

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	16-001856
PROSECUTOR NO. :	095443467

STATE OF MISSOURI,	)	
	)	PLAINTIFF,
vs.	)	
	)	
KEVIN O. HURLEY	)	
6427 College	)	CASE NO. 1816-CR
Kansas City, MO 64130	)	DIVISION
DOB: 03/19/1958	)	
Race/Sex: B/M	)	
[REDACTED]	)	
	)	DEFENDANT.

COMPLAINT

Count I. Murder 2nd Degree (565.021-001Y19840999.0)

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 between December 5, 2015 and January 8, 2016, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of Brandy K. Helbock-Castaneda by repeatedly striking her.

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.

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.

State vs. Kevin O. Hurley

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Bryan O. Covinsky

Bryan O. Covinsky (#47132)
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WITNESSES:

DET Bonita Y. Cannon, 1125 Locust, Kansas City, MO 64106

[REDACTED]

[REDACTED]

[REDACTED]

DET Heather D. Leslie, 1125 Locust, Kansas City, MO 64106

DET Joe A. Nelson, 1125 Locust, Kansas City, MO 64106

DET Nicholas A. Sola, 1125 Locust, Kansas City, MO 64106

[REDACTED]

PROBABLE CAUSE STATEMENT FORM

Date: 03-05-2018

CRN: 16-001856

I, Detective Heather Leslie #5194

(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 01/08/2016, at 49th and Brooklyn in
(Date) (Address)

Kansas City, Jackson Missouri Kevin O. Hurley SR
(County) (Name of Offender(s))

B/M 03-19-1958 SSN [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

On 12-23-2015 at approximately 1438 hours, Mary M. Helbock W/F 04-16-1982 walked into the Shoal Creek Patrol Division, Kansas City, Clay County, Missouri and reported her sister Brandy K. Castaneda W/F 11-01-1973 missing.

Helbock reported Brandy's roommate [REDACTED] W/F 07-30-1967 had dropped Brandy off at 1303 E 82nd Ter, Kansas City, Jackson County, Missouri on 12-05-2015 around 1840 hours. On 12-06-2015, [REDACTED] arrived home at 1303 E 82nd Ter and noticed Brandy was not at home and the items she had taken Brandy to purchase the day before were still on the counter unused. [REDACTED] reported that she had not had any contact with Brandy since she dropped her off on December 5th, 2015.

During the missing person investigation, it was determined Brandy's purse and cell phone was missing.

On 01-08-2016 at approximately 0831 hours, officers with the Kansas City Police Department were dispatched to 49th St and Brooklyn Ave, Kansas City, Jackson County, Missouri on a reported dead body. Upon arrival, officers observed what appeared to be a naked body inside a black trash bag. During the investigation, the body was positively identified as Brandy K. Helbock W/F 11-01-1973. Detectives were unable to locate the cell phone or the purse belonging to Brandy. The Jackson County Medical's Examiner's office determined the cause of death as Homicide by Blunt Force Trauma.

Cell phone records of the victim were received and it was determined the victim had used her phone up until 1829hrs on 12-5-2015. Her phone received phone calls and text messages from her roommate and father but did not dial out any numbers until 12-6-2015. The only OUTGOING calls from victim's phone number were 24 hours after she was seen alive. There were three OUTGOING calls on 12-06-2015 and only one call connected. The call that connected was to 816-226-2921 which belongs to [REDACTED] [REDACTED] was interviewed and stated the phone number 816-226-292 belonged to her. [REDACTED] was shown a photo of the victim and she stated she didn't know the victim or why her phone number showed up on the victim's phone records.

PROBABLE CAUSE STATEMENT FORM

CRN 16-001856

██████ lived at 8111 Campbell St Apt. 308 which is across the street from the President Garden apartments where the victim was last seen alive on 12-5-2015. When asked about the time frame around 12-5-2015, she stated her Uncle was at her house along with her fiance.

DNA samples and hair was collected from Helbock by Crime Scene Personnel.

A swab of the left ankle was entered into CODIS and a match was made to a Missouri convicted offender, Kevin Hurley BM 03-19-1958 who was serving a Life with Parole charge for Murder and was released in 2013.

Hurley was interviewed and denied knowing the Victim however stated ██████ is his niece and he always hung out with ██████ at her apartment across from President Gardens. He does not recall his whereabouts around December 2015 to January 2016. He refused consent for his buccal swab.

A search warrant for Hurley's Buccal Swab was obtained his Buccal swab was recovered and sent to the lab for further examination.

Hurley's Buccal swab standard was compared to a swab example obtained from the rope around the Victim's hips and it was a match to Hurley. An oral swab was sent to the Missouri State Highway Patrol Crime Lab and a YSTR DNA profile was developed and compared to Kevin Hurley and it was determined it was his DNA or someone in his paternal lineage.

It was determined he had a living son who had the same name and he was interviewed. A buccal swab was recovered from Kevin Hurley JR and compared to the profiles that were developed from the samples collected from Brandy Helbock and Hurley JR was excluded as a potential contributor. It was determined that Kevin Hurley JR is not a biological relative of Kevin Hurley SR.

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