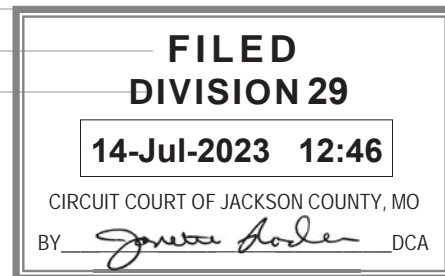


**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY**

POLICE NO. :	KC23043572
PROSECUTOR NO. :	095475192
OCN:	HU013795



STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
)	
WILLIAM LAWRENCE SHADE)	
712 West 74th Street)	CASE NO. 2316-CR
Kansas City, MO 64114)	DIVISION
DOB: [REDACTED])	
Race/Sex: W/M)	
S.S.N.: [REDACTED])	
)	DEFENDANT.

COMPLAINT
WARRANT REQUESTED

Count I. Robbery - 1st Degree (570.023-001Y20201201.0)

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 July 5, 2023, in the County of Jackson, State of Missouri, the defendant forcibly stole prescription medications in the possession of CVS, and in the course thereof the defendant stole Lorazepam and Alprazolam, controlled substances, from CVS, a pharmacy.

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. 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, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about July 5, 2023, in the County of Jackson, State of

Missouri, the defendant committed the felony of robbery in the first degree charged in Count I, 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/ John G. Gromowsky
John G. Gromowsky (50700)
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State vs. William Lawrence Shade, Case No.

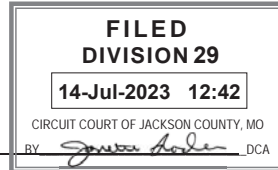
WITNESSES:

The State's witnesses as of 7/14/2023 are included on the "State's Witness List" filed contemporaneously with this Complaint.

PROBABLE CAUSE STATEMENT FORM

Date: /07/13/2023

CRN: 23043572/23022495



I, [Redacted], Robbery Unit, Kansas City Missouri Police Department (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 07/05/2023, at [Redacted] in (Date) (Address)

Kansas City, Jackson Missouri William L Shade (County) (Name of Offender(s))

WM [Redacted] committed one or more criminal offense(s). (Description of Identity)

The facts supporting this belief are as follows:

On 07/05/2023 at 1338 hours, Patrol Officers with the Kansas City Missouri Police Department responded to the [Redacted], located at [Redacted], Kansas City, Jackson County, Missouri, in regard to an armed robbery.

Officers contacted Victim#1 who informed them that a white male, later identified as William L. Shade, walked into the back of the pharmacy area and [Redacted] asked Shade what he was doing there. Shade told [Redacted] he wanted all the Alprazolam and Lorazepam. When [Redacted] asked if this was a robbery, Shade told [Redacted] he was serious and placed a small handgun on the counter.

On 07/05/2023, a detective conducted an interview with Victim#1. [Redacted] was working in the pharmacy and a man walked in. Usually the door is closed and locked, but had been propped open with a sharp's container. The man told [Redacted] "I want all of your Lorazepam and Alprazolam. [Redacted] thought he was confused and explained he needed to go to the other side of the counter for pick-ups. He moved towards [Redacted] counter and stated "Yes, this is a robbery". [Redacted] wasn't sure what to do so [Redacted] walked into an aisle of medication and paged [Redacted] and let [Redacted] know [Redacted] was being robbed. [Redacted] came back with one bottle of Lorazepam and two bottles of Alprazolam. He laid a gun on the counter and kept telling [Redacted] that it was a robbery. [Redacted] walked into the pharmacy and the man told [Redacted] that he was robbing them and to go sit down. The man then asked [Redacted] to put the bottles in a brown bag which [Redacted] did and he said "Have a good lunch" and left the store.

[Redacted] described the suspect as: A white male, approximately 6'00 feet tall, with a normal build with a belly. Wearing a hat, glasses, polo shirt, a blue medical mask, jeans. [Redacted] described the weapon as a small thin black gun.

On 07/05/2023, a detective conducted an interview with Witness #1. [Redacted] was [Redacted] and received a phone call from [Redacted]. [Redacted] told [Redacted] that [Redacted] was being robbed. [Redacted] walked to the back and saw a guy standing in the back of the Pharmacy. [Redacted] asked the guy "Hey what are you doing?", the

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guy replied "[REDACTED] helping me". [REDACTED] asked the guy "Why are you in the Pharmacy?" and the guy replied "I'm making a withdrawal" [REDACTED] asked "Are you robbing us?" and the guy replied "Yes, sit down." So [REDACTED] did and the guy took a bag from [REDACTED] and walked out of the store and walked east through the [REDACTED] parking lot. [REDACTED] used the panic alarm on [REDACTED] phone to call 911.

