

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

POLICE NO. :	24-048681
PROSECUTOR NO. :	095480067
OCN:	QO015186

FILED DIVISION 25 30-Jul-2024 21:10 CIRCUIT COURT OF JACKSON COUNTY, MO BY <u> </u> DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

MOSES LEE BASS

728 N. Jennings Road, Apt. 805

Independence, MO 64056

DOB: [REDACTED]

Race/Sex: B/M

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2416-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

**Count I. Endangering The Welfare Of A Child - 1st Degree - Death Of Child - No
Sexual Conduct (568.045-017Y20203899.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class A felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011, 558.002 and 558.011, RSMo, in that on or about July 29, 2024, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED] a child less than seventeen years of age, by failing to supervise [REDACTED] while [REDACTED] was in a room in an eighth floor apartment which contained a window with a damaged screen that was able to be opened and was accessible to [REDACTED] and this offense resulted in death to the child.

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.

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.

State vs. Moses Lee Bass, Case No.

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/ Devon Tarantino

Devon Tarantino (#72156)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4618
dtarantino@jacksongov.org

WITNESSES:

The State's witnesses as of 7/30/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT

FILED
DIVISION 25
30-Jul-2024 21:05
CIRCUIT COURT OF JACKSON COUNTY, MO
BY  DCA

Date: 07/30/2024

Report #: 2024-48681

I, Kurt Jarnagin, 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 07/29/2024 at approximately 1006 hours, Defendant Moses Lee Bass [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 07/29/2024 at approximately 1006 hours, officers responded [REDACTED] Independence, Jackson County, Missouri regarding a juvenile medical call for service.

While enroute, police dispatch advised that the calling party reported that an infant appeared to have fallen from above her apartment, on the fourth, floor to the ground below.

When officers arrived on scene, Independence Fire Department (IFD) was conducting life saving measures on Victim 1. Victim1 was located on the ground at the southwest corner of the building. Victim 1 was naked, with a diaper next to him on the ground. There were children's toys on the ground near Victim 1.

Officers contacted the father of the child, identified as Defendant Bass. Defendant Bass confirmed that he was the father of the child, who he identified as Victim 1. Defendant Bass reported that he had left his other three children with his girlfriend, I1, in their apartment on one of the upper floors.

Defendant Bass stated he walked downstairs to take the dog out at approximately 1000 hours. Defendant Bass stated he was talking to the building manager when he noticed AMR and fire arrive outside the building. Defendant Bass called Involved 1 (I1) at approximately 1012 hours to have her check on the other children, after seeing a child being evaluated by IFD.

Officers contacted I1, who stated she was in the master bedroom, which is in the southwest corner of the apartment. I1 stated the children were last checked on at 2300 hours on 07/28. At that time, the window was closed and secured. I1 stated the children were all supposed to be asleep until the parents came out of the master bedroom every morning. I1 stated she had just woken up at approximately 1000 hours and did not hear any noises coming from the bedroom next door. I1 stated she knew the window in the

children's room had a rip in the screen, as well as not being able to properly lock. I1 stated she and Defendant Bass usually secure the window with a blue pole that was supposed to be in the windowsill at the time.

I1 reported that when she checked on the children after receiving Defendant Bass' call, she walked into the bedroom and noticed the window open and unsecured, and Victim 1 was missing.

I1 reported that she has attempted several times to get building management to fix the window and stated the window has been in that condition since they moved in approximately 1 year ago in June of 2023.

Officers checked the children's bedroom and did not see the blue pole that I1 described anywhere in the bedroom. While checking the bedroom, officers noticed that the window was closed. I1 stated she closed the window the best that she could. Officers asked I1 how the window had opened, which she responded by saying Victim 3 admitted to opening it while the children were unattended.

The residence had trash piled up everywhere, specifically in the kitchen, which had huge piles of trash built up in a shopping cart. All the beds in the children's rooms were covered in old dirt and did not have any sheets on them. Old, used diapers were also found in the children's room with no receptacle to hold them. The children's room specifically smelled of urine. There was a child safety doorknob cover on the doorknob on the inside of the room the children sleep in. There were similar doorknob covers on the inside doorknob to the main door and the outside doorknob leading into the bathroom.

