

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

<b>POLICE NO. :</b>	17-000666
<b>PROSECUTOR NO. :</b>	095438132

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>TIMOTHY O. YOUNCE</b>	)	
<b>930 Ewing,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64126</b>	)	<b>DIVISION</b>
<b>DOB: 02/12/1975</b>	)	
<b>Race/Sex: W/M;</b>	)	
<b>SSN: X [REDACTED]</b>	)	
	)	<b>DEFENDANT.</b>

**AMENDED COMPLAINT**

**Count I. Burglary 1st Degree (569.160-001Y19792202.0)**

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 February 27, 2017, in the county of Jackson, State of Missouri, the defendant, either acting alone or in concert with another, knowingly entered unlawfully in an inhabitable structure, located at 8 [REDACTED] Crescent, Raytown, Missouri and possessed by [REDACTED], for the purpose of committing a stealing therein, and while in such an inhabitable structure 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.

**State vs. Timothy O. Younce**

**Count II. Burglary - 2nd Degree (569.170-001Y20172202.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 27, 2017, in the county of Jackson, State of Missouri, the defendant, either acting alone or in concert with another, knowingly entered unlawfully in an inhabitable structure, located at 8[REDACTED] Ash, Raytown, Missouri and possessed [REDACTED], for the purpose of committing a stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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.

**Count III. Stealing - \$750 Or More (570.030-035Y20172308.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 27, 2017, in the County of Jackson, State of Missouri, the defendant, either acting alone or in concert with another, appropriated Dewalt cordless power tools, iphone, tools, C-clamps, air compressor, and floor jack, of a value of at least seven hundred fifty dollars, which property was in the possession of [REDACTED] and [REDACTED], and defendant appropriated such property without the consent of [REDACTED] and [REDACTED] and with the purpose to deprive [REDACTED] and [REDACTED] thereof.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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.

**State vs. Timothy O. Younce**

**Count IV. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20172999.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class D felony of tampering in the first degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 27, 2017, in the county of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated an automobile, namely a Ford F-150.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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.

**Count V. Resisting/interfering With Arrest For A Felony (575.150-001Y20174801.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the class E felony of resisting an arrest, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 27, 2017, in the county of Jackson, State of Missouri, Officer Jerrol Anderson, a law enforcement officer, was making an arrest of defendant for the felony of burglary, and the defendant knew or reasonably should have known that the officer was making an arrest, and, for the purpose of preventing the officer from effecting the arrest, resisted the arrest of defendant by fleeing from the officer.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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 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.

**State vs. Timothy O. Younce**

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/ Kelly Collins*  
Kelly Collins (#68006)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO - 64050  
(816) 881-3288  
kmcollins@jacksongov.org

**WITNESSES:**

DET Jerrol Anderson , 10000 E. 59th Street, Kansas City, MO - 64133

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

PO Dallas Burnette , Prosecuting Atty. Office, Kansas City, MO - 64106

CPL Anthony Hall , 10000 E. 59th Street, Raytown, MO - 64133

PO Joseph Holt , 10000 E. 59th Street, Raytown, MO - 64133

PO Larry Jackson , 10000 E. 59th Street, Raytown, MO - 64133

SGT Jared Rogers , 10000 E. 59th Street, Raytown, MO - 64133

[REDACTED]  
[REDACTED] - 64133  
[REDACTED]

## STATEMENT OF PROBABLE CAUSE

Date: 02-28-17

Report # 17-0666

**I, Detective Joseph W Holt, a Detective with the Raytown, Missouri Department of Police, 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 02-27-17, at 8█ Crescent Avenue, Raytown, Jackson County, Missouri, Timothy Younce, W/M 02-12-1975, SS# █, committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 02-27-17 at approximately 1545 hours, Officer Jerrol Anderson and P.O. Dallas Burnette were dispatched to 8█ Crescent on a Burglary in progress. The victim identified as █ explained that she observed green truck pull into her driveway with two men sitting in the truck. She heard a loud noise and a voice coming from within her garage. █ stated that she looked into her garage and located a white male inside her garage holding a black case. She yelled at him and he dropped the black brief case and ran outside out of view. She then saw the green truck drive south.

