

DA #:
Court Case #:
Dept:

FILED

IN THE MATTER OF AN APPLICATION
FOR AN ARREST WARRANT

18 MAY 17 PM 1:40

FOR: TYLER JERMAINE ANDERSON

CLERK OF DISTRICT COURT
RENO, NEVADA
P. Chermak

AFFIDAVIT IN SUPPORT OF
COMPLAINT AND WARRANT OF ARREST

STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)

I, JEFFERY BOYD, do hereby swear under information and belief and penalty of perjury that the assertions of this affidavit are true.

1. That your affiant is a duly authorized and acting peace officer employed by the Reno Police Department. That, while acting in that capacity, your affiant has become familiar with the criminal investigation and R/Ports compiled in Reno Police Department case number 18-9841; that further, your affiant is informed and believes and thereupon alleges the following to be a sufficient R/Presentation of facts to establish probable cause to believe that Aveyauna ANDERSON (hereafter "Defendant") has committed the crimes of ALLOW CHILD NEGLECT CAUSING SUBSTANTIAL BODILY HARM, a category B felony pursuant to NRS 208.508.2, that occurred or about May 04, 2018, in the County of Washoe, State of Nevada.

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1 2. On May 16, 2018 I was assigned as the lead detective
2 regarding a suspicious death investigation involving the remains
3 of a young child that had been located in Sacramento, CA and it
4 was believed that the death of the child occurred in Washoe
5 County, NV.

6 3. In support of your affiant's probable cause the
7 following information is offered:

8 4. On May 16th, 2018, the Reno Police Department
9 Robbery/Homicide Unit was informed by Sacramento Police
10 Department that they were investigating a suspicious death
11 involving the human remains of a child that were found in a
12 storage unit within the city of Sacramento, California. Sgt
13 WERNER and Detective T. HUNKAPILLER, of the Sacramento Police
14 Department, advised Reno Police Department detectives that their
15 department received a call for service on May 15th, 2018, at
16 approximately 2300 hours from Reporting Party (R/P) Joe GARCIA,
17 who stated that he discovered a box in his storage unit, located
18 at 1850 Glenrose Ave., Sacramento, California. R/P GARCIA
19 informed police that the box appeared to contain a plastic drum
20 with a duffel bag inside of it. Inside of the duffel bag
21 appeared to be the decomposing remains of a small child.

22 5. R/P Joe GARCIA informed Sacramento PD detectives that he
23 was contacted on Friday May 11th, 2018, by an acquaintance who
24 was later identified to be Tyler ANDERSON who asked R/P Joe
25 GARCIA if he could store some boxes in his storage unit (#1005).
26 R/P GARCIA met Tyler ANDERSON at his storage facility later that

1 evening and observed Tyler ANDERSON arriving on scene in a U-
2 Haul van. Sacramento P.D. was able to determine that Tyler
3 ANDERSON had removed three boxes from the U-Haul van and placed
4 them into storage unit, then departed from the scene the same
5 night.

6 6. On May 14th, 2018, R/P Joe GARCIA agreed to allow Tyler
7 ANDERSON to bring additional items to his storage unit, but
8 placed them into unit #1008. On May 15th, 2018, R/P GARCIA
9 believed that items in his storage unit belonging to Tyler
10 ANDERSON were suspicious and decided to check the boxes. In
11 storage unit #1005, R/P GARCIA opened a box that contained a
12 blue plastic drum. He found a duffel bag inside of the blue
13 plastic drum and discovered the remains of a small child. R/P
14 GARCIA called the police and Sacramento Police Department
15 detectives initiated an investigation.

16 7. Through Sacramento P.D.'s investigation it was
17 discovered that Tyler ANDERSON rented a U-Haul van on May 10th,
18 2018 from 3411 S. Virginia St., Reno, NV. In addition,
19 Sacramento PD detectives determined that Tyler ANDERSON and his
20 wife, later identified to be Averyauna ANDERSON, were residing
21 at 2401 Harvard Way #141, Reno, Nevada, which was confirmed
22 through ANDERSON'S cellular telephone information and the rental
23 agreement endorsed by Tyler ANDERSON from U-Haul.

