

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>POLICE NO. :</b>	23-087783
<b>PROSECUTOR NO. :</b>	095473143
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>CHADD J WILLIAMS</b>	)	
<b>3352 South Shady Bend Drive</b>	)	<b>CASE NO. 2316-CR</b>
<b>Independence, MO 64052</b>	)	<b>DIVISION</b>
<b>DOB: 12/03/2003</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200999.0)**

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 December 17, 2022, in the County of Jackson, State of Missouri, the defendant knowingly caused the death of James Smith by shooting him.

Defendant is further given notice that should the state submit murder in the second degree-felony under Section 565.021.1(2), it will be based on the death of James Smith as a result of the perpetration of the class A felony of robbery in the first degree under Section 571.023 RSMo committed by defendant,

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 II. Armed Criminal Action (571.015-001Y20205299.0)**

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,

## **State vs. Chadd J Williams**

committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about December 17, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of murder in the second degree charged in Count 1, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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.

### **Count III. Robbery - 1st Degree (570.023-001Y20201299.0)**

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 December 17, 2022, in the County of Jackson, State of Missouri, the defendant forcibly stole miscellaneous personal items in the possession of **James Smith**, and in the course thereof the defendant was armed with a deadly weapon.

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 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 IV. Armed Criminal Action (571.015-001Y20205299.0)**

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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 on or about December 17, 2022, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count 3, 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 knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive 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. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, 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.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Jeremy J. Baldwin  
Jeremy J. Baldwin (#62734)  
Assistant Prosecuting Attorney  
321 West Lexington Avenue

**State vs. Chadd J Williams**

Independence, MO 64050  
(816) 881-4592  
jbaldwin@jacksongov.org

**WITNESSES:**

1. PO Amanda Anderson, 223 N. Memorial Drive, Independence, MO 64050
2. PO Desiree Campbell, 223 N. Memorial Drive, Independence, MO 64050
3. PO Christopher Jenne, 223 N. Memorial Drive, Independence, MO 64050
4. [REDACTED] 0
5. CST Jason Myers, 223 N. Memorial Drive, Independence, MO 64050
6. [REDACTED]
7. CST Dale Perry, 223 N. Memorial Drive, Independence, MO 64050
8. CST Kelly Pope, 223 N. Memorial Drive, Independence, MO 64050
9. PO Hunter Soule, IPD,
10. DET Logan Waterworth, 223 N. Memorial Drive, Independence, MO 64050
11. [REDACTED]

## PROBABLE CAUSE STATEMENT

Date: 1/25/2023

Report #: 2023-87783

FILED  
DIVISION 30

25-Jan-2023 14:41

CIRCUIT COURT OF JACKSON COUNTY, MO

I, Amanda Anderson, 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. DCA

1. I have probable cause to believe that on 12/17/2022, at 1749 hours, Chadd J Williams, (Race- Black, Sex- Male, DOB- 12/03/2003, Address-3352 S Shady Bend Drive, Independence, MO 64052, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 12/18/22, at approximately 0333 hours, Independence Police Department (IPD) Officers were dispatched to 1035 S. Brookside reference a man down call. The calling party reported an unconscious white male inside of a black Chrysler 300 parked near the dumpsters in the back parking lot of the complex.

Upon the Officer's arrival, it was determined the white male was deceased. The Officer's observed the victim in the driver's seat of a black Chrysler 300, Missouri License Plate GG5-E6V; VIN 2C3CCAGT3DH630966. All four doors of the vehicle were open. The victim, identified as James D. Smith, was observed in the driver's seat of the vehicle laying face up with head resting on the center console. The victim was observed to have injuries to his face with swelling, bleeding, and bruising and there was blood in the victim's hair, on his face, and his hands. There was a small hole in the chest area of the victim's sweatshirt. A 9 mm luger shell casing was observed underneath the victim's left foot just outside of the vehicle. Also outside of the vehicle, three twenty (20) dollar bills were observed in front of the vehicle near the curb, that appeared to be fake.

Crime Scene Investigator and Medical Examiner's Investigator responded, and the scene was processed. The victim was found to have one gunshot wound to the chest. The victim was removed and transferred to the Medical Examiner's Office.

Investigators obtained video surveillance from the Brookside Apartments that captured the homicide. Video surveillance shows the suspect vehicle, a dark colored Nissan SUV, arrive in the apartment complex parking lot. The suspect vehicle is occupied by at least three subjects. On 12/17/2022, at approximately 1723 hours, the suspect vehicle arrives in the parking lot connected to 1035 S. Brookside Avenue, Independence, Missouri, which is on the south side of the apartment. The suspect vehicle circles around the lot and then drives through the south lot again, and two suspects exit the suspect vehicle and stand on the east side of the apartment building. The suspect vehicle then drives back to the north side of the apartment building and parks. After several minutes, the two suspects walk north along the east side of the building to the suspect vehicle and get in.

At approximately 1741 hours, two suspects exit the suspect vehicle and walk along the east side of the apartment building towards the south parking lot. At approximately 1743 hours, the victim's vehicle is observed parking in the south parking lot and the two suspects enter the victim's vehicle. A struggle is observed inside of the vehicle between the suspects and the victim. At approximately 1749 hours, the suspects flee from the victim's vehicle and enter the suspect vehicle on the north side of the apartment building before departing southbound on Brookside Avenue.

Video surveillance also showed one of the suspects to have a firearm with a flashlight and green laser light. One suspect is wearing a black/dark colored puffy coat, a black ski-mask, torn 'skinny jeans', and white tennis shoes, and the other suspect is wearing a white jacket with dark colored stripes on the shoulder and sleeves, torn 'skinny jeans', and white tennis shoes.