P.O. Anderson located the green 1997 Ford F-150 at the intersection of 79<sup>th</sup> and Street and Spring Valley conducted a traffic stop and a pursuit ensued. Corporal Anthony Hall and Sergeant Jared Rogers assisted in the pursuit. During the pursuits Sergeants Roger's speeds ranged from 59 M.P.H to 92M.P.H. The truck eventually wrecked at I-70 and Van Brunt and the two white male occupants bail from the vehicle.

Sergeant Roger's observed the driver, later identified as Timothy Younce. P.O. Anderson, Corporal Hall and Sergeant Roger's were able to take Mr. Younce into custody in the driveway of 2806 Lister. Sergeant Roger's indicated while chasing Mr. Younce he momentarily lost sight of him, but P.O. Anderson had located him. Sergeant Roger's with the assistance of the Kansas City Police Department located Scott Roberts in a vacant house at 2824 Elmwood. Sergeants Rogers indicated 2824 Elmwood was the last place he observed Mr. Robert's while he was chasing Mr. Younce.

Kansas City Officers responded to the green 1997 Ford F-150 and performed a records check of the VIN 1FTDXO760VBK30864. The VIN revealed that the vehicle had been stolen from Richmond, Missouri on 02-07-17.

P.O. Dallas Burnett responded to the address and contacted █ who arrived at 8█ Crescent a short time later. █ indicated that he was missing a blue Air Compressor valued at \$109.00 and a 2-1/2 ton floor jack valued at \$99.00.

P.O. Anderson who was at the truck at that time, indicated that he had located a blue Air Compressor and a 2-1/2 ton floor jack with the truck. P.O. Anderson indicated that he had located numerous other misc. tools and several Dewalt power tools in the bed of the

truck. P.O. Anderson requested a Police Tow so the stolen green Ford F-150 and its content could be towed to the Raytown Police Department for processing.

Corporal Hall transported Mr. Younce to Research Hospital at his request. While Corporal Hall was at Research Hospital, I was advised that he had located a measurable amount of what he believed to be methamphetamines on Mr. Younce. Corporal Hall advised that Mr. Younce admitted that he also had placed an unknown amount of unwrapped heroin inside his anal cavity.

On 02-27-17, at approximately 1655 hours, Detective Holt overheard radio traffic of another burglary that had occurred between 2:40 P.M and 4:30 P.M at 8 [REDACTED] Ash. P.O. Larry Jackson and Corporal Shawn Didde responded to the address. Detective Holt contacted P.O. Jackson by phone and asked him if the victim later identified as [REDACTED]n [REDACTED] was missing any Dewalt cordless style power tools. P.O. Jackson advised Detective Holt that Mr. [REDACTED] was missing numerous Dewalt cordless style power tools valued at approximately \$1200.00. P.O. Jackson also advised Detective Holt that Mr. [REDACTED] was also missing misc. tools valued at approximately \$950.00, and an I-phone that was in a mint green case valued at \$500.00 and a pink piggy bank.

P.O. Jackson indicated to Detective Holt that entry was made through the common backdoor to the garage. P.O. Jackson advised that the lock plate to the door had been busted and the door jamb had fresh pry marks on the door.

P.O Jackson indicated in his report that numerus other items appeared to be, Staged for the taking” within the house. P.O. Jackson indicated that numerous rooms were in disarray. P.O. Jackson was advised by Mr. [REDACTED] that one of his neighbors observed a green truck occupied by an unknown race male leaving the driveway of his residence.

On 02-27-17, at approximately 1730 hours, Detective Holt was advised that the stolen green F-150 was inside the garage of the Raytown Police Department. Detective Frank McDevitt contacted Eddie Birdson by phone. Detective McDevitt advised Mr. Birdson about the circumstances surrounding his truck. Detective McDevitt asked Mr. Birdson permission to search his truck to which he agreed to.

Detective Holt, Detective Nancy Wasko and Detective McDevitt started to search and process the 1997 Ford F-150. Inside the cab of the truck Detective Holt observed a blue air compressor in the backseat behind the driver’s seat.