24 8. Based on the circumstances of this case Reno Police
25 Department Robbery/Homicide Unit detectives were activated and
26 began assisting with the investigation. Your affiant was

1 assigned as the lead detective for the Reno portion of the
2 investigation. Through further investigation it was determined
3 that Tyler and Averyauna ANDERSON had three children, who were
4 identified to be C.A. [REDACTED] ANDERSON
5 [REDACTED] ANDERSON . It
6 should be noted that a medical examination of the deceased child
7 was conducted in Sacramento and initial assessments from the
8 coroner's office were that the human remains were possibly a
9 toddler aged female and that the body appeared to be
10 malnourished and emaciated.

11 9. Sacramento PD detectives later advised Reno PD
12 detectives that Tyler ANDERSON's cellular phone was observed to
13 be pinging on westbound Interstate I-80 towards Sacramento.
14 Detectives in Sacramento would later contact Tyler ANDERSON and
15 interview him regarding the human remains he delivered to the
16 storage unit at 1850 Glenrose Ave., Sacramento, California.
17 Based on this, Detective P. BLAS and your affiant made contact
18 with Averyauna ANDERSON at the ANDERSON'S residence (2401
19 Harvard Way #141) at approximately 1330 hours.

20 10. Averyauna was advised that we were Reno Police
21 detectives and allowed us to enter her residence to speak with
22 her. Upon entry into the residence I noted that the apartment
23 was extremely unkempt and in disarray as dirty clothing, food
24 and other various items were all over the floor throughout the
25 apartment. Additionally, a mattress with food stains was
26 located in the living room, and the kitchen area was unclean

1 with dirty kitchenware and spoiling food left out all over the
2 counters and floors. Averyauna stated she was home with her two
3 children, [REDACTED] who were observed to be in the
4 bedroom.

5 11. During the consensual contact your affiant asked
6 Averyauna how many children she had, to which she stated
7 "Three". Your affiant asked who her third child was, to which
8 she corroborated her name was "Cali". When asked where Cali was,
9 Averyauna initially stated "I don't know I have been sleeping"
10 and then followed up with "She is with Tyler's people."
11 Averyauna would not provide information on who the people were
12 or where they were located. Due to the nature of the case
13 involving a suspicious death of a child, the living conditions
14 of the residence and the presence of two other children in the
15 home, Washoe County Social Services Representatives were called
16 out and assisted with taking custody of Tyrell and Tytan
17 Anderson.

18 12. Averyauna was asked if she would be willing to talk
19 with detectives at the Reno Police Department main station, to
20 which she agreed to talk with us there. In an abundance of
21 caution and because she was being transported to the Reno Police
22 Department station, Averyauna was formally read and advised of
23 her Constitutional Rights via the Miranda Warning which she read
24 from the RPD Admonition & Waiver of rights form. Averyauna read
25 and initialed each of her Miranda Rights and signed the waiver.

26

1 13. Averyauna was then transported to the Reno Police
2 Department for a formal interview. Upon arrival Averyauna stated
3 that she was the primary parent who cared for C.A., [REDACTED]
4 [REDACTED] while her husband, Tyler, worked. Averyauna stated that
5 her relationship with Tyler was not good in recent months and
6 that she was feeling depressed about her family situation.
7 Averyauna mentioned that she was "disconnected" from C.A. and
8 the family numerous times during the preceding months. Averyauna
9 eventually corroborated that C.A. was not her biological
10 daughter and that [REDACTED] were her two children that
11 were conceived with Tyler.

12 13. During the interview Averyauna stated that Tyler
13 controlled decisions regarding C.A. and Tyler's extended family
14 would repeatedly remind her that she was not the biological
15 mother of C.A. and could not make decisions for her. Averyauna
16 stated that during the preceding months Cali was experiencing
17 health problems related to consistent loss of weight, trouble
18 digesting food, and was known to vomit on different occasions.
19 Averyauna ANDERSON stated that she believed C.A.'s weight loss
20 began from the time they moved to Reno until present date and
21 that C.A.'s weight loss was "considerable" in her own words.
22 Additionally, Averyauna stated that she did not take C.A. to the
23 hospital or seek medical attention for her health problems
24 because she believed it was not a priority because C.A. appeared
25 to get better each time and that it was expected of Tyler to
26 take "his daughter" to the hospital. When asked if C.A. ever

1 actually received medical treatment for her health problems
2 Averyauna stated she and Tyler did not take C.A. to any medical
3 center to be treated.

