACKSON COUNTY, MO

BY Janetta A. Ader DCA

PROBABLE CAUSE STATEMENT

Date: 9/30/2023

Report #: 2023-67450

I, Thomas Burchfield, a Detective with the Independence, Missouri, 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 9/29/2023, at 1800 hours, Tyler C. Rizer , (Race- Black, Sex- Male, committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 9/29/2023, at approximately 1810 hours, Officers with the Independence Police Department were dispatched to the area of 40th Terr and S Osage Street regarding a stabbing. Officers located a white male (Victim #1) in a yard suffering from apparent stab wounds. Bystanders on scene advised that the suspect was last seen running south across Interstate 70.

Victim #1 told the officers that he was giving a ride to a black male with brown hair when that male threatened him while in his vehicle and they were traveling west on Interstate 70. Victim#1 stated he pulled his vehicle over along the Interstate and ran with the black male chasing him.

Officers also located a knife with a silver blade and black handle in the yard next to where Victim#1 was located.

Witness#1 stated he was visiting a relative in the area. He did not witness the stabbing but saw a black male with brown curly hair in the yard near the victim. He stated the black male approached him with his hand behind his back. He and another unidentified male yelled to leave at which time he ran off.

A few minutes after arriving on that scene, Officers heard over their police radios of an assault nearby in the area of 41st and Osage possibly involving the same black male. Shortly after hearing that call, the officers indicate that they heard several gunshots coming from that area. They then heard a shooting call come out over their radios.

At approximately 1815 hours, other Officers were dispatched to the area of 41st and S. Osage regarding the assault where a black male had attacked a female (Victim#2) and her two small children, ages 3 and 5 years old (Victim#3 and #4). That call was upgraded to a shooting with two subjects shot (Victim#5 and #6)

Upon arrival on that scene Officers located Victim#5 lying on the ground between two houses suffering from an apparent gunshot wound to the head and having no signs of life. They then turned their attention to Victim#6 who was also lying on the ground at the same location and suffering from a gunshot wound to the chest. They rendered aid to him until arrival of paramedics. Paramedics declared Victim#5 deceased. Victim#6 was transported to a local hospital and underwent surgery. At this time Victim#6 is still unconscious and unable to make a statement.

Officers contacted Victim#2 who stated she was with her children ages 3 and 5 years old, Victim#3 and #4, outside in the backyard when a black male approached from the west and jumped over her fence. He approached her and her children as she attempted to get her children inside her home. The black male grabbed the 3-year-old child around the neck with his arm and entered the enclosed patio area of her home while holding the child around the neck with his arm and lifting the child off the ground. The black male told them to shut up or he would kill them. She called her husband (Victim#5) telling him what was happening. The black male then grabbed her by the throat and took her phone but then gave it back. The black male then grabbed her 5-year-old child and held him as he did the other child. She was able to wrestle her child from the male and he walked to front of the residence. She asked a neighbor (Witness#2) to record the black male as he walked south away from her residence. Her husband arrived on scene in his vehicle and dropped off a family member. He left in his vehicle to look for the black male. He located the black male and confronted him with his handgun. During the confrontation she told her husband that the police were on the way and to not shoot the suspect. Shortly after that she heard gunshots. The black male then got into her husband's vehicle, a 2017 white Chevrolet Impala bearing a Missouri temporary license of 06WMX8 and left the area.

Witness#2 stated she saw a black male jump the fence into her yard and approach her. She sent her dogs at him, and the black male jumped the fence into Victim#2's yard. She saw the black male assault the children and started recording the male after that altercation. She stated the black male had curly dyed blond hair.

Detective Gentile later contacted Victim#1 at the hospital after surgery. He told Detective Gentile that he was at home when a black male approached asking for a ride to Target. He agreed and while taking him in the direction of Target the black male began threatening him if he did not take him where he wanted to go. The black male had changed the location in which he wanted to be taken to, so Victim#1 got on the Interstate and headed west. He stated the black male located a knife which was in the center console of his vehicle and told him he did not want to have to hurt him but would if he did not take him where he wanted to go. While on the Interstate he pulled over and tried to take his keys from his vehicle before getting out and that is when the black male stabbed him. After being stabbed he ran towards some houses where some

people were outside while the black male chased him. He ran off after being confronted by those people.

At approximately 1858 hours information was received from Kanas City, Missouri Police that Victim#5's vehicle was involved in an accident at 17th and Jackson in their city. Witnesses on scene told the officers that a black male matching the description of the stabbing and shooting suspect from Independence attempted to carjack another vehicle after the crash.

At approximately 0130 hours information was received from North Kansas City Hospital that a black male matching the stabbing and shooting suspect from Independence was brought in by Kansas City Missouri Police. The Kansas City officers had contacted the black male on an unrelated call for service in their city. He was identified as the defendant.

The defendant shows to have a criminal history of arrests or arrests with convictions for robbery 1st, burglary 1st, theft, property damage 2nd, receiving stolen property, unlawful possession of a firearm, tampering with a motor vehicle 1st, forgery, aggravated assault on a Law Enforcement Officer, interfering and fleeing. The defendant does show to be a convicted felon. He also shows to currently have several outstanding felony warrants.

T. Burchfield 1470

/S/ T. Burchfield 1470


Print Name

Signature

THE COURT FINDS PROBABLE CAUSE:

30-Sep-2023 14:07

Date

A handwritten signature in black ink, appearing to read "Janette Aoder". The signature is written in a cursive style with a large initial 'J' and a long horizontal stroke at the end.

Judge