

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

Police# 15-009419  
Prosecutor# 095431981  
1616-CR  
OCN# CA006695

**COMPLAINT**

**STATE OF MISSOURI**

**vs.**

**Joshua R. Trigg  
2023 NE Patterson  
Lees Summit, MO 64086  
DOB: 1/10/2002; Race/Sex: B/M;  
SS# [REDACTED]  
Defendant.**

**Count I. Murder 1st Degree (565.020-001Y19840904.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 565.020, RSMo, in that on or about November 1, 2015, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with another, after deliberation, knowingly caused the death of Tanya L. Chamberlain by stabbing her.

**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 November 1, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Murder 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 Murder in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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. Robbery 1st Degree (569.020-001Y19791205.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, RSMo, committed the class A felony of robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about November 1, 2015, in the County of Jackson, State of Missouri, the defendant acting alone or in concert with another, forcibly stole a Toyota Camry owned by Tanya Chamberlain, and in the course thereof the defendant or another participant in the crime used a dangerous instrument against Tanya Chamberlin.

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 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 November 1, 2015, in the county of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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.

**Trevon M Henry**

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,



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Michael J. Hunt (#34818)  
Assistant Prosecuting Attorney  
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WITNESSES:

DET Chad Albin , 10 NE Tudor, Lee's Summit, MO 64086

# STATEMENT OF PROBABLE CAUSE

Lee's Summit Police Department Case File: 15-009419

Date: Friday, 10 June 2016

I, Detective C. Albin, Badge #9919, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

I have probable cause to believe that on **1 November 2016**, at the **Quick Clean** (car wash) located at **910 Northeast Langsford Road**, Lee's Summit, Jackson County, Missouri 64063, **Joshua R. Trigg** [black, male, DOB: 10 January 2002, 13 years old at the time of the incident, SSN ██████████] committed one or more criminal offenses.

The facts supporting this belief are as follows:

On 1 November 2015 at approximately 2:12 AM Officer J. Reddell attempted to conduct a vehicle stop in the five hundred block of Southeast 2nd Street, Lee's Summit, Jackson County, Missouri. The vehicle was Westbound on Southeast 2<sup>nd</sup> Street. The driver was operating the vehicle at night without the headlights on, crossed the center dotted line multiple times, and crossed the white line on the right shoulder. Officer Reddell suspected the the driver may have been too intoxicated to operate a motor vehicle. Officer Reddell activated his emergency lights signaling to the driver of the vehicle to pull over to the side of the roadway. The vehicle pulled into a parking lot at the Ashbrooke Apartments complex located on the North side of Southeast 2<sup>nd</sup> Street (the address of the office for Ashbrook Apartments was 524 Southeast 2<sup>nd</sup> Street, Lee's Summit, Missouri 64063). The vehicle pulled through a parking lot and started driving on the lawn area between two apartment buildings with Officer Reddell following in his patrol vehicle. The vehicle became stuck in wet grass and mud and was unable to continue. Once the vehicle stopped the driver of the vehicle and a passenger, that was sitting in the backseat of the vehicle, immediately exited the vehicle and started running together away from the area where the car was stopped.

Both suspects exited the vehicle and ran Northeast from the vehicle. Officer Reddell chased after both suspects. Officer Reddell chased the suspects from the vehicle stop to the area of Northeast Ash Street and Northeast Corder Street. Officer Reddell fell inside an open concrete drain and lost sight of the two suspects. When Officer Reddell returned to the suspects' vehicle he discovered a white female lying on the front passenger seat of the vehicle. Officer Reddell immediately requested additional officers and the Lee's Summit Fire Department. The Lee's Summit Fire Department informed the Officers on scene that the female inside the vehicle was in fact deceased. Without moving the female victim Officer Reddell could see lacerations on her face. He also observed a knife lying on the backseat of the vehicle. The knife was covered with apparent blood and apparent human hair.

After searching vehicle records and internal records held by the Lee's Summit Police Department the victim was identified as Tanya L. Chamberlain. The VIN attached to the vehicle confirmed that the vehicle belonged to T. Chamberlain as well.

On 3 November 2015 Detective A. Ide and Detective M. Hawkins went to the Hy-Vee located, located at 301 Northeast Rice Road, Lee's Summit, Jackson County, Missouri, to review video surveillance that may show the victim and her vehicle at the Quick Clean carwash located at 910 Northeast Langsford Road, Lee's Summit, Jackson County, Missouri. Detective Ide and Detective Hawkins discovered the following:

- A. They watched the video surveillance footage the showed the T. Chamberlain's vehicle parked at a vacuum spot at the rear of the carwash. The approximate time that the vehicle was at the carwash was 1:14 AM on 1 November 2015.
- B. At approximately 1:51 AM two people walked into the area where the T. Chamberlain's vehicle was parked. One person was wearing a pair of dark colored pants and a dark colored shirt or jacket. The second person was wearing a pair of lighter colored pants and a dark colored shirt or jacket.
- C. At approximately 1:57 AM the same two people that were mentioned above get into T. Chamberlain's vehicle along with T. Chamberlain, who sat in the driver's seat.
- D. The video surveillance continues to record the vehicle sitting in the parking lot until 1:59 AM. Then due to the time change for daylight savings time the video surveillance system stopped recording. When the video surveillance started recording again T. Chamberlain's vehicle and all three people could no longer be seen in the parking lot.

