IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT

POLICE NO	.: 23-026239
PROSECUTOR NO	.: 095475013
OCI	N: QO011957
STATE OF MISSOURI,)
,	AINTIFF,)
vs.)
)
ZACHARY I CALDWELL)
11205 E. 27th Street S.) CASE NO. 2316-CR
Independence, MO 64052) DIVISION
DOB: 03/23/1999)
Race/Sex: W/M)
)
DEF	ENDANT.)

COMPLAINT WARRANT REQUESTED

Count I. 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 April 20, 2023, in the County of Jackson, State of Missouri, the defendant forcibly stole US Currency in the possession of Walgreens, and in the course thereof the defendant threatened the immediate use of a dangerous instrument against Victim 1, a Walgreens

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 II. 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 May 14, 2023, in the County of Jackson, State of

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Missouri, the defendant forcibly stole US Currency in the possession of CVS, and in the course thereof the defendant threatened the immediate use of a dangerous instrument against Victim 2, a CVS employee.

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 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 May 20, 2023, in the County of Jackson, State of Missouri, the defendant forcibly stole US Currency in the possession of Metro by T-Mobile, and in the course thereof the defendant threatened the immediate use of a dangerous instrument against Victim 3, a Metro by T-Mobile employee.

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. 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 June 7, 2023, in the County of Jackson, State of Missouri, the defendant forcibly stole US Currency in the possession of Metro by T-Mobile, and in the course thereof the defendant threatened the immediate use of a dangerous instrument against Victim 4, a Metro by T-Mobile employee.

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.

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.

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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/ Clayton O Whitworth
Clayton O Whitworth (#69780)
Assistant Prosecuting Attorney
321 W Lexington Ave
Independence, MO 64050
(816) 881-3834
cwhitworth@jacksongov.org

WITNESSES:

2.

- 1. PO David Abraham, 223 N. Memorial Drive, Independence, MO 64050
- 4. DET Logan Waterworth, 223 N. Memorial Drive, Independence, MO 64050

PROBABLE CAUSE STATEMENT

Date: 6/28/2023 Report #: 2023-26239

I, Logan Waterworth, 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.

- 1. I have probable cause to believe that on 4/20/2023, at 1233 hours, Zachary I. Caldwell, (Race- White, Sex- Male, DOB- 03/23/1999, Address-11205 E. 27th Street S., Independence, Missouri, Committed one or more criminal offenses in Jackson County, Missouri.
- 2. The facts supporting this belief are as follows:

On April 20, 2023, at approximately 1238 hours, the Independence Police Department received a call from Walgreens, located at 2261 South Sterling Avenue, Independence, Jackson County, Missouri, regarding an armed robbery.

Upon arrival, IPD Officer Salazar contacted Victim #1, who was the cashier at the time of the robbery. Victim #1 stated that a tall white male, maybe 6'1" or 6'2" wearing a dark green zip up jacket, dark mask, and glasses, walked up to the counter and held his phone up so Victim #1 could read it. Victim #1 stated there was a note written on the suspect's phone stating, "I have a gun, give me all the money in the register." Victim #1 stated after reading the message, he/she immediately gave the suspect the money, which was estimated to be \$253 in US currency. Victim #1 stated the subject never displayed a weapon and no weapon was ever seen.

Video footage was captured by Walgreens and Price Chopper, located at 2301 S. Sterling Avenue, Independence, Jackson County, Missouri, of the robbery and suspect description.

I have probable cause to believe that on 5/14/2023, at 1630 hours, Zachary I. Caldwell, (Race-White, Sex- Male, DOB- 03/23/1999, Address-11205 E. 27th Street S., Independence, Missouri, committed one or more criminal offenses in Jackson County, Missouri.

On 05/14/2023, at approximately 1630 hours, the Independence Police Department received a call from CVS Pharmacy, located at 1315 West 23rd Street, Independence, Jackson County, Missouri, regarding an armed robbery.

Upon arrival, IPD Officer Gehring contacted Victim #2, who was the only employee and cashier working at CVS. Victim #2 stated an unknown white male entered the store wearing a black hooded sweatshirt, with the hood up, and a COVID mask covering his face. The male walked around the store for approximately seven minutes before approaching her/him at the cash register, where the suspect presented a message to her/him on the suspect's cell phone. To the best of Victim #2's recollection, the message read "I have a gun empty your register".

Victim #2 stated the suspect did not speak at any point during the robbery and after reading the message she/he asked him "are you serious", to which the suspect nodded his head yes.

Victim #2 emptied the only cash register she/he had open, handing the male \$383 in US currency (cash bills), consisting of denominations \$20 and less. After taking the money, the suspect exited the store and fled westbound from the business. Video footage was captured by CVS of the robbery and suspect description.

I have probable cause to believe that on 5/20/2023, at 1445 hours, Zachary I. Caldwell, (Race-White, Sex-Male, DOB- 03/23/1999, Address-11205 E. 27th Street S., Independence, Missouri, committed one or more criminal offenses in Jackson County, Missouri.

