

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

POLICE NO. :	17-068045
PROSECUTOR NO. :	095442538
OCN :	HS035793

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
ROBERT J. WARREN)	
██████████)	CASE NO. 1816-CR00217-01
Kansas City, MO - 64129)	DIVISION 8
DOB: 07/27/1959)	
Race/Sex: B/M)	
██████████)	
)	DEFENDANT.

INFORMATION IN LIEU OF INDICTMENT

In the Circuit Court of Jackson County, Missouri, at Kansas City, Term, 2023. In Division Number ____ thereof, designated by the rules of said Court as Criminal Division ____.

Count I. Statutory Rape 1st Degree - Sexual Intercourse With A Person Less Than 14 Years Old (566.032-001Y199511980)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the felony of statutory rape in the first degree, punishable upon conviction under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between April 29, 2015 and April 29, 2017, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with ██████████ a child less than fourteen years old.

The range of punishment for the unclassified felony of statutory rape in the first degree – sexual intercourse with a person less than 14 years old is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than five years.

Count II. Statutory Rape - 2nd Degree (566.034-001Y201711980)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.034, RSMo, committed the class D felony of statutory rape in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about on or between April 29, 2017, and August 2, 2017, in the County of Jackson, State of Missouri, the defendant had sexual intercourse with [REDACTED]. and at that time [REDACTED] was less than seventeen years old and the defendant was twenty-one years of age or older.

The range punishment for a class D felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than one (1) year and not to exceed seven (7) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count III. Sexual Misconduct Involving A Child Under 15 - 1st Offense (566.083-002Y201736990)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.083, RSMo, committed the **Class E Felony of Sexual Misconduct Involving a Child**, punishable upon conviction under Sections 566.083, 558.011, and 558.002, RSMo, in that on or about August 2, 2017, the defendant knowingly exposed defendant's genitals to [REDACTED], a child less than fifteen years of age, and did so for the purpose of arousing the sexual desire of defendant.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count IV. Child Molestation - 4th Degree - Child Less Than 17 Yoa And Offender Greater Than 4 Years Older (566.071-001Y201736180)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.071, RSMo, committed the **Class E Felony of Child Molestation in the fourth degree**,

punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or between about April 29, 2017, and August 2, 2017, in the County of Jackson, State of Missouri, the defendant, who was more than four years older than [REDACTED], for the purpose of arousing or gratifying the sexual desire of defendant, subjected [REDACTED], who was then less than seventeen years of age, to sexual contact by touching [REDACTED]'s breasts through the clothing.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count V. Child Molestation - 4th Degree - Child Less Than 17 Yoa And Offender Greater Than 4 Years Older (566.071-001Y201736180)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.071, RSMo, committed the **Class E Felony of Child Molestation in the fourth degree**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or between April 29, 2017, and August 2, 2017, in the County of Jackson, State of Missouri, the defendant, who was more than four years older than [REDACTED], for the purpose of arousing or gratifying the sexual desire of defendant, subjected [REDACTED], who was then less than seventeen years of age, to sexual contact by touching [REDACTED]'s breasts.

The range of punishment for a class E felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than two (2) years and not to exceed four (4) years; or by imprisonment for a special term not to exceed one (1) year in the county jail or other authorized penal institution; or by a fine not to exceed ten thousand dollars (\$10,000); or by both imprisonment and a fine. If money or property has been gained through the commission of the crime, any fine imposed may be not more than double the amount of the offender's gain from the commission of the crime.

Count VI. Enticement Or Attempted Enticement Of A Child (actor 21 Yrs Of Age Or Older And Child Less Than 15 Yrs Of Age) (566.151-001Y201764100)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.151, RSMo, committed the **Felony of Enticement of a Child**, punishable upon conviction under Section 566.151, RSMo, and is subject to lifetime supervision under Section 217.735, RSMo, in that on or between February 1, 2017, and April 28, 2017, in the

County of Jackson, State of Missouri, the defendant, who was twenty-one years of age or older, enticed [REDACTED] who was less than fifteen years of age, by removing his clothing in her presence, and the defendant did so for the purpose of engaging in sexual conduct with a person less than fifteen years of age.

An individual convicted of this offense is not eligible for probation or parole for a period of five years.

Defendant is a prior offender under Section 558.016, RSMo., in that he has pleaded guilty to a felony as follows:

1. On or about October 16, 1998, defendant pleaded guilty to the felony of burglary in the first degree in the Circuit Court of Jackson County, Missouri, in case number 16CR96002001.

JEAN PETERS BAKER
Jackson County Prosecuting Attorney

by, /s/Harrison T. Blue

Harrison T. Blue (#69969)
Assistant Prosecuting Attorney
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WITNESSES:

[REDACTED]
PO Brian A. Cooper, 1125 Locust, Kansas City, MO 64106

[REDACTED]
PO Chase H. Kuehl, 1125 Locust, Kansas City, MO 64106

[REDACTED]
DET Jennifer D. Zimmerman, 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01/02/2018

CRN: 17-068045

I, Det. Jennifer Zimmerman 5058
(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 4/29/15 - 8/2/17, at 3808 Fuller Ave. in
(Date) (Address)

Kansas City, Jackson Missouri Warren, Robert J
(County) (Name of Offender(s))

B/M 07/27/1959 committed one or more criminal offense(s).
(Description of Identity)

**CHILD MOLESTATION
SODOMY
SEXUAL MISCONDUCT**

The facts supporting this belief are as follows:

On 08/02/2017 officers with the Kansas City Missouri Police Department were dispatched to 2█ Prospect Ave. Upon arrival officers contacted █ 14 year old █, █, father of █ █, █ of █ who reported a sexual assault/child molestation that occurred at █ Fuller Ave., Kansas City, Jackson County, Missouri.