4 14. As the interview continued, Averyauna stated that on or
5 about May 4th, 2018 at approximately 22:00 hours she observed
6 C.A. to be immobile and unresponsive in one of the bedrooms in
7 their apartment. Averyauna stated that she believed Cali to have
8 a weak pulse and shallow breathing, and at that time, she and
9 Tyler took turns performing CPR. After an unknown amount of time
10 Tyler and Averyauna ceased CPR, and Tyler took C.A. into the
11 shower and placed her in cold water in an attempt to wake her
12 up. Once those efforts did not work, Tyler and Averyauna
13 continued to perform CPR. Averyauna estimated their total time
14 of lifesaving efforts lasted from approximately 2200 hours to
15 approximately 0100 hours. However, at no time did Tyler and
16 Averyauna make any effort to call emergency medical services to
17 treat Cali.

18 15. Upon realizing that C.A. was deceased, Tyler and
19 Averyauna changed C.A.'s clothing and placed her into a duffel
20 bag. The duffel bag was then placed into the bedroom closet
21 where C.A. remained for approximately seven days. During that
22 time frame, Averyauna ANDERSON stated that Tyler researched how
23 to dispose of a dead body on the Internet. On May 10th, 2018,
24 Tyler and Averyauna rented a U-Haul van, then placed Cali's body
25 and duffel bag into a plastic drum, which was then placed into a
26 cardboard box and sealed. On May 11th, 2018, Tyler drove the U-

1 Haul van and Averyauna followed in their vehicle to the storage
2 unit located at 1850 Glenrose Ave., Sacramento, California. At
3 that time, C.A.'s body was placed into storage unit #1005 and
4 Tyler and Averyanua returned to Reno, Nevada.

5 16. It is noteworthy to mention that Tyler and Averyauna
6 ANDERSON did not attempt to contact emergency medical services
7 or law enforcement from May 4th, 2018 to May 16th, 2018,
8 regarding the death of C.A. or her whereabouts.

9 17. A search warrant of the ANDERSON residence, located at
10 2401 Harvard Way #141, Reno, NV, resulted in locating a wire
11 animal crate in the bathroom with handcuffs attached to it. Next
12 to the animal crate was what appeared to be a girl's backpack
13 with girl's clothing inside, to include a hat with the name
14 "Cali" on it. In addition, old food was observed to be on the
15 floor of the same bathroom with the animal crate and backpack.
16 It is also noteworthy to mention that there did not appear to be
17 signs of a pet living in the residence, such as animal hair and
18 feces amongst the apartment's unkempt environment.

19 18. Additionally, a container labeled Medi-Haze which was
20 believed to contain marijuana was located in the same bedroom
21 that C.A.'s body was kept. This was consistent with Averyauna's
22 admissions during her interview, regarding her and Tyler's drug
23 use that took place in the same bedroom.

24 19. Based on all of the above information, your affiant
25 believed that Tyler and Averyauna were likely isolating C.A.
26 from any type of public contact possibly due to C.A. ailing

1 health conditions over the preceding months. This was further
2 supported when investigators conducted a canvas of the apartment
3 complex and contacted several neighbors who made statements that
4 they believed Averyauna and Tyler only had two male children
5 that resided at apartment #141. At no time did any of the
6 neighbors make statements regarding Tyler and Averyauna having a
7 female child under their care.

8 20. At the conclusion of the interview it was determined
9 that Tyler and Averyauna ANDERSON were responsible for the
10 safety and welfare of [REDACTED] and
11 allowed their child to suffer substantial unjustifiable physical
12 pain or mental suffering as a result of prolonged neglect due to
13 malnourishment and being placed into a situation where the child
14 would suffer substantial physical pain or mental suffering as
15 the result of abuse or neglect and that after her death Tyler
16 and Averyauna ANDERSON did take the body of C.A. and place it
17 into different containers and place a substance known as TSP
18 (tri-sodium phosphate) on the body, rent a U-Haul truck and

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1 transport said body to California to hide the body of C.A. in a
2 storage unit.

3 21. WHEREFORE, your affiant prays that a Warrant of arrest
4 issue for TYLER JERMAINE ANDERSON.

5 
6 JEFFREY BOYD

7 STATE OF NEVADA)
8) SS.
9 COUNTY OF WASHOE)

10 Subscribed and sworn to before me this 17th day of
11 MAY, 2018.

12 
13 NOTARY PUBLIC

