

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

Police# 16-001049
Prosecutor# 095431526
1616-CR 0146/KH
OCN#

FILED
CIRCUIT COURT
JACKSON CO., MO.-1

16 APR 19 AM 9:54

COMPLAINT

STATE OF MISSOURI

vs.

Tyler S Daleo
5215 E. 54
Kansas City, MO
DOB: 05/24/1988; Race/Sex: W/M;
SS# [REDACTED]
Defendant.

Count I. Assault 1st Degree (565.050-002Y19791305.0)

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 B felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about April 18, 2016, in the County of Jackson, State of Missouri, the defendant beat [REDACTED] and such conduct was a substantial step toward the commission of the crime of attempting to kill or cause serious physical injury to [REDACTED] and was done for the purpose of committing such assault.

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.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

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 April 18, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Assault in the First Degree charged in Count I, 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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

Count III. Burglary 1st Degree (569.160-001Y19792204.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about April 18, 2016, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in an inhabitable structure, located at 103 S. Ralston, Independence MO and possessed by [REDACTED] for the purpose of committing Assault therein, and in effecting entry there was present in such inhabitable structure [REDACTED] a person who was not a participant in the crime.

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.

Count IV. Armed Criminal Action (571.015-001Y19755299.0)

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 April 18, 2016, in the county of Jackson, State of Missouri, the defendant committed the felony of Burglary in the First Degree charged in Count 3, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Burglary in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, 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.

THE STATE OF MISSOURI

vs.

Tyler S Daleo

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,



Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, Missouri 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

CPT Matthew C. Kline , 1001 Heroes Way, Sugar Creek, MO 64054



PO Josko Wrabec , 2916 Iva Dr., Independence, MO 64057

STATEMENT OF PROBABLE CAUSE

Date: 04/19/2016

I, Detective Josko Wrabec, a sworn Peace Officer with the Sugar Creek, Missouri Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that on or about 04/18/2016, Tyler S Daleo, W/M, DOB: 05/24/88, SSN: [REDACTED] [REDACTED] 5215 E 54th St, Kansas City, Jackson County, MO, committed one or more criminal offenses in Jackson County, Missouri.

The facts supporting this belief are as follows:

On 04-18-2016, at about 1502 hours, Cpt. Kline and I were dispatched to 103 S. Ralston (Cpl. Loring received a telephone call stating there was an assault that had occurred at 103 S. Ralston). Upon arrival, I was contacted by [REDACTED] at 101 S. Ralston, who informed me the victim [REDACTED] was inside her residence.

Upon entering 101 S. Ralston, I observed the victim, sitting on the floor, leaning against a chair in the living room. [REDACTED] face was covered in blood, and he appeared to have large contusions and lacerations around his face. [REDACTED] complained of head, neck, back, and rib pain. I requested AMR Ambulance and SCFD respond to assess the victim. The victim, who had varying states of consciousness, informed me that he met a girl [REDACTED] on Saturday, 04-16-2016, "she stayed the night and stuff happened". [REDACTED] left on Sunday; [REDACTED] noted that she stated her boyfriend just got out of jail and his name was Tyler or Taylor. [REDACTED] stated sometime between 1200 and 1300 hours on today's date, [REDACTED] called and asked if she could come over for ten minutes. At some point, [REDACTED] answered the door, and stated the suspect shouldered his way in and had a gun, possibly a .380. The male suspect told [REDACTED] to get on his knees and began to hit him with the gun and shoes. [REDACTED] stated he was then hit in the head, face, neck, and ribs by the suspect. The suspect also made threats of being in a gang, and poured some type of cleaner on the victim's clothes and said he was going to set him on fire. [REDACTED] stated he changed his clothes, after being freed. While obtaining his information, it was determined there was a second subject, [REDACTED] who is the roommate of [REDACTED] who was also a victim of this incident.

In attempt to gain further information regarding the incident, I responded to Trent's residence located at 103 S Ralston Ave. and contacted the second victim [REDACTED]. [REDACTED] had no apparent injuries and gave the following statement. He advised that he had been in his room when he heard a loud noise. He responded to the front room of the residence where he observed a tall white male yielding a black firearm and giving commands. The white male had tied his roommate, Trent, up and was actively kicking him in his face and stomach. The suspect then ordered him, [REDACTED], to the ground and tied his hands behind his back like he had done to Trent. At one point [REDACTED] heard a female subject he recognized to be [REDACTED] say, "Stop!". To which the suspect stated, "No their dead!" The suspect then began pouring an unknown chemical liquid on him and Trent. [REDACTED] expressed that he was afraid the suspect was going to shoot or light him on fire. The suspect left without causing further injury and was observed by a witness leaving in a black sedan bearing Kansas license 723HUF.

Due to the nature and severity of the injury in the crime, it was determined necessary to locate the suspect as soon as possible. An inquiry of the above information revealed a subject named Tyler Daleo who is the boyfriend of [REDACTED] and was recently released from Jackson County Detention Center. It should be noted that the victim's indicated the suspect stated he had recently been released from jail. Furthermore, the victims indicated the suspect was approximately 6' 2" and 180lbs. A check of Daleo showed him to be 6' 2" 180lbs.

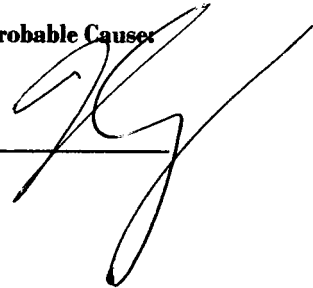
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With the above information, I conducted an exigent circumstance ping of the listed number for Daleo. The ping revealed his phone to be in Grandview, MO within 8 meters of 13622 11th Ter., which is the address of the cosigner used for bonding Daleo out of Grandview Jail the day prior, 04/17/2016. Multiple pings were conducted and continued to show Daleo's phone at the residence. To insure the integrity of the information, an officer in an unmarked vehicle was placed in an area where he could view the residence until a warrant could be obtained. While conducting surveillance the Officer observed a vehicle matching the suspect vehicle arrive at the residence. The vehicle plate matched the suspect vehicle information. Additionally a white male exited the driver seat and entered the residence.

Det. Josko Wrabec #929


Signature

The Court Finds Probable Cause


Judge