On 08/14/2017 █ responded to the Child Protection Center (CPC) and participated in a forensic interview. █ stated █ was at CPC because for the last two years █ grandmother's husband, **ROBERT WARREN** has been trying to touch █. The first time something happened, █'s grandmother was not home and █ was on the couch in the front room. From a reflection in a mirror, █ observed **WARREN** behind the couch "jacking off." When asked what █ meant by "jacking off" █ indicated, by demonstrating with █ hand, his hand was moving back and forth. When asked if he was touching a part of his body while he was jerking off, █ stated he was touching his "wiener." █ got uncomfortable and went to █ room where █ fell asleep. **WARREN** responded to █ room and tried to pull the covers off of █ and tried putting his hand down █ pants. █ pushed him off and told him to get out of █ room. **WARREN** told █ "do you want this" and offered █ money to keep quiet.

On another occasion **WARREN** got on his knees on the floor. He put his hands on either side of █ and attempted more than one time to put his head in her lap. █ tried to push him away and told him to stop. █ got up to go to █ room and **WARREN** walked up behind █ and started touching █ over █ clothes with his hands. This occurred when █ was 14 years old.

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On the [REDACTED] [REDACTED] took the pictures of WARREN, [REDACTED] was sitting on the couch in the front room. WARREN came out of his room and was on the phone. WARREN removed his "wiener" from his pants and started to "jack off." WARREN was wearing "firey pants" that he "unbuckled and whipped it out." [REDACTED] took photos and a video of WARREN during this time using snapchat on [REDACTED] phone [REDACTED] was 14 years old when this occurred.

There was another incident that occurred somewhere other than [REDACTED] grandmother's house. [REDACTED] went with WARREN to take one of his semi-trucks to a lot. WARREN parked the truck at the end of the street [REDACTED] was in the front seat of the truck on [REDACTED] phone when WARREN took off his clothes and attempted to get [REDACTED]'s attention. [REDACTED] turned around, saw him naked and started to get out of the truck. WARREN told [REDACTED] not to get out and told [REDACTED] to just give him some. This occurred during spring break when [REDACTED] was 13 years old.

[REDACTED] was presented with an anatomically correct drawing of a school aged boy. On the drawing, [REDACTED] recognized "wiener" as WARREN's penis. [REDACTED] was also presented with an anatomically correct drawing of a school aged [REDACTED] When asked if [REDACTED] saw the parts that WARREN touched [REDACTED] stated yes. [REDACTED] recognized "boobs" as her breasts and "pocket book" as [REDACTED] [REDACTED] stated WARREN touched her "pocket book" more than one time. WARREN used his hand to touch her "pocket book" over the clothes and under [REDACTED] clothes. [REDACTED] stated he would "rub on it." WARREN has also touched the inside of [REDACTED]'s "pocket book" with his hand. [REDACTED] told him to leave her alone and he gave [REDACTED] money.

On 08/30/2017 [REDACTED] responded to 1125 Locust to provide a statement. [REDACTED] stated the police responded to [REDACTED] residence when [REDACTED] confronted [REDACTED] ROBERT WARREN after [REDACTED] saw inappropriate pictures of him. [REDACTED] stated in the pictures WARREN had an erection and he was showing [REDACTED] WARREN had his clothes on but his penis was pulled out. When asked if this was the first time something like this had happened or that [REDACTED] had been notified of, [REDACTED] stated [REDACTED] had tried telling her earlier [REDACTED] has a habit of lying so [REDACTED] did not believe [REDACTED] Once [REDACTED] saw the pictures "I put two and two together" and [REDACTED] called the police. [REDACTED] stated two years ago [REDACTED] was in a truck with WARREN. [REDACTED] [REDACTED], WARREN took off his clothes and tried to pull her into the bunk in the back. [REDACTED] has not spoken to [REDACTED] about any other incidents involving WARREN.

On 08/30/2017 RC responded to 1125 Locust to provide a statement. [REDACTED] explained on 08/02/2017 he was upstairs sleeping when [REDACTED] entered his room and told him WARREN "was pretty much assaulting [REDACTED] coming on to [REDACTED]" [REDACTED] showed [REDACTED] a video of WARREN with his penis sticking out of his pants. [REDACTED] also took two photos. The video and photos showed WARREN "from head to toe." [REDACTED] called [REDACTED] to let her know what was going on. After [REDACTED] returned home, they all responded to the police station and made a report.

PROBABLE CAUSE STATEMENT FORM

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Several attempts have been made to contact **WARREN** for a statement which have been met with negative results.

Printed Name Det. Jennifer Zimmerman 5058 Signature Det. Jennifer Zimmerman 5058

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

Judge

Circuit Court of _____ County, State of Missouri.