In the bed of the truck, Detective Wasko and Detective Holt located a 2-1/2 ton floor jack, numerous cordless Dewalt power tools, an I-phone in a mint green case, misc. other tools and C-clamps that were engraved with the name [REDACTED]” on them. Detective Holt noticed that the Dewalt cordless power tools and other misc. tools were laying on top of the 2-1/2 ton floor jack.

Detective Holt located a clear plastic baggie containing a crystal like substance in the center cup holder section of the truck. The substance later field tested for the presence of

methamphetamines. The methamphetamines had an approximate weight of 1.4 grams. Detective Holt noticed that the ignition had been punched.

On 02-27-17, Mr. [REDACTED] arrived at the Raytown Police Department and identified the Dewalt cordless tools, piggy banks, I-phone and other misc. tools as the tools and items that were missing from his residence.

On 02-27-17, Mr. [REDACTED] arrived and identified the blue air compressor and the 2-1/2 ton floor jack as the items taken from his residence.

On 02-27-17 at approximately 2045 hours, Detective Holt and Detective Wasko interviewed Mr. Roberts. Mr. Roberts said, he was picked up by Mr. Younce in the green truck. Mr. Roberts advised that he and Mr. Younce drove by an open garage door (8525 Crescent) and took a blue air compressor and floor jack from inside the garage.

Detective Holt then asked Mr. Roberts about the burglary at 8621 Ash. Mr. Roberts indicated to Detective Holt that he knew nothing about the other house. Detective Holt continued to ask Mr. Roberts question and at approximate 2054 hours, Mr. Roberts indicated to Detective Holt he was done talking.

Detective Holt then entered the booking desk area that is located in front of the vestibule of the holding cell. Inside the vestibule Mr. Younce was standing. He looked at Detective Holt and told him to, "Fuck Off" and he wanted his lawyer. At that point Detective Holt had not attempted to make any type of conversation or communicate with Mr. Younce.

/S/ Detective Joseph Holt #1408  
Detective (printed)

\_\_\_\_\_  
Signature

**THE COURT FINDS PROBABLE CAUSE.**

\_\_\_\_\_  
DATE

\_\_\_\_\_  
JUDGE

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

<b>POLICE NO. :</b>	17-000666
<b>PROSECUTOR NO. :</b>	095438135

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>SCOTT M. ROBERTS</b>	)	
<b>110 N Topping,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Kansas City, MO - 64127</b>	)	<b>DIVISION</b>
<b>DOB: 11/24/1969</b>	)	
<b>Race/Sex: W/M;</b>	)	
<b>SSN: ██████████</b>	)	
	)	<b>DEFENDANT.</b>

**AMENDED COMPLAINT**

**Count I. Burglary 1st Degree (569.160-001Y19792202.0)**

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 February 27, 2017, in the county of Jackson, State of Missouri, defendant, either acting alone or in concert with another, knowingly entered unlawfully in an inhabitable structure, located at 8█████ Crescent, Raytown, Missouri and possessed by ██████████ for the purpose of committing a stealing therein, and while in such an inhabitable structure there was present in such inhabitable structure ██████████, 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.

**State vs. Scott M. Roberts**

**Count II. Burglary - 2nd Degree (569.170-001Y20172202.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.170, RSMo, committed the class D felony of burglary in the second degree, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 27, 2017, in the county of Jackson, State of Missouri, the defendant, either acting alone or in concert with another, knowingly entered unlawfully in an inhabitable structure, located at 8 [REDACTED] Ash, Raytown, Missouri and possessed [REDACTED], for the purpose of committing a stealing therein.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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.

**Count III. Stealing - \$750 Or More (570.030-035Y20172308.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.030, RSMo, committed the class D felony of stealing, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 27, 2017, in the County of Jackson, State of Missouri, the defendant, either acting alone or in concert with another, appropriated Dewalt cordless power tools, iphone, tools, C-clamps, air compressor, and floor jack, of a value of at least seven hundred fifty dollars, which property was in the possession of [REDACTED] and [REDACTED], and defendant appropriated such property without the consent of [REDACTED] and [REDACTED] and with the purpose to deprive [REDACTED] and [REDACTED] thereof.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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.

