

PROBABLE CAUSE STATEMENT FORM

Date: 06-02-2025

CRN: KC24078337 et. al.

I, Det. [REDACTED]
(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 10-17-2024, at 1111 Main Street in
(Date) (Address)

Kansas City, Jackson County Missouri Idonnas Gavrily
(County) (Name of Offender(s))

B/M 11-05-1999 committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

In 2024, Kansas City, Missouri detectives identified a pattern of non-residential burglaries dating back to March of 2024, believed to be the work of a network of burglary suspects. The suspects followed a consistent modus operandi: they broke windows of local small businesses, entered, and then they stole, or attempted to steal, items like cash, cash register drawers, and safes. In doing so, they concealed their identities with masks and dark clothing. As detailed further below, they often used the same or similar cars when arriving and fleeing the scene.

There are at least six suspects: four of them appear to be black males of average stature, one is a black male, short and very heavy of stature, and one is a white male of normal height but thin in stature. These suspects are responsible for at least 100 non-residential burglaries in the Kansas City, Missouri, metropolitan area.

[REDACTED]

Gavrily is on probation in case number 1816-CR03750-01. Detectives contacted Gavrily's probation officer, who gave detectives two numbers he uses to contact Gavrily, one of which is 816-286-3132 ("Gavrily's phone number"). [REDACTED]

Detectives obtained multiple search warrants for both historical phone records and active pen register/trap and trace data for the phone number [REDACTED]. During the course of the investigation, detectives conducted surveillance on Gavrily and compared his real-time movements to the location data from the device. Specifically on the dates 09-02-2024, 10-30-2024, and 04-09-2025, Gavrily was physically followed. His observed travel routes were found to closely align with the live and historical location data of the device. The movement patterns involved travel across multiple areas, which would have required the phone to connect to several different cell towers, further validating the data's reliability. The consistent correlation

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between Gavrily's physical movements and the device's location supports the conclusion that the phone number [REDACTED] is in active use by, and likely owned by, Idonnas Gavrily's.

Additionally, records show that the device associated with phone number [REDACTED] was frequently located at, or in close proximity to, Gavrily's known residences during the relevant time frame. This pattern was consistent across both addresses thought to have been his, as Gavrily's relocated at some point during the investigation period. The high frequency of the device's presence at these locations further supports the conclusion that the phone was in Gavrily's possession.

A recurring pattern was identified in which Gavrily's phone showed no activity during the exact time frames of several burglaries. In some of these instances, timing advance records were provided where the phone should have been communicating with the network, even in the absence of calls or data usage. The absence of such data suggests the device was either powered off or placed in airplane mode during these critical periods. This behavior is consistent with an attempt to avoid detection and obstruct law enforcement's ability to track the device's location, indicating a consciousness of guilt.

Three vehicles consistent with the suspect vehicles used in the burglaries can be associated with Gavrily's.

- Black Dodge Charger.
 - In the early morning hours of September 9, 2024, detectives were surveilling Ellison, when they observed a black Dodge Charger repeatedly leaving and then returning to Ellison's residence. Detectives followed the vehicle but lost sight of it near 31st and Gillham Road/ Plaza. Detectives subsequently located the black Dodge Charger in a parking lot nearby surrounded by closed businesses. As detectives were establishing a visual on the the black Dodge Charger, it fled when police were responding past the location to an unrelated call. It was later determined that a nearby business had been burglarized while the vehicle was parked at the location. Later that night, police again saw the black Dodge Charger at Ellison's residence. They followed it to a gas station. Gavrily's exited the black Dodge Charger, as verified by surveillance footage.

A search of Missouri Department of Revenue (DOR) records confirmed that Gavrily's was the registered owner of a black Dodge Charger. Observations made in person and in portions of the surveillance footage reveal that the headlights on Gavrily's Charger differ from standard OEM headlights, displaying a noticeable blue hue. Additionally, Gavrily's vehicle is equipped with black wheels, which is consistent with the black Dodge Charger seen in the burglary footage.