[REDACTED] described the suspect as: A white male, approximately 6'00 feet tall, with a normal build with a gut and in his sixties, with gray hair and a short white/gray beard. Wearing an orange baseball cap, glasses, maroon shirt, a blue medical mask, Khaki pants, and black gloves.

On 07/05/2023 at 1420 hours, a detective recovered video of the robbery from the [REDACTED]. Exterior surveillance video from the [REDACTED], located at [REDACTED] was also recovered. The [REDACTED] confirmed that there was video of Shade walking through the [REDACTED] parking lot after the robbery. The detective determined that the Shade was wearing an orange Titleist baseball cap with a Longhorns logo on the left side. Bright blue athletic shoes with white soles and black trim. Black nitrite style gloves. A red polo shirt. And used a small black pistol to commit the robbery.

On 07/08/2023, the Kansas City Missouri Police Department released information about he robbery to public media outlets. The information included the date, location, and still shots of the suspect from the robbery.

07/10/2023, Two tips were received through the Greater Kansas City Crime Stoppers that identified Bill Shade as the suspect of the robbery. Both tips identified Mr. Shade as living at [REDACTED].

One tip identified William L. Shade WM [REDACTED] as being involved in a prior incident at the Walgreens pharmacy located at 7500 Wornall Road on 04/12/2023. During the incident Shade, while waiting in line at the pharmacy, began to yell "you need extra help, right now". One of the assisting pharmacy techs advised Shade "sir, I'm helping the drive through". He also stated "sir, we don't have anybody". The pharmacist heard someone yell "Oh my god, oh my god, he has a gun". He looked up to see Shade pointing a black and gray handgun at him and the tech. All the employees and customers in the area ran away. He backed up behind the counter out of the line of sight of Shade. He then looked out the consultation window and observed Shade still waiting. He stated "you need to leave now". Shade said "I'm not leaving without my prescription". He replied "I don't wait on people who draw guns on me". He then joined several employees in a back room and waited for Shade to leave. Officers documented that they identified a suspect vehicle as a silver Chrysler 300 with a Missouri license of [REDACTED]. The license plate was registered to a William Shade who has a DOR listed address of [REDACTED].

07/12/2023, Detectives conducted an area canvass in the [REDACTED] in an attempt to locate [REDACTED] who may be able to identify him from the CVS still shots. [REDACTED], identified Mr. Shade [REDACTED] and stated that the man in the still shots did appear to be Mr. Shade.

[REDACTED] was contacted and [REDACTED] identified Shade as [REDACTED]. [REDACTED] looked at the still shots and identified the man as Bill Shade. [REDACTED] added that [REDACTED] has seen Shade wearing the orange Titleist baseball cap and the bright blue athletic shoes, seen in the still shots. [REDACTED] also stated that when [REDACTED] he is always carrying a small black pistol.

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On 07/13/2023, a search warrant was served at [REDACTED] [REDACTED] [REDACTED] and Shade was taken into custody. Shade was taken out of handcuffs while still at the scene and was read the Miranda Warning and Waiver, he acknowledged that he understood. A detective asked him if he had a small black pistol. He confirmed that he owned multiple firearms including rifles and pistols. He then added that he regularly carried a small black 9mm Sig Sauer pistol and told the detective that the pistol was on his desk in the front westside room of the first floor of the residence. Shade was transported to the Metro Detention Unit.

The residence was processed and twenty-three photographs were taken of the residence and property. The following items were located: orange Titleist baseball cap with a Texas Longhorns logo on the side, bright blue Asics athletic shoes, three red polo shirts, a black Sig Sauer pistol (52B010332), one pair of used nitrile gloves, one bottle of Alprazolam containing pills, one bottle of Lorazepam with a blue mark on the label containing pills. It should be noted that the bottles matched the ones from the photograph the victim had taken prior to placing them in the brown bag and handing them to Shade. All of the other listed items matched the surveillance still shots from the [REDACTED].

On 07/13/2023, Detectives responded to the Metro Detention Unit and contacted Shade for an interview.

Shade was escorted to an interview room and read the Miranda Warning and Waiver, he acknowledged that he understood.

Shade then stated that he would not provide a statement and requested legal representation.

The underlying offense is related to a serious felony currently being investigated by Kansas City Missouri Police Department which is punishable by significant penalties that incentivize the defendant to fail to appear.

Printed Name [REDACTED] Signature /s/ [REDACTED]

The Court finds probable cause and directs the issuance of a warrant this 14th day of July, 2023.

[Handwritten Signature]
Judge

Circuit Court of Jackson County, State of Missouri.