**State vs. Scott M. Roberts**

**Count IV. Resisting/interfering With Arrest For A Felony (575.150-001Y20174801.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the class E felony of resisting an arrest, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 27, 2017, in the county of Jackson, State of Missouri, Officer Jerrol Anderson, a law enforcement officer, was making an arrest of defendant for the felony of burglary, and the defendant knew or reasonably should have known that the officer was making an arrest, and, for the purpose of preventing the officer from effecting the arrest, resisted the arrest of defendant by fleeing from \_\_\_\_\_ the \_\_\_\_\_ officer.

The range punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; 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 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.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Kelly Collins  
Kelly Collins (#68006)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO - 64050  
(816) 881-3288  
kmcollins@jacksongov.org

**State vs. Scott M. Roberts**

**WITNESSES:**

DET Jerrol Anderson , 10000 E. 59th Street, Kansas City, MO - 64133

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

PO Dallas Burnette , Prosecuting Atty. Office, Kansas City, MO - 64106

CPL Anthony Hall , 10000 E. 59th Street, Raytown, MO - 64133

PO Joseph Holt , 10000 E. 59th Street, Raytown, MO - 64133

PO Larry Jackson , 10000 E. 59th Street, Raytown, MO - 64133

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## STATEMENT OF PROBABLE CAUSE

Date: 02-28-17

Report # 17-0666

**I, Detective Joseph W Holt, a Detective with the Raytown, Missouri Department of Police, 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 02-27-17, at 8█ Crescent Avenue, Raytown, Jackson County, Missouri, Scott Roberts, W/M, 11-24-1969, SS#4█, committed one or more criminal offenses in Jackson County, Missouri.
2. The facts supporting this belief are as follows:

On 02-27-17 at approximately 1545 hours, Officer Jerrol Anderson and P.O. Dallas Burnette were dispatched to 8█ Crescent on a Burglary in progress. The victim identified as █ explained that she observed green truck pull into her driveway with two men sitting in the truck. She heard a loud noise and a voice coming from within her garage. Ms. █ stated that she looked into her garage and located a white male inside her garage holding a black case. She yelled at him and he dropped the black brief case and ran outside out of view. She then saw the green truck drive south.

P.O. Anderson located the green 1997 Ford F-150 at the intersection of 79<sup>th</sup> and Street and Spring Valley conducted a traffic stop and a pursuit ensued. Corporal Anthony Hall and Sergeant Jared Rogers assisted in the pursuit. During the pursuits Sergeants Roger's speeds ranged from 59 M.P.H to 92M.P.H. The truck eventually wrecked at I-70 and Van Brunt and the two white male occupants bail from the vehicle.

Sergeant Roger's observed the driver, later identified as Timothy Younce. P.O. Anderson, Corporal Hall and Sergeant Roger's were able to take Mr. Younce into custody in the driveway of 2806 Lister. Sergeant Roger's indicated while chasing Mr. Younce he momentarily lost sight of him, but P.O. Anderson had located him. Sergeant Roger's with the assistance of the Kansas City Police Department located Scott Roberts in a vacant house at 2824 Elmwood. Sergeants Rogers indicated 2824 Elmwood was the last place he observed Mr. Robert's while he was chasing Mr. Younce.

Kansas City Officers responded to the green 1997 Ford F-150 and performed a records check of the VIN 1FTDXO760VBK30864. The VIN revealed that the vehicle had been stolen from Richmond, Missouri on 02-07-17.

P.O. Dallas Burnett responded to the address and contacted █ who arrived at 8█ Crescent a short time later. █ indicated that he was missing a blue Air Compressor valued at \$109.00 and a 2-1/2 ton floor jack valued at \$99.00.

P.O. Anderson who was at the truck at that time, indicated that he had located a blue Air Compressor and a 2-1/2 ton floor jack with the truck. P.O. Anderson indicated that he had located numerous other misc. tools and several Dewalt power tools in the bed of the

truck. P.O. Anderson requested a Police Tow so the stolen green Ford F-150 and its content could be towed to the Raytown Police Department for processing.

Corporal Hall transported Mr. Younce to Research Hospital at his request. While Corporal Hall was at Research Hospital, I was advised that he had located a measurable amount of what he believed to be methamphetamines on Mr. Younce. Corporal Hall advised that Mr. Younce admitted that he also had placed an unknown amount of unwrapped heroin inside his anal cavity.