On 05/20/2023, at approximately 1445 hours, the Independence Police Department received a call from Metro by T-Mobile, located at 10808 E. 23rd Street, Independence, Jackson County, Missouri, regarding an armed robbery.

Upon arrival, IPD Officer Carver contacted Victim #3, who stated a man walked in and advised "I have a gun". Victim #3 asked the suspect to repeat himself. After repeating himself, the suspect stated to Victim #3, "I need you to give me all of the money in the register". Victim #3 handed over all the money in the drawer and the man fled on foot from the business.

Victim #3 described the suspect as around 6'2 with a slender build. Victim #3 identified the suspect as a white male and was wearing dark jeans, black hoodie, white surgical mask, dark glasses, and black shoes. Victim #3 stated the suspect never brandished a firearm and that the suspect kept touching his own back as if the firearm was in the small of his back in his waistline. Victim #3 advised the suspect left with \$900 in US currency, including four \$100 bills, and the rest was \$20 bills.

Video footage was captured by Metro by T-Mobile of the robbery and suspect description.

I have probable cause to believe that on 6/7/2023, at 1550 hours, Zachary I. Caldwell, (Race-White, Sex-Male, DOB- 03/23/1999, Address-11205 E. 27th Street S., Independence, Missouri, committed one or more criminal offenses in Jackson County, Missouri.

On 06/07/2023, at approximately 1550 hours, the Independence Police Department received a call from Metro by T-Mobile, located at 10808 E. 23rd Street, Independence, Jackson County, Missouri, regarding an armed robbery.

Upon arrival, IPD Officer Gaudreau contacted Victim #4, who stated a white male, approximately 6'0, skinny build, black shorts, black hoodie with hood up and black hat on, walked into the store. Victim #4 stated the suspect walked up to the register and told him/her to "give me the money or I'll blow your head off." A customer, who had previously been in the store, entered the store and Victim #4 informed the customer in Spanish "robbery" and the customer stated, "yes he has a gun". Victim #4 hurried to the drawer and gave the suspect all the money that was in the cash register, which Victim #4 identified as approximately \$363 in US currency. The suspect then ran out of the store and fled in a northwest direction on foot.

Victim #4 stated the suspect never pointed a gun at him/her and he/she never seen a weapon. Video footage was captured by Metro by T-Mobile of the robbery and suspect description. IPD

Officer Gaudreau reviewed the video and believed the suspect was the same suspect that robbed the store on May 20, 2023.

On June 18, 2023, at approximately 1548 hours, the Independence Police Department received a call from Advanced Auto Parts, located at 2323 S. Sterling Avenue, Independence, Jackson County, Missouri, regarding an armed robbery. During this robbery, the suspect stated to Victim #5 "I have a gun in my pocket, I don't want to hurt nobody, give me all the cash in the drawer." Victim #5 refused to comply with the suspect and the suspect fled from the store on foot without obtaining any money.

During a check of the area, IPD Officer Allen contacted a white male, identified as Zachary I. Caldwell (W/M, 03/23/1999), who was walking on foot in the area of the robbery. Victim #5 responded to IPD Officer Allen's location but could not positively identify Caldwell as the suspect who committed the attempted robbery due to Caldwell discarding the hooded sweatshirt and hat he was wearing during the robbery while fleeing on foot. Caldwell was released at the scene.

On June 27, 2023, I began reviewing all the video footage captured from the robberies and was able to identify Caldwell as the suspect that committed the attempted robbery at Advanced Auto Parts. Clear surveillance video was captured at Price Chopper, located at 2301 S. Sterling Avenue, Independence, Jackson County, Missouri, of Caldwell entering the store just prior to the robbery. Caldwell at this time was not wearing any face covering and I was able to positively identify that this was the same subject IPD Officer Allen stopped after the attempted robbery at Advanced Auto Parts. After closely looking at video surveillance from the other robberies, I was able to determine that the suspect in each robbery was wearing the same glasses Caldwell was wearing when he was stopped by IPD Officer Allen.

Based off this information, IPD Street Crimes Unit detectives conducted surveillance at Caldwell's residence, identified as 11205 E. 27th Street, Independence, Jackson County, Missouri, in an attempt to arrest him on an outstanding municipal warrant out of Independence and question him regarding the five robberies. After a short period of time, Caldwell departed from the residence and Caldwell was arrested without incident on the outstanding municipal warrant. Caldwell was transported and booked into the IPD detention facility.

On June 27, 2023, at approximately 1821 hours, IPD Detective Showman and I conducted an interview with Caldwell. During the *Mirandized* interview, Caldwell admitted to committing the robberies listed above. Caldwell stated he committed the robberies to obtain money to help his grandma pay outstanding utilities bills. Eleven (11) still shot images were shown to Caldwell from the robberies. Caldwell positively identified the location of each picture and identified himself as being in the picture. Furthermore, Caldwell admitted during each robbery he made a threat of being armed with a gun to all the victims. Caldwell stated he never possessed a gun during any of the robberies but told the victim's he had a gun so they would take him seriously.

Logan Waterworth #1362	Togan	Waternath # 1362
Print Name	Signature	
THE COURT FINDS PROBAB	LE CAUSE:	
Date	 Judge	