- On September 2, 2024, as verified by surveillance footage, a black Dodge Charger was used in several burglaries that fit the modus operandi outlined above.
- On October 9, 2024, as verified by surveillance footage, a black Dodge Charger was used in several burglaries that fit the modus operandi outlined above.
- On January 11, 2025, as verified by surveillance footage, a black Dodge Charger was in the area where a theft of a black Jeep Grand Cherokee occurred. The black Jeep Grand Cherokee had no license plate, but it had a Reed Dealership placard. As outlined further below, a black Jeep Grand Cherokee with no license plate but having a Reed Dealership

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placard would go on to be used in a burglary that fits the modus operandi outlined above. Javaune Tucker would identify Gavrilys as being one of the participants in the burglary in which the suspects arrived in a black Jeep Grand Cherokee with no license plate but having a Reed Dealership placard.

- Black Jeep Grand Cherokee
 - On January 12, 2025, at 4:38 AM, Charlie D's located at 600 E 99th Street, Kansas City, Jackson County, Missouri, was burglarized. Surveillance footage captured 4 suspects arrive in a black Jeep Grand Cherokee with no license plate but a Reed Dealership placard. They forced entry into the business by breaking out the glass door. The business advised \$300.00 was stolen from the cash register and green Community America bank bag. The business was charged \$1500.00 for the door repair, plus an additional \$500.00 due to the emergent status of the repair. [REDACTED] would go on to confess to being a participant in this burglary, and he specifically identified Gavrilys as being one of the participants in the crime.
- White Ford Maverick
 - On April 18, 2025, Holman Automotive reported a white 2025 Ford Maverick and a gray 2025 Ford F150 stolen from their secured lot at 9450 NE Parvin Road, Kansas City, Clay County, Missouri. Video surveillance showed that three suspects pried open a window to the trailer and obtained the vehicles keys. The video captures the suspects on the lot at [REDACTED] on three occurrences the morning of April 18, 2025; (1) 0119-0141 hours, (2) 0218 to 0223 hours, and (3) 0345 to 0351 hours. Occurrence 1 they prowled the lot and broke into the trailer, occurrence 2 they stole the F150, and occurrence 3 is when they stole the Maverick. Three suspects are present in all three occurrences. Gavrilys's phone shows at the location, or in close proximity during all three time frames.

Gavrilys's phone corresponds to multiple locations that the vehicles are seen on city cameras after their thefts.

Prior to the theft, the white Ford Maverick had distinct damage to the cabin roof above the rear driver's side passenger seat. This damage is later seen in surveillance from burglaries on 04-19-2025 and 04-22-2025.

- On April 19, 2025, four burglaries that fit the modus operandi outlined above, occurred in Kansas City, Jackson County, Missouri. A white Ford Maverick was seen in the area of all four crimes. The cell phone associated with Gavrilys's phone number appears to have been turned off during the burglaries, but the cell phone was located in areas where a white Ford Maverick can be seen on city cameras both before the burglaries (at 3:41 AM) and after them (5:19 AM). The distinct damage to the Maverick's roof can be seen on some of the video from this date.

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- o On April 22, 2025, four burglaries matching the previously established modus operandi occurred in Kansas City, Platte County, and Clay County, Missouri. A white Ford Maverick was observed at all four scenes. Surveillance footage from that date shows the vehicle with distinct damage to its roof, which matches the known condition of the suspect vehicle. Additionally, location data associated with the cell phone linked to Gavrilys indicates that it was present at, or in close proximity to, each of the burglary locations during the relevant timeframes.

The cell phone associated with Gavrilys's phone number was turned on and was present at or near thirteen distinct burglary crime scenes. These crimes all occurred in the early morning hours. The locations were not open to the public at the time of the crimes. The locations are not near Gavrilys's home. Surveillance video exists for each of the crimes to be charged. Gavrilys has an average build, but at least one of the participants fits his profile. Surveillance video reveals all persons present at the scene to be active participants in the burglaries.

Three of the burglaries for which charges are sought occurred on October 17, 2024.

That morning five businesses were burglarized within Kansas City, Jackson County, Missouri, spanning from the [REDACTED].

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[REDACTED]

One of the suspects in these burglaries was wearing the same clothing seen in the photo identified by Tucker in the [REDACTED] burglary: a black mask, black puffy Nike coat, black Adidas pants, and maroon-colored shoes with white soles.

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A review of cell phone records show that the device associated with Gavrily's phone number was present at, or in close proximity to, each of the burglary locations. The burglaries occurred across a wide area covered by multiple cell towers. The tower activity is consistent with the device being mobile and connecting to several different towers.