On 02-27-17, at approximately 1655 hours, Detective Holt overheard radio traffic of another burglary that had occurred between 2:40 P.M and 4:30 P.M at 8 [REDACTED] Ash. P.O. Larry Jackson and Corporal Shawn Didde responded to the address. Detective Holt contacted P.O. Jackson by phone and asked him if the victim later identified as J [REDACTED] [REDACTED] was missing any Dewalt cordless style power tools. P.O. Jackson advised Detective Holt that Mr. [REDACTED] was missing numerous Dewalt cordless style power tools valued at approximately \$1200.00. P.O. Jackson also advised Detective Holt that Mr. Askew was also missing misc. tools valued at approximately \$950.00, and an I-phone that was in a mint green case valued at \$500.00 and a pink piggy bank.

P.O. Jackson indicated to Detective Holt that entry was made through the common backdoor to the garage. P.O. Jackson advised that the lock plate to the door had been busted and the door jamb had fresh pry marks on the door.

P.O Jackson indicated in his report that numerus other items appeared to be, Staged for the taking” within the house. P.O. Jackson indicated that numerous rooms were in disarray. P.O. Jackson was advised by [REDACTED] that one of his neighbors observed a green truck occupied by an unknown race male leaving the driveway of his residence.

On 02-27-17, at approximately 1730 hours, Detective Holt was advised that the stolen green F-150 was inside the garage of the Raytown Police Department. Detective Frank McDevitt contacted Eddie Birdson by phone. Detective McDevitt advised Mr. Birdson about the circumstances surrounding his truck. Detective McDevitt asked Mr. Birdson permission to search his truck to which he agreed to.

Detective Holt, Detective Nancy Wasko and Detective McDevitt started to search and process the 1997 Ford F-150. Inside the cab of the truck Detective Holt observed a blue air compressor in the backseat behind the driver’s seat.

In the bed of the truck, Detective Wasko and Detective Holt located a 2-1/2 ton floor jack, numerous cordless Dewalt power tools, an I-phone in a mint green case, misc. other tools and C-clamps that were engraved with the name “[REDACTED]” on them. Detective Holt noticed that the Dewalt cordless power tools and other misc. tools were laying on top of the 2-1/2 ton floor jack.

Detective Holt located a clear plastic baggie containing a crystal like substance in the center cup holder section of the truck. The substance later field tested for the presence of

methamphetamines. The methamphetamines had an approximate weight of 1.4 grams. Detective Holt noticed that the ignition had been punched.

On 02-27-17, Mr. █████ arrived at the Raytown Police Department and identified the Dewalt cordless tools, piggy banks, I-phone and other misc. tools as the tools and items that were missing from his residence.

On 02-27-17, Mr. █████ arrived and identified the blue air compressor and the 2-1/2 ton floor jack as the items taken from his residence.

On 02-27-17 at approximately 2045 hours, Detective Holt and Detective Wasko interviewed Mr. Roberts. Mr. Roberts said, he was picked up by Mr. Younce in the green truck. Mr. Roberts advised that he and Mr. Younce drove by an open garage door (8 █████ Crescent) and took a blue air compressor and floor jack from inside the garage.

Detective Holt then asked Mr. Roberts about the burglary at 8 █████ Ash. Mr. Roberts indicated to Detective Holt that he knew nothing about the other house. Detective Holt continued to ask Mr. Roberts question and at approximate 2054 hours, Mr. Roberts indicated to Detective Holt he was done talking.

Detective Holt then entered the booking desk area that is located in front of the vestibule of the holding cell. Inside the vestibule Mr. Younce was standing. He looked at Detective Holt and told him to, "Fuck Off" and he wanted his lawyer. At that point Detective Holt had not attempted to make any type of conversation or communicate with Mr. Younce.

/S/ Detective Joseph Holt #1408  
Detective (printed)

\_\_\_\_\_  
Signature

**THE COURT FINDS PROBABLE CAUSE.**

\_\_\_\_\_  
DATE

\_\_\_\_\_  
JUDGE