

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	17-038624
PROSECUTOR NO. :	095439807

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
TONY M. TAYLOR)	
1311 W. Short, Apt. B)	CASE NO. 1716-CR
Independence, MO - 64050)	DIVISION
DOB: 02/07/1973)	
Race/Sex: W/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, 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 June 5, 2017, in the County of Jackson, State of Missouri, the defendant forcibly stole merchandise owned by Lowe's Home Improvement, and in the course thereof defendant threatened the immediate use of a dangerous instrument against [REDACTED].

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 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 June 5, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count 1, 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

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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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

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

WITNESSES:

PO Jeffrey Buck , 223 N. Memorial Drive, Independence, MO - 64050

[Redacted signature block]

PO Tyler Duke , 223 N. Memorial Drive, Independence, MO - 64050

[Redacted signature block]

PO Kenneth Gibson , 223 N. Memorial Drive, Independence, MO - 64050

[Redacted signature block]

PO Amanda Huffman , 223 N. Memorial Drive, Independence, MO - 64050

DET Kyle Jarnagin , 223 N. Memorial Drive, Independence, MO - 64050

[Redacted signature block]

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[REDACTED]

[REDACTED]

[REDACTED]

CST Kevin Phillips , 223 N. Memorial Drive, Independence, MO - 64050

[REDACTED]

[REDACTED]

PROBABLE CAUSE STATEMENT

Date: 6/6/2017

Report #: 2017-38264

I, Kyle 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 6/5/2017, at 1815 hours, Tony M Taylor, (Race- White, Sex- Male, DOB- 02/07/1973, Address-1311 W Short Ave Apt B, Independence, Missouri, 64050, SSN- [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 06/05/2017 at approximately 1815 the Defendant, Tony M Taylor, exited Lowes (19000 E Valley View Pkwy) with \$987.59 worth of merchandise that he failed to purchase. Mr. Taylor loaded the merchandise (tools) into a shopping cart and passed every point of purchase. Mr. Taylor produced a red folding knife and pointed it at [REDACTED] when Mr. Gempeler attempted to stop him outside of the store. Mr. Taylor fled through the parking lot of Lowes (still holding the knife) and a customer attempted to block Mr. Taylor's exit. Mr. Taylor grabbed the customer (victim) around the neck, dropped the remaining piece of merchandise he was still holding and then let go continuing to run through the parking lot still in possession of the knife. Mr. Taylor attempted to enter several occupied vehicles before running towards the gas pumps at Costco (19040 E Valley View Pkwy.) Mr. Taylor attempted to enter two occupied vehicles while at the gas pumps of Costco. The driver of the first vehicle locked the doors and drove off. Mr. Taylor contacted another victim inside her vehicle (vehicle #2) at the gas pumps and pulled the victim out of her vehicle by her arm. Mr. Taylor attempted to lock the doors to the vehicle but the victim was still in possession of her keys. The victim stated she unlocked the doors and several citizens were able to physically restrain Mr. Taylor until the arrival of police. Mr. Taylor brandished the knife in an aggressive manner to several citizens who were attempting to restrain him. Mr. Taylor was taken into custody at 1828 hours. When asked about his identification Mr. Taylor provided false information. The knife was recovered and placed on property along with video surveillance from Lowes.

P.O. A Huffman/1273 was dispatched to the area of the incident where Mr. Taylor was already in custody. P.O. A Huffman spoke with [REDACTED] in reference to the incident. He stated he observed Mr. Taylor select several high dollar items and place them in a shopping cart. Mr. [REDACTED] stated Mr. Taylor exited the store without paying for the items and [REDACTED] confronted him. [REDACTED] stated Mr. Taylor produced a knife and stated "Don't think about it." [REDACTED] stated he grabbed the cart away from Mr. Taylor and Mr. Taylor grabbed one of the tool kits from the cart and fled on foot. [REDACTED] stated Mr. Taylor assaulted a customer in the parking lot who was attempting to keep Mr. Taylor from fleeing. Mr. Taylor dropped the tool kit and continued running. The customer was interviewed and confirmed he was assaulted.

P.O. A Huffman/1273 contacted a witness who stated he was in the parking lot of Lowes when the incident took place. The witness stated he observed Mr. Taylor running from the store. He

stated several other citizens were running after Mr. Taylor towards the gas pumps at Costco. The witness stated he observed Mr. Taylor inside a vehicle at the gas pumps with a knife in his hand. The witness stated Mr. Taylor finally dropped the knife and he was able to physically restrain Mr. Taylor until the police arrived.

P.O. A Huffman/1273 contacted the victim who was originally in the vehicle Mr. Taylor forced her out of. She stated she was at the gas pumps when Mr. Taylor ran up to her driver's door and began yelling "get out!" Mr. Taylor began pulling the victim out of the van by her arm. The victim stated she told Mr. Taylor she needed her oxygen tank and was able to grab it prior to being pulled out of the vehicle by her arm. The victim stated Mr. Taylor was unable to drive off because she had the key fob to her vehicle. She was able to unlock the vehicle so citizens could take control of Mr. Taylor. The victim was transported to St Lukes East by AMR and her condition is unknown at this time.

P.O. K Gibson/1147, P.O. J Buck/1471 and P.O. T Duke/1384 assisted on scene and interviewed several witnesses/victims. The witnesses interviewed all had similar statements and the victims interviewed all stated Mr. Taylor attempted to forcefully enter their vehicles while he fled on foot and/or threatened them with a knife

Detective Jarnagin

Print Name

Detective KDJ #1408

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge