

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	KC23077728
PROSECUTOR NO. :	095476751
OCN:	HU017033

STATE OF MISSOURI,	)	
	)	
PLAINTIFF,	)	
vs.	)	
	)	
TYHEEM V ANDERSON	)	
3304 E 75th St	)	CASE NO. 2316-CR
Kansas City, MO 64132	)	DIVISION
DOB: [REDACTED]	)	
Race/Sex: B/M	)	
S.S.N.: [REDACTED]	)	
DEFENDANT.	)	

COMPLAINT
WARRANT REQUESTED

Count I. 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 November 12, 2023, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to CONFIDENTIAL VICTIM by shooting and cutting CONFIDENTIAL VICTIM, and in the course thereof defendant inflicted serious physical injury on CONFIDENTIAL VICTIM.

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 November 12, 2023, in the County of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count 1, 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 III. Kidnapping - Facilitating A Felony - Inflicting Injury - Terrorizing - 1st Degree (565.110-002Y20201005.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.110, RSMo, committed the class B felony of kidnapping in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about November 12, 2023, defendant unlawfully confined CONFIDENTIAL VICTIM for a substantial period, without CONFIDENTIAL VICTIM'S consent by the threat of force, for the purpose of inflicting physical injury on or terrorizing CONFIDENTIAL VICTIM.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

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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 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)
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WITNESSES:

The State's witnesses as of 11/15/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 11-15-2023

CRN: KC23077728

I, Detective Jonathan Cook #5572, 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 11-12-2023, at [REDACTED] in
(Date) (Address)

Kansas City, Jackson Missouri Tyheem Anderson
(County) (Name of Offender(s))

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

The facts supporting this belief are as follows:

On 11-11-2023 at 1635 hours, Officers of the Kansas City Missouri Police Department were dispatched to [REDACTED]
[REDACTED] on a reported disturbance.

Upon arrival, Officers contacted the calling party (witness #1) who advised the victim, later determined to be [REDACTED]
[REDACTED], had been sneaking out of the house to see her boyfriend, identified as Tyheem ANDERSON
[REDACTED]. The calling party told officers that earlier in the day, a friend of the victim (witness #2), had reached out
to the calling party and advised she had been on FaceTime with the victim and saw her sitting on a couch with her hands
in the air, in what was described as a surrender position. Witness #2 advised the calling party that she could hear a male's
voice say, "What? You scared of me?" Witness #2 then heard the sounds of a struggle and the call dropped. Witness #2
checked the victim's location which indicated she was at [REDACTED].
Upon learning this information from Witness #2, the calling party immediately went to that address and called Police.

Officers attempted to make contact at [REDACTED], by knocking on the door for several minutes and checking
around the outside of the residence. No one answered the door and officers did not hear or see any signs of a disturbance.
While on scene with officers, the calling party began messaging the victim's Instagram account. The victim replied, saying
she was at work. Officers contacted the victim's employer who advised the victim was not at work and had called in prior
to the start of her shift. A Missing Persons report was taken on [REDACTED] by Officers of the Kansas City Missouri Police
Department.

On 11-12-2023, at 1215 hours, the calling party received a text from [REDACTED], advising the victim could be found at
an address in [REDACTED]. The calling party then received a call from the same phone number at 1219 hours and it was
the victim on the other end of the line. The calling party said the victim sounded lethargic or under the influence. The
calling party drove to the address in [REDACTED], however, it was determined to be a vacant residence. Later in the afternoon
of 11-12-2023, the calling party received a phone call from [REDACTED] who advised the victim could be
found at [REDACTED]. The calling party drove to that address, but again, did not locate the victim. Upon arriving
back to her residence, the calling party observed Officers of the Grandview Missouri Police Department [REDACTED]
where she later learned the officers had been dispatched on the reported deceased victim.

PROBABLE CAUSE STATEMENT FORM

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Detectives of the Grandview Police Department described the victim as having trauma to her body to include what appeared to be stab wounds, a gunshot wound, bruises, cuts, abrasions and broken teeth, however, a preliminary autopsy report was not available at this time.

On 11/13/2023, Grandview Detectives obtained a search warrant for [REDACTED] [REDACTED] [REDACTED]. At approximately 1905 hours, members of the Kansas City Missouri Police Department Tactical Unit served the search warrant on the residence. No one was located inside the residence. While Tactical Officers were clearing the residence, they observed what appeared to be blood in several locations of the residence, a knife on the couch and a spent shell casing in the bedroom.

Due to the aforementioned information received from Tactical Officers, members of the Kansas City Missouri Homicide Unit along with members of the Kansas City Police Crime Scene Section responded to process the scene at [REDACTED] [REDACTED] with Detectives of the Grandview Police Department. Utilizing luminol, a large presence of blood was indicated throughout the residence to include areas on the wall, kitchen floor, a laundry room and hallway. A spent .45 caliber shell casing as well as what appeared to be a human tooth was located in the laundry room. Paperwork and mail in the name of "Tyheem Anderson" with a date of birth of [REDACTED] and addressed to [REDACTED] [REDACTED] was also located inside the residence.

Witness #3 advised ANDERSON text from his phone number [REDACTED] asking for help from witness #3 and that the victim was dead.

On 11-14-2023, ANDERSON was taken into custody without incident and placed on a 24 hour investigation arrest. ANDERSON provided the following statement: ANDERSON provided his telephone number as [REDACTED] and his home address as [REDACTED]. ANDERSON stated he has been in a three-year long relationship with the victim. On Sunday evening, (11-12-2023), ANDERSON and the victim were at his house when an argument began regarding things ANDERSON saw on the victim's phone. ANDERSON confronted the victim about what he had observed, and threw the victim's cell phone, causing it to break. Due to the arguments between ANDERSON and the victim [REDACTED] ANDERSON ordered an Uber to pick the victim up from his house and transport her back to her residence. ANDERSON stated this was his last contact with the victim. ANDERSON received a phone call from family member the following day telling ANDERSON the victim was deceased. ANDERSON stated the argument with the victim did not become physically violent at any point. ANDERSON denied killing the victim.

Printed Name Detective Jonathan Cook #5572 Signature /s/ Detective Cook #5572

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

Judge

Circuit Court of _____ County, State of Missouri.