After watching the above video surveillance Detective Hawkins and Detective Ide reviewed additional video that was recorded prior to the two suspects approaching T. Chamberlain's vehicle. They observed video surveillance that showed the same

two suspects, mentioned above, enter Hy-Vee through a public entrance. While viewing the video surveillance they were able to determine that the suspects were black males and were wearing the following:

- A. Purple colored sweatshirt with "Vikings" printed on the front.
- B. Black colored hooded sweatshirt.
- C. Khaki colored pants.
- D. Dark colored pants.
- E. Black and white colored shoes with a checker pattern.

On 3 November 2015 the Lee's Summit Police Department Criminal Investigations Unit identified a source that stated she recognized the both suspects that were shown in the video surveillance release by the police department online. She recognized the suspect wearing the purple colored hooded sweatshirt and shoes with the black and white checker pattern to be Trevon Henry. She also recognized the additional juvenile shown in the video surveillance.

On 3 November 2015 the Lee's Summit Police Department Communications Unit received a phone call from a second witness who stated she had information about the two suspects in the homicide investigation. She recognized the suspect wearing the purple colored hooded sweatshirt and shoes with the black and white checker pattern to be Trevon M. Henry (suspect). She added that she also could identify the second suspect that was with Joshua R. Trigg (suspect).

On 4 November 2015 I interviewed T. Henry in the Lee's Summit Police Department Criminal Investigations Unit. T. Henry was arrested at his residence during the execution of a search warrant. Henry was transported to the Lee's Summit Police Department Detention Unit. After Trevon was transported to the Lee's Summit Police Department. I contacted the Jackson County Family Court and I was put in contact with a Deputy Juvenile Officer who later arrived at the Lee's Summit Police Department Criminal Investigations Unit to assist with an interview. The Deputy Juvenile Officer read a version of the Miranda Warning specifically authored for juveniles to T. Henry. After the hearing of the Miranda Warning T. Henry stated he did not want to answer any questions. T. Henry's mother then asked if she could speak with him inside the interview room. The Deputy Juvenile Officer and I left the interview room. T. Henry sat next to his mother on a coach that was in the room. Per department policy, all interview rooms are recorded (audio and video). The recording was still active after the Deputy Juvenile Officer and I left the room. T. Henry and his mother talked after we left the interview room. Most of the conversation could not be heard but the following summarizes some of the statements between T. Henry and his mother:

- A. T. Henry told his mother that he was with J. Trigg when T. Chamberlain was murdered.
- B. T. Henry stated that he and J. Trigg "jumped her" in order to get inside her vehicle and drove her vehicle out of the parking lot. When they were stopped by the police department he and J. Trigg both ran from the vehicle.
- C. Towards the end of their conversation T. Henry asked his mother what she did with his shirt and pants. His mother told him that she threw the items away in the trash.

On 4 November 2015 I interviewed J. Trigg in the Lee's Summit Police Department Criminal Investigation Unit. J. Trigg was arrested at his residence during the execution of a search warrant. J. Trigg was transported to the Lee's Summit Police Department Detention Unit. After J. Trigg was transported to the Lee's Summit Police Department. I contacted the Jackson County Family Court and I was put in contact with a Deputy Juvenile Officer who later arrived at the Lee's Summit Police Department Criminal Investigations Unit to assist with an interview. The Deputy Juvenile Officer read a version of the Miranda Warning specifically authored for juveniles to J. Trigg. After hearing the Miranda Warning J. Trigg agreed to speak with me and answer my questions. J. Trigg's mother and the Deputy Juvenile Officer were both present during the entire interview. During my interview, J. Trigg described in detail how T. Henry planned on stabbing T. Chamberlain in order to take her vehicle. J. Trigg then described how he witnessed T. Henry cutting T. Chamberlain's throat and then continued to stab her multiple times.

The Jackson County Medical Examiner's Office reported T. Chamberlain's cause of death to be multiple stab wounds and the manner of death to be homicide.

On 25 April 2016 I received a "Q Lab DNA Certified Report" from the "Missouri State Highway Patrol Crime Laboratory Division". The report was in reference to samples of DNA and apparent blood that had been provided to the laboratory for processing. The following statements were taken from the report:

- A. Profiles developed from the knife recovered from the back seat of the vehicle, the purple colored sweatpants, and the khaki colored pattern pants were consistent with one another and were consistent with the profile developed from T. Chamberlain.

The above mentioned khaki colored pattern pants were recovered during the execution of a search warrant from J. Trigg's residence and from inside the basement laundry room. The above mentioned purple colored sweatpants were recovered during

the execution of a search warrant from T. Henry's residence. The sweatpants were recovered from T. Henry's bedroom and were lying next to a purple colored sweatshirt with "Vikings" printed across the front.

10 June 2016

*Detective C. Albin, Badge #9919*

Date

Signature of Detective C. Albin, Badge #9919

THE COURT FINDS PROBABLE CAUSE.

Date

Judge