

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

POLICE NO. :	KC24017493
PROSECUTOR NO. :	095478351
OCN:	

FILED
DIVISION 30
23-Mar-2024 19:03
CIRCUIT COURT OF JACKSON COUNTY, MO
BY <u>Lauren D. Barnett</u> DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

TYRON LEE SIMS

3724 BROADWAY BLVD, Apt. 1004

KANSAS CITY, MO 64111

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2416-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200911.0)

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 20, 2024, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Confidential Victim, caused the death of Confidential Victim 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.

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 March 20, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the Second Degree, as charged in Count 1, 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.

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/ Caitlin Brock

Caitlin Brock (#67964)
Assistant Prosecuting Attorney
415 East 12th Street
11th Floor
Kansas City, MO 64106
(816) 881-3571

State vs. TYRON LEE SIMS, Case No.

cbrock@jacksongov.org

WITNESSES:

The State's witnesses as of 3/23/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 03-23-2024

FILED CRN: <u>KC24017493</u> DIVISION 30 23-Mar-2024 19:02 CIRCUIT COURT OF JACKSON COUNTY, MO BY <u>Laurie D. Banett</u> DCA

I, Det. Jacob Shroyer #5509, 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 03-20-2024, at [REDACTED] in
(Date) (Address)

Kansas City, Jackson Missouri Sims, Tyron
(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 03-20-2024 at 0501 hours, Officers with the Kansas City Missouri Police Department were dispatched to [REDACTED], an intersection in Jackson County, Missouri, in regard to a reported sound-of-shots call. While en-route, the call was updated to a shooting.

Upon arrival, officers determined a shooting had occurred. EMS was already on scene and the victim, later determined to be [REDACTED], was declared deceased at 0524 hours.

Spencer was found to have been shot two times. Once in the buttocks, with an exit wound to the left of his groin, and a second gunshot wound to his left arm pit.

Surveillance video from a neighboring residence shows [REDACTED] initially walking northbound on [REDACTED] to the sidewalk adjacent [REDACTED]. A short time after [REDACTED] comes into frame, an unknown male (hereinafter, suspect) is seen beginning to chase [REDACTED] is then seen falling to the ground in front of [REDACTED] falls to the ground, the suspect is seen approaching the victim and pausing before he continues running northbound. The suspect is wearing a black hat, black hooded sweatshirt, black pants, and what appears to be a ring on his pinkie finger.

Surveillance video from [REDACTED] Street was obtained. This video does not capture video of the shooting, but does capture the audio of two gunshots at 04:59:20, followed by a third at 04:59:26 hours. This is consistent with what is seen in the [REDACTED] of the shooting as the suspect appears to pause after shooting the victim, before running northbound.

Surveillance video from a camera located at [REDACTED] captures the suspect's movements after he flees the crime scene [REDACTED]. The suspect continues walking [REDACTED] on the north side of the street at 04:59:48 hours. The suspect is seen entering the McDonald's parking lot and walking northbound on Broadway Blvd.

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Another group of cameras at [REDACTED] shows the suspect continuing northbound on [REDACTED]. The suspect then enters the [REDACTED] through the front door.

Surveillance video from the [REDACTED] front door shows the suspect approach the front door and dial [REDACTED] confirmed that the dialed number on the call box would correspond to an apartment inside the building, in this case apartment number [REDACTED]. The suspect is then buzzed in and enters the building. In addition to the suspect's clothing and pinkie ring, the [REDACTED] building video shows that the suspect has tattoos on the back of both hands.

According to the [REDACTED].

On 03-21-2024, a pedestrian check was conducted of [REDACTED] identified himself and confirmed he resided at [REDACTED] was observed to have rings on both his pinky fingers consistent with the video of the suspect from the morning of the homicide.

On 03-22-2024, a search warrant for [REDACTED] City, Jackson County, Missouri was applied for and granted by [REDACTED]. Upon execution, two Winchester shotgun shells were recovered in the bedroom closet in a red backpack containing medication bottles with Tyron Sims' name on the bottles. A box of Herter's 20 Gauge slugs was found on top of the cabinet in the kitchen. A .223 cartridge (live round) was located in a drawer in the kitchen. The drawer also contained mail with Sims name on it. A black hat was located in the counter in the bathroom, black pants were found folded on the floor in the kitchen, and the gold and black Nike Airmax shoes matching those worn by the suspect were found next to the bed in the bedroom. A black hooded sweatshirt similar in appearance to the one worn by the suspect was also recovered; however, upon independent review, the hooded sweatshirt was excluded due to discernible differences. A small pistol case with an American Flag design was found on the window ledge in the bedroom next to the bag. The pistol case was empty with the exception of gun oil. An empty box for a Springfield XD .40 caliber pistol was located in the bedroom closet.

Additionally, at the time of his arrest, Sims was found to be wearing a ring on each pinky, a watch on each wrist and a bracelet on his left wrist. Sims was transported to Metro Patrol Division for booking and was initially booked on charges of FIP.

On 03-23-2024, detectives responded to Metro Patrol Division in order to interview Sims. Upon being advised of his Constitutional Rights, by reading from the Miranda Warning and Waiver card, Sims indicated he understood his rights and willing to speak with detectives.

Sims denied having shot [REDACTED] or having a reason to shoot [REDACTED] But would go on to explain that [REDACTED] had stolen from him specifically and raped associates of his. Sims further denied having left his apartment on the night [REDACTED] was killed before later recanting and stating he had left earlier in the night.

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Sims admitted to being in possession of live ammunition while knowingly being a prohibited person. During the interview, Sims was confronted with the evidence seized from his apartment. Sims dismissed the black hooded sweatshirt and black sweatpants, claiming he does not own either, despite them being recovered from his apartment. He did however specifically identify owning a pair of black and gold Nike Airmax shoes without knowledge of the description of the shoes worn by the suspect, nor the shoes recovered by police in the investigation.

During the interview Sims contested the statement made by the case detective that the [REDACTED], to gain entrance to the apartment, stating his code was "[REDACTED]". Upon further review of the [REDACTED] surveillance video, the suspect only presses the zero one time indicating Sims was right, the suspect dialed his apartment key code [REDACTED].

Printed Name Det. Jacob Shroyer #5509 Signature /s/ Det. Jacob Shroyer #5509

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

Judge

Circuit Court of _____ County, State of Missouri.