On 12/22/2022, at approximately 1106 hours, IPD Detective Waterworth contacted a family member of the victim who had access to the victim's SnapChat account. The family member stated he observed a series of SnapChat messages that would possibly help identify the suspect that killed the victim. The family member took pictures of the messages and sent them to IPD Detective Waterworth for review.

After reviewing the SnapChat messages, IPD Detective Waterworth noticed the SnapChat message conversation was regarding a narcotics transaction for marijuana. Through my training, experience, and knowledge of this investigation, the involved subject (I1), utilizing SnapChat account identified by user ID "big.fully25" (Subject SnapChat Account), appeared to be attempting to purchase an unknown quantity of marijuana from the victim. During the SnapChat message conversation, I1 shares his location with the victim, which identified the meeting location as "1101 S Brookside Ave., Independence, MO 64053 United States". The shared meeting location was sent at 1723 hours, which is approximately twenty minutes before the victim meets the two suspects at 1035 S. Brookside Avenue, Independence, Missouri. It should be noted that this is the exact time observed on video surveillance when the suspect vehicle arrives in the apartment complex parking lot.

On 12/22/2022, a SnapChat search warrant was obtained for the Subject Snapchat Account: big.fully25 and the data was obtained on 01/19/2023. Upon review, investigators observed telephone number 816-493-9653 was associated to big.fully25 SnapChat account. A review of historical cell tower log information obtained through legal process for the date and time of the homicide was conducted and it was noted that the phone number 816-493-9653 utilized a T-Mobile cell tower during the time of the homicide which was consistent with being in the area of the homicide. Further review of the SnapChat account revealed a "selfie" video snap of a black male with short black and brown dreadlocks that was recorded on 12/17/2022 at 1711 UTC (11:11 CST). There is also two separate occasions of SnapChat messages where big.fully25 is addressed in message conversations as 'Chad' or 'Chadd'.

On 01/23/2023, precision location data was received for the suspect cell phone (816-493-9653), which showed a location in the area of Truman High School, located at 3301 S Noland Road, Independence, Jackson County, Missouri. Truman High School Resource Officer J. Nunn was showed a photograph of the suspect from the SnapChat video and he identified the male as Chadd J. Williams. The identity was confirmed by Williams' DOR photos, as well as Truman High School photos.

On 1/23/2023, IPD Street Crimes Detectives conducted surveillance at Truman High School at the time of school release and SRO Nunn was able to maintain a visual on Williams until he was observed by IPD Detective Gena. IPD Detective Gena maintained surveillance on Williams and observed him to be picked up the Walmart Neighborhood Market lot and driven to 3352 S Shady Bend Drive, Independence, Jackson County, Missouri, at which time investigators were able to determine that the suspects cell phone was at the address.

On 1/24/2023, detectives conducted surveillance on 3352 S Shady Bend Drive, Independence, Jackson County, Missouri and observed Williams to exit the residence and responded to Truman High School, where he was observed entering the high school. At 1438 hours, Chadd Williams was taken into custody at Fast Stop, located at 13961 E 39th St, Independence, Jackson County, Missouri, for a felony stop order for Murder 2<sup>nd</sup> Degree issued by Detective Anderson regarding the ongoing investigation after departing on foot from Truman High School. A search of Williams' person incident to arrest revealed that Williams was in possession of the cellular device. The telephone number associated to the cellular device was confirmed as 816-493-9653 by calling it. Furthermore, it should be noted that on 1/23/2023 and at the time of arrest on 1/24/23, Chadd Williams is wearing a black 'puffy' coat, which resembles the same coat as the coat one of the homicide suspects was wearing during the incident based off video surveillance.

On 1/24/2023, Detectives interviewed Chadd Williams and he advised that the phone that was in his possession at the time of arrest was his personal cell phone and that he doesn't share it with anyone, other than letting someone make a phone call. Williams entered a PIN code to unlock and access the phone to obtain his cell

phone number and was verified as being 816-493-9653. During the interview, Williams states on 12/17/22 at 1800 hours, he was at his mother and grandmothers house at 31<sup>st</sup> and Prospect.

Williams was read his Miranda Warning of Rights and advised he understood his rights. Williams stated he wasn't in Independence on December 17<sup>th</sup>, 2022. He stated he had been at his residence on Shady Bend Drive earlier in the day, but then went to his mother and grandmother's house in the area of 31<sup>st</sup> and Prospect at approximately 1800 hours. Williams was unable to advise why his cell phone would have been at the scene of the homicide and he stated he didn't know anything about it. After investigators presented him with physical evidence of cell phone historical data and the SnapChat message conversations between Williams and the victim, Williams requested an attorney. Williams was escorted back to detention.

On 01/24/2023, IPD Detective Waterworth spoke with FBI Special Agent Tim Flohrscutz regarding the movements of the suspect telephone during the time of the homicide. FBI Special Agent Tim Flohrscutz noted the historical data obtained from the suspect cell phone was consistent with the suspect telephone being on scene of the homicide from 1723 hours to approximately 1751 hours on 12/17/2023. It should be noted that these times are consistent with the movements of the suspects arriving and departing from the homicide scene based off video surveillance obtained from the apartment complex. Furthermore, a review of the cell phone historical data revealed movements that were consistent and matched the suspect vehicle traveling westbound on Truman Road then southbound on Interstate 435 Highway after the homicide based off video surveillance observed from local businesses in the area.

Based off the information listed above, Williams utilized SnapChat to orchestrate a narcotics transaction with the victim. Through these interactions, a meet location was determined which ultimately led the victim to 1035 S. Brookside Avenue, Independence, Jackson County, Missouri where the victim was assaulted and robbed at gunpoint for an unknown quantity of narcotics, which resulted in the death of the victim by a single gunshot wound to the chest.

Detective Amanda Anderson

/s/ Amanda Anderson

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Print Name

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Signature