

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	16-079511
PROSECUTOR NO. :	095440670

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
TYRE L. JACKSON)	
1300 Cherry St.,)	CASE NO. 1716-CR
Kansas City, MO - 64106)	DIVISION
DOB: 05/16/1982)	
Race/Sex: B/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **Class A Felony of Murder in the Second Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, and with the purpose of causing serious physical injury to Derrick Jones, caused the death of Derrick Jones by shooting him,

OR IN THE ALTERNATIVE

Count I. Murder 2nd Degree (565.021-003Y19804903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the **Class A Felony of Murder in the Second Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 22, 2016, in the County of Jackson, State of Missouri, Derrick Jones was killed by being shot as a result of the attempted perpetration of the class A felony of Robbery in the First Degree under Section 569.020, RSMo committed by the defendant on or about October 22, 2016, in the County of Jackson, State of Missouri.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

State vs. Tyre L. Jackson

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 571.015.2, RSMo, in that on or about October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, committed the felony of Murder in the Second Degree as charged in Count I, all allegations of which are incorporated herein by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Murder in the Second Degree, by, with, and through, the knowing use, assistance, and aid of a deadly weapon, and that, on or about June 4, 2004, in the 16th Judicial Circuit, Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count III. Robbery 1st Degree (569.020-001Y19791204.0)

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 October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with

State vs. Tyre L. Jackson

another, forcibly stole a vehicle in the possession of [REDACTED], and in the course thereof, the defendant or another participant in the crime was armed with a deadly weapon.

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 (571.015-001Y19755213.0)

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 571.015.2, RSMo, in that on or about October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, committed the felony of Robbery in the First Degree, as charged in Count III, all allegations of which are incorporated herein by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Robbery in the First Degree by, with, and through, the knowing use, assistance, and aid of a deadly weapon, and that, on or about June 4, 2004, in the 16th Judicial Circuit, Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

State vs. Tyre L. Jackson

Count V. Attempted Robbery 1st Degree (569.020-001Y19791204.1)

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 B Felony of Attempted Robbery in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, demanded money in the possession of [REDACTED], and in the course thereof the defendant or another participant in the crime was armed with a deadly weapon, and such conduct was a substantial step towards the commission of the crime of Robbery in the First Degree.

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 VI. Armed Criminal Action (571.015-001Y19755213.)

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 571.015.2, RSMo, in that on or about October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, committed the felony of Attempted Robbery in the First Degree, as charged in Count V, all allegations of which are incorporated herein by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Attempted Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon, and that, on or about June 4, 2004, in the 16th Judicial Circuit, Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition to

State vs. Tyre L. Jackson

any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon.

Count VII. Attempted Robbery 1st Degree (569.020-001Y19791204.1)

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 B felony of attempted robbery in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposely in concert with another, demanded money in the possession of [REDACTED], and in the course thereof the defendant or another participant in the crime was armed with a deadly weapon, and such conduct was a substantial step towards the commission of the crime of Robbery in the First Degree.

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 VIII. Armed Criminal Action (571.015-001Y19755213.)

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 571.015.2, RSMo, in that on or about October 22, 2016, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another, committed the felony of Attempted Robbery in the First Degree, as charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant, either acting alone or purposefully in concert with another, committed the foregoing felony of Attempted Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a deadly weapon, and that, on or about June 4, 2004, in the 16th Judicial Circuit, Jackson County, Missouri, the defendant was convicted of the offense of armed criminal action.

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 range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term

PROBABLE CAUSE STATEMENT FORM

Date: 09/07/2017

CRN: 16-079511

I, Detective Heather Leslie #5194, of the Kansas City Missouri Police Department
(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 10/22/2016, at 4001 Mill Streer in
(Date) (Address)

Kansas City, Jackson Missouri Tyre L. Jackson
(County) (Name of Offender(s))

B/M 05/16/1982 SSN: [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 10/22/2016 at approximately 2326 hours, officers of the Kansas City Missouri Police Department were dispatched to 4001 Mill St, Kansas City, Jackson County, Missouri on a reported sound of shots in the area. Upon arrival, officers located the VICTIM (Derrick Jones B/M 05-23-1991) lying on the ground in the parking lot adjacent to 4001 Mill St. suffering from an apparent gunshot wound. The victim was transported to a local hospital where he was pronounced dead.