Victim 1 was taken to Children's Mercy Hospital where he was later pronounced deceased at 1246 hours. Detective's Campbell and Kitzenberger, with the Independence Police Department responded to Children's Mercy Hospital to contact the parents and interview them.

Search warrants were obtained for the residence at [REDACTED]. Detectives Jarnagin, VanHoecke, and Winans responded with Independence PD Crime Scene to process the scene.

Witness 1 (W1) reported consistently seeing toys thrown down past her window that were within the trajectory of the apartment where Victim1 fell. W1 stated she observes toys thrown down frequently from the Victims apartment window. W1 stated children have been throwing toys down in front of her apartment for approximately 8 months.

Victims 1, 2, and 3 were placed in state custody with Jackson County Children's Division.

Children's Division transported Victim 3 to Child Protection Center where he participated in a forensic interview. During the FI, Victim 3 disclosed that he was in the bedroom with Victim 1 prior to the incident and the door was closed.

Victim 3 disclosed that Victim 1 fell out the bedroom window and died.

Victim 3 stated he had marks on his arms and legs because I1 and Defendant Bass hurt him with an object they call Mr. Blacky. Victim 3 described Mr. Blacky by drawing a picture of a black whip or belt-like object. He stated his mother and father would also hurt himself and Victim 2 and with Mr. Blacky.

POI's were issued for Defendant Bass and I1.

A search warrant was obtained for a blue metal pole and for the belt or whip-like object that was described by Victim 3 in the forensic interview. Detectives, SWAT, and Crime Scene executed the search warrant at the residence.

Defendant Bass and I1 were arrested on their POI's. While arrested, Defendant Bass made a spontaneous utterance that what we were looking for was a belt that was in his shorts located in the residence. I1 added to what Defendant Bass said by telling detectives that the belt was used to "whoop the kids".

During the execution of the search warrant, detectives were able to locate and recover the black belt that Victim 3 described. A blue metal pole was not located.

On 07/30/2024, detectives obtained search warrants for the cell phones that Defendant Bass and I1 had on their persons when arrested.

Defendant Bass had a formal interview at police headquarters. In the interview, Defendant Bass stated he and I1 knew about the safety hazards of the window in the children's room. He stated they have known about them since June 2023. He stated he also knew that the children were able to bypass the locks and get out the window since December 2023.

Defendant Bass stated they put a blue metal pole in the track of the window and locked the window locks to keep the windows closed. Defendant Bass stated he knew that Victim 3 was able to remove the bar and unlock the windows because the children were throwing toys out the window. He stated neighbors and building maintenance brought it to their attention several times.

Defendant Bass stated he and I1 continued to keep the children in the room unattended for long periods of time with the usual means of securing the windows, despite knowing they would continually open the windows to throw toys out.

I1 had a formal interview at police headquarters. In the interview, I1 stated she knew about the safety hazards of the windows and still allowed the children to stay in the room for long periods of time unattended. She advised she had become complacent and overlooked it. I1 stated she was concerned from day one that one of her children would fall out the window.

Detective Kurt Jarnagin

/s/ Detective Kurt Jarnagin

Print Name

Signature

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

POLICE NO. :	24-048681
PROSECUTOR NO. :	095480068
OCN:	QO015190

FILED DIVISION 25 30-Jul-2024 21:40 CIRCUIT COURT OF JACKSON COUNTY, MO BY  DCA

STATE OF MISSOURI,

PLAINTIFF,

vs.

DESTINY LEEANN RANDLE

728 N. Jennings Rd., Apt. 805

Independence, MO 64056

DOB: [REDACTED]

Race/Sex: B/F

S.S.N.: [REDACTED]

DEFENDANT.

CASE NO. 2416-CR

DIVISION

COMPLAINT
WARRANT REQUESTED

**Count I. Endangering The Welfare Of A Child - 1st Degree - Death Of Child - No
Sexual Conduct (568.045-017Y20203899.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class A felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011, 558.002 and 558.011, RSMo, in that on or about July 29, 2024, in the County of Jackson, State of Missouri, the defendant knowingly acted in a manner that created a substantial risk to the life, body and health of [REDACTED], a child less than seventeen years of age, by failing to supervise [REDACTED] while [REDACTED] was in a room in an eighth floor apartment which contained a window with a damaged screen that was able to be opened and was accessible to [REDACTED], and this offense resulted in death to the child.

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.

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.

State vs. Destiny Leeann Randle, Case No.

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/ Devon Tarantino

Devon Tarantino (#72156)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
(816) 881-4618
dtarantino@jacksongov.org

WITNESSES:

The State's witnesses as of 7/30/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT

FILED DIVISION 25 30-Jul-2024 21:22 CIRCUIT COURT OF JACKSON COUNTY, MO BY  DCA

Date: 07-30-24

Report #: 2024-48681

I, Kurt Jarnagin, 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 07-29-24 at 1006, Destiny Leeann Randle [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 07/29/2024 at approximately 1006 hours, officers responded [REDACTED] Independence, Jackson County, Missouri regarding a juvenile medical call for service.

While enroute, police dispatch advised that the calling party reported that an infant appeared to have fallen from above her apartment, on the fourth, floor to the ground below.

When officers arrived on scene, Independence Fire Department (IFD) was conducting life saving measures on Victim 1. Victim1 was located on the ground at the southwest corner of the building. Victim 1 was naked, with a diaper next to him on the ground. There were children's toys on the ground near Victim 1.

Officers contacted the father of the child, identified as Involved 1 (I1) . I1 confirmed that he was the father of the child, who he identified as Victim 1. I1 reported that he had left his other three children with his girlfriend, Defendant Randle, in their apartment on one of the upper floors.

Defendant Bass stated he walked downstairs to take the dog out at approximately 1000 hours. I1 stated he was talking to the building manager when he noticed AMR and fire arrive outside the building.

I1 called Defendant Randle at approximately 1012 hours to have her check on the other children, after seeing a child being evaluated by IFD.

Officers contacted Defendant Randle, who stated she was in the master bedroom, which is in the southwest corner of the apartment. She stated the children were last checked on at 2300 hours on 07/28. At that time, the window was closed and secured.

Defendant Randle stated the children were all supposed to be asleep until she and I1 came out of the master bedroom every morning. Defendant Randle stated she had just

woken up at approximately 1000 hours and did not hear any noises coming from the bedroom next door. Defendant Randle stated she knew the window in the children's room had a rip in the screen, as well as not being able to properly lock. She stated she and I1 usually secure the window with a blue pole that was supposed to be in the windowsill at the time.

Defendant Randle reported that when she checked on the children after receiving I1's call, she walked into the bedroom and noticed the window open and unsecured, and Victim 1 was missing.

Defendant Randle reported that she has attempted several times to get building management to fix the window and stated the window has been in that condition since they moved in approximately 1 year ago.

Officers checked the children's bedroom and did not see the blue pole that I1 described anywhere in the bedroom. While checking the bedroom, officers noticed that the window was closed. Defendant Randle stated she closed the window the best that she could. Officers asked her how the window had opened, which she responded by saying Victim 3 admitted to opening it while the children were unattended.

The residence had trash piled up everywhere, specifically in the kitchen, which had huge piles of trash built up in a shopping cart. All the beds in the children's rooms were covered in old dirt and did not have any sheets on them. Old, used diapers were also found in the children's room with no receptacle to hold them. The children's room specifically smelled of urine. There was a child safety doorknob cover on the doorknob on the inside of the room the children sleep in. There were similar doorknob covers on the inside doorknob to the main door and the outside doorknob leading into the bathroom.

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Search warrants were obtained for the apartment at [REDACTED]. Detectives Jarnagin, VanHoecke, and Winans responded with Independence PD Crime Scene to process the scene.

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POI's were issued for Defendant Randle and I1.

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I1 and Defendant Randle were arrested on their POI's.

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I1 had a formal interview at police headquarters. In the interview, he stated he and Defendant Randle knew about the safety hazards of the window in the children's room. He stated they have known about them since June 2023. I1 stated he also knew that the children were able to bypass the locks and get out the window since December 2023.

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I1 stated he and Defendant Randle continued to keep the children in the room unattended for long periods of time with the usual means of securing the windows, despite knowing they would continually open the windows to throw toys out.

Defendant Randle had a formal interview at police headquarters. In the interview, Defendant Randle stated she knew about the safety hazards of the windows and still allowed the children to stay in the room for long periods of time unattended. She

advised she had become complacent and overlooked it. Defendant Randle stated she was concerned from day one that one of her children would fall out the window.

Detective Kurt Jarnagin

/s/ Detective Kurt Jarnagin

Print Name

Signature