City cameras also captured the yellow Dodge Charger at all four of the scenes. This vehicle was determined to be stolen from 1829 Madison between 10-16-2024 at 2300 hours and 10-17-2024 at 1020 hours. The first burglary reported in Kansas City Missouri that day was at 0339 hours. Gavrily's phone records place his device at or near the scene of the vehicle theft on 10-17-2024 at 0111 hours. The Charger also hit a license plate reader located at MLK and Prospect (East #2) on 10-17-2024 at 0253 hours. Based on cellular data, Gavrily's device was likely in that area at that time.

[REDACTED]

Three of the burglaries for which charges are sought occurred on December 13, 2024.

On the morning of December 13, 2024, eight businesses were burglarized overnight. Seven were within Kansas City, Jackson County, Missouri, spanning from the River Market south past 89th Street. Charges are being sought for three of them.

- [REDACTED]

[REDACTED]

The suspect vehicle used in these offenses was a white Jeep Grand Cherokee that was determined to be stolen overnight on December 12, 2024, from 5011 Wyandotte. A review of cell phone records shows that the device associated with the number (816) 286-3132 (Gavrily's) was present at, or in close proximity to, each of the burglary locations. The burglaries occurred across a wide area covered by multiple cell towers. The tower activity is consistent with the device being mobile and connecting to several different towers.

Video also showed that one suspect is wearing a black puffy Nike coat consistent with the one worn by the suspect that [REDACTED] identified as Gavrily's in the [REDACTED].

Four other businesses were burglarized that morning; however, a time of occurrence could not be determined and video was not captured; [REDACTED]

[REDACTED] . An eighth

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burglary occurred in Kansas City, Kansas. Gavrilys's device also showed to be these five locations, but it could not be verified it was at the time they occurred.

While conducting a review of the on-going burglary pattern, a commercial burglary in Littleton, Colorado was discovered that could be linked to this group. A search of a subject of interest through the open source database Accurint revealed he was listed as a suspect in regard to the burglary.

On April 6, 2025, a burglary occurred at [REDACTED] the stolen vehicles, arresting three suspects. Gavrilys was not apprehended but can be tied to the incident through the Pen Register/Trap & Trace (PRTT) on his phone and historical phone records. Analysis showed that his device was at or near the burglary scene during the timeframe the suspects were present. After the burglary, Gavrilys's device traveled east on I-70, matching the route taken by the stolen vehicles and their recovery by law enforcement near Hays, Kansas. Surveillance later found Gavrilys to be driving a black Dodge Hornet, rented through PV Holding Corp (Avis/Budget). The license plate on that vehicle hit an ALPR in Kansas on the route back from Colorado matching Gavrilys's phone location.

One of the suspects arrested during the recovery of the stolen vehicles, [REDACTED] is currently incarcerated at the Ellis County Jail in Kansas. A review of his jail call records revealed he has had over 100 phone conversations with Gavrilys. These calls contained numerous coded references to "loads" (interpreted as stolen vehicles) and "popping out" (believed to refer to the act of committing burglaries). Of particular interest is a call on April 21, 2025, in which Gavrilys stated, "Did you know we're popping out again tonight," "popping out again tonight," and "he found something so they are going to push up on it tonight," further suggesting the planning or execution of additional criminal activity.

On the morning of April 22, 2025, the early morning hours just after Gavrilys told Dominic Williams they would be "popping out again," five businesses were burglarized by the same three suspects. All five incidents captured what appears to be the same suspect vehicle - the white Ford Maverick reported stolen on 04-18-2025. The distinct damage to the roof is visible in some of the surveillance footage.

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[REDACTED]

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Jackson County, Missouri was burglarized. A window on the east side of the building facing north was shattered. Inside the business, a glass countertop panel was broken and several items were scattered on the floor near the damaged area.

An analysis of Gavrilys's phone records show his device in the immediate area at the times for [REDACTED] there were no records between 0319-0345, which suggests the phone may have been turned off during that period. However, records from 0319 show the phone was in the Westport area, while a white Ford Maverick was observed traveling east through the intersection of Westport and Broadway. Later records placed the phone south of the incident location, and at 4:02 AM, a white Ford Maverick was located traveling south at 89th and Holmes, with phone records confirming its location in that area at the time.

The incidents that occurred in Platte and Clay counties were included to demonstrate a continuing pattern of criminal activity by Gavrilys. These cases will be submitted to the respective jurisdictions in which they took place.

Printed Name [REDACTED]

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

Judge

Circuit Court of _____ County, State of Missouri.