Victim#2 (Davion White B/M 10/30/1989) was contacted and stated he was with his brother, the Victim and another friend, Victim #3 (Garry Robinson B/M 08/16/1993) and had parked behind the Sunfresh when the SUSPECT#1 (identified as Tyre L. Jackson B/M 05-16-1982) and SUSPECT#2 (identified as [REDACTED] B/M 10-25-1983) walked up and said "gimme what you got"! After they emptied their pockets onto the ground, Jackson and [REDACTED] told them to pick it up and then demanded more than what they were given. White said the VICTIM and [REDACTED] started to struggle so he tried to help his brother when [REDACTED] fired a round and it struck the ground. White took off running and heard another gunshot and saw [REDACTED] getting into his vehicle and Jackson in the driver's seat and they drove off. He ran back over to his brother to help him. White said it was the SUSPECT ([REDACTED]) with messy dreads who shot his brother. Robinson concurred with the statements and added that as he started to run away, he heard a gunshot and turned to see the black male with messy braids [REDACTED] shoot the VICTIM. Robinson also stated SUSPECT (Jackson) started chasing after him and demanded more from him before he ran again.

Witness #3 stated he was sitting in his car looking at his phone when he observed two black males walk towards the loading dock and the other black males who had been parked in the back parking lot drive over towards the loading dock. He heard a gunshot and saw the VICTIM fall to the ground and a black male in a white t-shirt try to help the VICTIM. He then observed the shooter get into the passenger seat of the white SUV and drive out of the parking lot so he followed the car and called 911. He followed the white SUV out to Mill St West to Southwest Trafficway then North to Valentine and then East to Broadway. The SUV drove through the Walgreens parking lot and then North on Broadway and then it pulled into the Salvation Army parking lot. Witness#3 did not follow into the parking lot and he then went back to the scene to be contacted by Police.

PROBABLE CAUSE STATEMENT FORM

CRN 16-079511

Surveillance video was reviewed and the two SUSPECTS (Jackson and [redacted]) were observed walking West through Westport from approximately 41st and Mill St. Jackson and [redacted] approach a red Dodge Charger near the intersection of Westport Rd and Mill St, that is later seen in the Sunfresh parking lot. Jackson and [redacted] are both holding what appears to be the same white Styrofoam cup throughout the video. Both Jackson and [redacted] walk in view of the OFFKEY Karaoke Bar and [redacted] is observed wearing a dark in color hooded jacket and jeans, with dreads under a baseball cap that was on backwards. There was a "U" on the front left upper chest area of the jacket. He also had on a dark in color pair of shoes with white soles and had a watch on his left wrist. He had a full beard and mustache. JACKSON was observed wearing a two tone hooded jacket with thick white strings and jeans. He was wearing dark in color shoes with white soles. He had a lighter complexion and a thin mustache. The video shows [redacted] and Jackson walking back to the area where the shooting occurred at the time of the shooting.

A white Styrofoam cup and straw was recovered from the scene of the homicide and it was processed. A swab of the straw revealed Jackson to have a major DNA profile and [redacted] as a minor DNA profile on the swab of the straw. The expected frequency of the major profile (Jackson) is one in 450 octillion unrelated individuals.

Jackson was arrested on 12-27-2016 and two firearms were recovered from his vehicle. The XD45 Tactical ACP found in his car was compared to the shell casings at the homicide scene and it was determined the above listed gun fired the two .45 rounds at the homicide scene.

Printed Name Det. Heather Leslie #5194 Signature Det. Heather Leslie #5194

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

Judge

Circuit Court of _____ County, State of Missouri.