

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

Police# 16-070883
Prosecutor# 095435103
1616-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Zebadiah C. Wilson
Unknown
Kansas City, MO 64106
DOB: 02/09/1988; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Burglary 1st Degree (569.160-001Y19792202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class B felony of burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly entered unlawfully in an inhabitable structure, located at 2 [REDACTED] W. 62nd St., Kansas city, Missouri, and owned by [REDACTED] for the purpose of committing stealing therein, and while in such inhabitable structure defendant threatened immediate physical injury to [REDACTED] who was not a participant in the crime.

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. Attempted Burglary 1st Degree (569.160-001Y19792299.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.160, RSMo, committed the class C felony of attempted burglary in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about September 21, 2016, in the County of Jackson, State of Missouri, the defendant knowingly attempted to enter an inhabitable structure, located at 1 [REDACTED] W. 61st Terrace, Kansas City, Missouri 64113 and possessed by [REDACTED] and [REDACTED] by jigging the front and back doorknobs and pulling at the screen on a window, and he did so for the purpose of

committing stealing therein. When defendant did so, there were present in such Inhabitable structure [REDACTED] and [REDACTED], persons who were not participants in the crime and such conduct was a substantial step to the commission of the crime of burglary in the first degree.

The range punishment for a class C 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 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count III. Trespassing 2nd Degree (569.150-001N20035707.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.150, RSMo, committed the infraction of trespass in the second degree, punishable upon conviction under Section 560.016, RSMo, in that on or about September 22, 2016, in the County of Jackson, State of Missouri, the defendant entered unlawfully upon real property located at 3 [REDACTED] Huntington Rd., Kansas City, Missouri 64113 and owned by [REDACTED].

The range of punishment for an infraction is a fine not to exceed two hundred dollars (\$200.00).

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.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

THE STATE OF MISSOURI

vs.

Zebadiah C. Wilson

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

Mary Beth Lundak (#38654)
Assistant Prosecuting Attorney
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PROBABLE CAUSE STATEMENT FORM

Date: 09-22-2016

CRN: 16-070883

I, Det. Jacob Shroyer #5509, 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 09/21/2016, at 210 W. 62nd St. in
(Date) (Address)

Kansas City, Jackson Missouri Wilson, Zebadiah C.
(County) (Name of Offender(s))

W/M, 02/09/1988, SSN: committed one or more criminal offense(s).
(Description of Identity)

The facts supporting this belief are as follows:

- Armed Robbery
1st Degree Burglary
Attempted 1st Degree Burglary
Possession of Controlled substance

(16-070883)On 09/21/2016 at about 1837 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 210 W. 62nd St. Kansas City, Jackson County, Missouri on a reported residential burglary. While enroute to the dispatched address additional Officers were dispatched to several other locations regarding residential burglaries and a prowler in the same area with the same suspect description of a W/M 20's no shirt running towards the plaza.

Upon arrival officers made contact with the victim who stated the following: He arrived home at about 1830 hours and noticed pillows from his couch on the floor, and his dog seemed to be upset. As was tending to his dog, the suspect later identified as (Wilson, Zebadiah C. W/M 02/09/1988) came running from the kitchen, pointed a gun at him, and told him to get on the floor. Wilson further threatened he had one bullet and he was going to kill him. Initially, backed away slowly with his hands up. Then Wilson told him there was another person in the house then suddenly lunged at Wilson, closing the distance, grabbing ahold of the rifle. was able to wrestle the rifle away from Wilson and throw it to the floor. He then grabbed Wilson by the throat, slammed him against the wall and then threw him to the ground, fearing there was a second suspect in the house, disengaged and began to run out of the front door. Wilson got back up and managed to run past out the front door and down the street. then called 911 to report the residential robbery. While was outside waiting for police, he heard a noise coming from the behind his residence. When he went to see what was happening, he noticed his neighbor questioning Wilson. He told his neighbor what had just happened and Wilson again fled the scene on foot. He described the suspect as a W/M, early to mid 20's, 5'9"-5'10", 130 lbs, short brown hair, tattoos on upper arm (possibly right), tattoos on leg, blue shorts, no shirt.

(16-070885)Officers responded to 1 W. 61st Terr. Kansas City, Jackson County, Missouri on a reported residential burglary.

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CRN 16-070883

Upon arrival Officers made contact with two victim's [redacted] and [redacted]. [redacted] stated the following: she and [redacted] observed a suspect, identified as **Wilson** run into their front yard, run around the east side of the house and entered their neighbor's garage. She stated she observed him carrying an orange and black bag at this time. She stated she observed **Wilson** pulling on the door handles of her neighbor's car and then he approached the rear of her home. She stated **Wilson** kept knocking on the backdoor and giggling the door knob. She stated they were scared and called 911. **Wilson** then ran around to the front of their house and began pulling at the screen on the center, front window. **Wilson** then ran away, heading north between the houses and through back yards.

[redacted]'s statement was consistent with [redacted]'s statement

(16-70887)Officers responded to 62 [redacted] Wornall Rd, Kansas City, Jackson County, Missouri on a reported residential burglary.

Upon arrival Officers contacted the victim [redacted], who stated the following: she arrived home today at 1600 hours, and observed her garage door closed. She went inside of the house and stayed on the second floor with her dog, and at approximately 2010 hours, she opened her basement door and observed things in her basement misplaced. She then walked out onto her patio and observed her garage door opened. She then called police once she believed someone had broken into her residence. She noticed clothes and a laundry basket to be missing from her residence.

Officers observed a black 9mm handgun in the basement of the residence with blood on it which was processed for evidence.

(16-070888)Officers responded to the area of Huntington and Wornall where they were contacted by a victim who stated the following: She was with her friend at 3 [redacted] Huntington Rd when her friend went out back to open the door to their shed that is attached to the house. When he tried to open the door but someone was holding the door shut. Officers then responded to 3 [redacted] Huntington where they then contacted the listed suspect who was identified as, **Wilson, Zebadiah C. W/M 02/09/1988** and he was taken into custody. A clear bag with a green leafy substance was found next to **Wilson** which tested positive for Marijuana. A garage door opener was also located next to **Wilson** which was determined to belong to the victim of (16-070883).

Wilson was arrested and transported to a local hospital for injuries.

Detectives responded to the scenes and conducted interviews. (16-070885) [redacted] and [redacted] were taken to where **Wilson** was taken into custody and positively identified him as the suspect who was trying to get into their house.

The victim [redacted] from, (16-070883) was transported HQ where he provided a formal statement. During the statement [redacted] was shown a photo lineup of **Wilson** and identified **Wilson** as the suspect who was in his house and who he fought with.

Printed Name Det. Jacob Shroyer #5509

Signature

Det Jacob Shroyer 5509

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

PROBABLE CAUSE STATEMENT FORM

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Judge

Circuit Court of _____ County, State of Missouri.