IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT INDEPENDENCE

POLIC	E NO. :	18-0010)24	
PROSECUTO	PROSECUTOR NO.:		095449815	
	OCN:			
STATE OF MISSOURI,)	
,	PLAIN	TIFF,)	
vs.)	
)	
JONATHON S. ZICARELLI)	
2225 Austin Ln.) CASE NO. 1816-CR	
Greenwood, MO 64034) DIVISION	
DOB: 04/25/1990)	
Race/Sex: W/M)	
)	
	DEFENI	DANT.		
	001.FD		5	

COMPLAINT

Count I. Domestic Assault 1st Degree - Serious Physical Injury (565.072-001Y19991399.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.072, RSMo, committed the **class A felony of domestic assault in the first degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about December 17, 2018, in the County of Jackson, State of Missouri, the defendant knowingly caused serious physical injury to by placing in water, and and defendant were family or household members in that and the defendant were persons who were resided together.

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.

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. Jonathon S. Zicarelli

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:

- 1. CPL Thomas Calhoun, 709 W. Main, Greenwood, MO 64034
- 2. LT Aaron Fordham, 709 W. Main, Greenwood, MO 64034
- 3. CHF Greg Hallgrimson, 709 W. Main, Greenwood, MO 64034

PROBABLE CAUSE STATEMENT FORM

Date: December 17, 2018

I, Corporal Thomas Calhoun, a police officer with the Greenwood Missouri Police Department, upon my oath, and under penalties of perjury, knowing the facts contained herein are true, state as follows:

- 1. I have probable cause to believe that on December 17, 2018, at approximately 1011 hours, Zicarelli, Jonathon Stephen, a white male, date of birth April 25, 1990, social security number violated one or more laws while in Jackson County Missouri.
- 2. The facts supporting this belief are as follows:

On December 17, 2018 at approximately 1011 hours, Zicarelli, Jonathon Stephen (W/M,04-25-1990) entered Greenwood Police Headquarters, located at 709 West Main Street, Greenwood MO, 64034. Jonathon appeared emotionally removed when making contact with Corporal T. Calhoun and stated he had just killed his child, later identified as IZ Jonathon stated he drowned his infant child in the pond by the soccer fields on Doc Henry Road, near a house.

Corporal T. Calhoun and Chief G. Hallgrimson responded to the described location, located at 707 Doc Henry Road and located the infant child in an icy pond, floating face up. Corporal T. Calhoun observed the child appeared lethargic, eyes wide and black with lifeless color to the skin. Corporal T. Calhoun entered the pond and retrieved the child and requested EMS. The child had mud in her eyes, grass and water in her mouth and was barely moving. Based upon information provided by Jonathon and the approximate time it took Corporal Calhoun to arrive on scene; the estimated time in the water was greater than 10 minutes.

During an interview conducted by Lt. A Fordham and Detective J. Cox with Jackson County Sheriff's Office, Jonathon stated he planned to kill his baby for over 24 hours after having, "Bad Thoughts". Jonathon stated he took the actions because he was trying to make it easier on his wife. Jonathon stated he was stressed out due to the holiday and trying to provide for the family. Jonathon confessed he drove to the pond, parked his car, walked down to the pond three separate times trying to determine if he could kill the child before placing the baby in the water and watching the child sink prior to leaving. Jonathon stated he then drove to the Greenwood Police Department to confess his actions.

The child's last known medical condition was stable but still in the Emergency Room and being treated for severe Hypothermia. I was advised the temperate at time of arrival to Children's Mercy Hospital was 87.9 degrees Fahrenheit. (Normal Body temp. 98.6F)

Date: 12-17-2018

Corporal T. Calhoun #145

Greenwood Police Department

Signature Colonia Colonia Signature