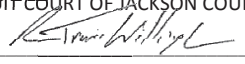


24-Jun-2024 10:25

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

CIRCUIT COURT OF JACKSON COUNTY, MO
BY  DCA

POLICE NO. :	KC24028708
PROSECUTOR NO. :	095479373
OCN:	

STATE OF MISSOURI,)
PLAINTIFF,)

vs.)

VINCENT J SCARCELLO)

10413 E 69TH TER)

RAYTOWN, MO 64133)

DOB: [REDACTED])

Race/Sex: W/M)

S.S.N.: [REDACTED])

DEFENDANT.)

CASE NO. 2416-CR
DIVISION

COMPLAINT
WARRANT REQUESTED

**Count I. Murder 2nd Degree - Felony Murder - During Perpetration/Attempted
Perpetration/Flight From Perpetration Of A Felony, A Person Dies (565.021-
003Y20200999.0)**

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 May 3, 2024, in the County of Jackson, State of Missouri, CONFIDENTIAL VICTIM was killed by a fentanyl overdose as a result of the perpetration of the class C felony of Delivery of a Controlled Substance under Section 579.020, RSMo, committed by the defendant on or about May 3, 2024, in the County of Jackson, State of Missouri.

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. Deliver Controlled Substance Except 35 Grams or Less of Marijuana or Synthetic Cannabinoid (579.020-004Y20223599.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Section(s) 558.002 and 558.011, RSMo, in that on or about May 3, 2024, in the County of Jackson, State of Missouri, the defendant knowingly distributed fentanyl, a controlled substance, to Shelby Adrian, knowing that it was a controlled substance.

The range of punishment for a class C felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years and not to exceed ten (10) years; 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/ Kristiane N. Bryant
Kristiane N. Bryant (#69524)
Assistant Prosecuting Attorney
415 E. 12th St.
Floor 7M
Kansas City, MO 64106
(816) 881-3597
KNBryant@jacksongov.org

WITNESSES:

The State's witnesses as of 6/24/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: 06/20/2024

FILED	
DIVISION 26	
CRN: <u>KC24028708</u>	24-Jun-2024 10:23
CIRCUIT COURT OF JACKSON COUNTY, MO	
BY <u>[Signature]</u>	DCA

I, Detective Alyssa Stuedle #5807, KCPD

(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 05/04/2024, at 5325 Park Ave. in
(Date) (Address)

Kansas City, Jackson County Missouri Vincent Scarcello
(County) (Name of Offender(s))

W/M committed one or more criminal offense(s).
(Description of Identity)

Felony Murder
Distribution of Controlled Substance
Possession of Controlled Substance

The facts supporting this belief are as follows:

On 05/03/2024, Kansas City Missouri Police Department Officers were dispatched to a residence in the area of 53rd Street and Park Avenue, Kansas City, Jackson County, Missouri in regard to a check the welfare. Upon arrival, officers contacted Medic 35 of the Kansas City Missouri Fire Department, who confirmed the victim as deceased on 05/03/2024 at 2357 hours.

Witness#1 stated when he arrived home from work on 05/03/2024, at approximately 2320 hours, he discovered the victim to be on the bed, unresponsive. Witness#1 called 911. Witness#1 signed a consent to search for his residence.

Detectives responded to the scene to initiate an investigation. Inside the residence a cell phone, one white pill, on the floor; three blue pills stamped with M30, an EBT card with blue residue on it, and a piece of a cut straw, on the kitchen island; a kitchen knife, with another piece of cut straw on the kitchen counter; and a deceased white female (the victim) on the bed in the bedroom with a half opened case of Narcan next to her.

The Jackson County Medical Examiner's Office took custody of the victim's body, and an autopsy was performed. The cause of death was found to be Fentanyl, Fluorofentanyl, and Ethanol intoxication.

Testing of the white and blue pills was completed, and both were positive for the presence of fentanyl.

During the course of the investigation, it was determined that the victim had been in communication with "Vince Scarcello" on 05/03/2024 at which time they made an agreement for him to deliver 6 "blues" for \$65 to her residence. "Blues" are a common reference to blue M-30 pills containing fentanyl.

Detective Stuedle conducted a computer check of Vince Scarcello, which revealed Vincent Scarcello, who

PROBABLE CAUSE STATEMENT FORM

CRN KC24028708

was listed in a prior Kansas City Missouri Police Department report with the victim. At the time of the prior report, the victim listed Vincent Scarcello as one of her sources of fentanyl.

During the course of the investigation, it was determined that Vincent Scarcello is the registered owner of a dark grey 2015 Chevy Sedan with Missouri License Plate. The vehicle has white decal writing of "CHEVY" in the front windshield.

On 05/07/2024, surveillance video of the residence where the victim was found deceased was reviewed. The video revealed on 05/03/2024 at 1651 hours, the victim walked from the front porch to a black sedan, with white writing at the top of the windshield, that had just arrived. The victim is captured getting in the vehicle on the passenger side and then the video stops. (It is doorbell video that only records when there is movement.) Vincent Scarcello's dark grey 2015 Chevy matches the description of the vehicle from the surveillance footage. The vehicle in the surveillance footage has white decal writing at the top of the front windshield. At approximately 1657 hours, the victim is captured coming back inside the residence, alone. The victim sets down what she had in her left hand lightly, on the kitchen island where the three blue m30 pills were recovered. The victim appears to then crush a pill. The victim cuts a straw and uses it to snort a substance off the countertop. The victim walks away from the counter, to the bathroom where she yells. The victim then walks into the bedroom at 1703 hours, and she is not again captured by video.

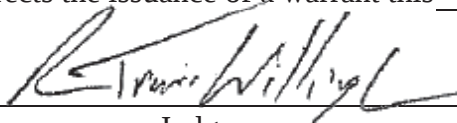
Location data for Vincent Scarcello's phone was obtained as part of the investigation and the records show the phone in the area of the victim's residence on 05/03/2024, first pinging at 1648 hours, and last pinging at 1651 hours.

Surveillance of Scarcello's residence has been ongoing and it appears that he is completing multiple hand to hand drug transactions each day with cars that come to the residence.

It is recommended a warrant is issued and a bond associated with that warrant is set due to the following:

Printed Name Detective Alyssa Stuedle #5807 Signature _____

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



Judge

Circuit Court of _____ County, State of Missouri.