

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

Police# 17-003794
Prosecutor# 095437195
1716-CR
OCN# C0052376

COMPLAINT

STATE OF MISSOURI

vs.

**Cheyenne N. Mellon
Homeless
Kansas City, MO 64106
DOB: 04/14/1999; Race/Sex: W/F;
SS# [REDACTED]
Defendant.**

Count I. Robbery - 1st Degree (570.023-001Y20171205.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of

Section 569.020, 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 January 16, 2017, in the County of Jackson, State of Missouri, the defendant, acting purposefully in concert with others, forcibly stole a 1997 Ford Mustang owned by [REDACTED], and in the course thereof the defendant and/or another participant in the crime used and threatened the immediate use of a dangerous instrument against [REDACTED].

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 (571.015-001Y19755299.0)

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 January 16, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count One, 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 dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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.

Count III. Resisting Arrest/detention/stop By Fleeing - Creating A Substantial Risk Of Serious Injury/death To Any Person (575.150-002Y20174801.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.150, RSMo, committed the class E felony of resisting a lawful stop, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on January 16, 2017, in the county of Jackson, State of Missouri, Scott Johnson, a law enforcement officer, was attempting to make a lawful stop of a vehicle being operated by the defendant, and the defendant reasonably should have known that the officer was making a lawful stop, and, for the purpose of preventing the officer from effecting the stop, resisted stop of defendant by fleeing from the officer and the defendant fled in such a manner that created a substantial risk of serious physical injury or death to other persons in that the defendant drove at excessive rates of speed for the weather conditions, struck another motor vehicle and crashed into a building damaging the gas line..

The range 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.

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.

PROBABLE CAUSE STATEMENT FORM

Date: 01/16/2017

CRN: 17-003794

17-003805

I, Detective Jennifer Blythe #5490, 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 01/16/2017, at Admiral Blvd and Paseo Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Cheyenne Mellon
(County) (Name of Offender(s))

W/F 04/14/1999 committed one or more criminal offense(s).
(Description of Identity)

- Robbery-1st Degree
Armed Criminal Action
Felony Eluding
Felony Property Damage

The facts supporting this belief are as follows:

On 01/16/2017 at 1059 hours, Officers were dispatched to Phillips 66 located at 702 Paseo Blvd. Kansas City, Jackson County, Missouri in regard to a cutting.

The victim told the officers that he was at Admiral Blvd and Paseo Blvd in the Royal Inn parking lot to check the fluids in his car when he was stabbed by whom he described as a tall white male suspect, later identified as Caleb Patterson W/M 1/21/1998. The victim also stated that he was hit in the head with a crow bar by a shorter, white male, later identified as Zachary Webber W/M 09/08/1996. The two white male suspects and a white female suspect, later identified as Cheyenne Mellon W/F 4/14/1999, then left in the victim's vehicle. At 1107 hours, the victim's vehicle information, 1997 Ford Mustang with a tan convertible top and Oklahoma temporary tags, was broadcast over the radio.

At 1108 hours, Officers observed the victim's vehicle at 20th Street and I 35 traveling east and being driven by Mellon. Officers followed the victim's vehicle to 20th Street and Locust. At 20th and Locust officers activated their emergency lights and attempted to conduct a car check on the victim's vehicle. The suspects eluded officers and stuck a motorist driving a silver Toyota Prius (see CRN 17-3805) at 18th Street and Locust. The suspects and Prius then struck a building, 504 E 18th Street, and a gas line inside of the building causing severe structural damage and placing the general public in danger. Mellon, driver, and Patterson, rear passenger, were taken into custody by officers on the scene. Webber, front right passenger, fled on foot after the vehicle accident and was apprehended shortly after by officers.

Detectives later interviewed the victim at North Kansas City Hospital where he was being treated for numerous lacerations and puncture wounds. The victim stated the following: He was in the area of 31st and Main at a McDonald's when he encountered two white males, a white female, and a black male who all appeared to be homeless. After striking up a conversation with them he decided to have breakfast with them. At approximately 1030 hours, he told the suspects he had to leave. The suspects asked him for a ride to Admiral and Paseo. The victim determined it was on his way to his next appointment and agreed to transport the suspects. Upon arrival his check engine light came on so checked the fluids. The black male then asked for twenty (\$20) dollars. He gave him twenty dollars and the black male suspect walked off. While he was at the front of his vehicle, the tall white male suspect with blue eyes(Patterson) walked up behind him, grabbed him by the shoulder and attempted to stab him with a knife. The victim blocked the strike and attempted to run only to fall down a few steps later. Patterson charged after him while calling for the second shorter white male suspect (Webber) to

PROBABLE CAUSE STATEMENT FORM

CRN 17-003794

17-003805

join in. Patterson then began stabbing him repeatedly. The victim reached into his own pocket and attempted to pull out his own knife, however it was knocked out of his hand immediately. Webber then struck the victim at least two times with a crow bar, and attempted to then stab him with crow bar unsuccessfully. Mellon grabbed the keys and jumped in the driver's seat of the victim's green Ford Mustang. All three suspects left in an unknown direction.

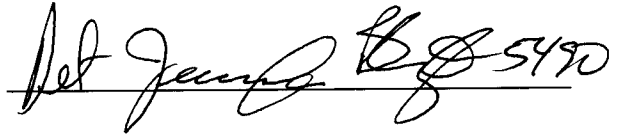
On 01/16/2017, Detectives interviewed Patterson after he waived his Miranda Rights. Patterson stated that Mellon and Webber conspired with him for two to three days to rob the victim of his money and car. The victim and Mellon were in a previous relationship and the victim lives in Oklahoma. The victim drove to Kansas City after Mellon asked him to. Patterson stated that Mellon and Webber wanted to kill him so he would not run his mouth but he did not want to. Patterson admitted to stabbing the victim and stated that Webber assaulted him with a crowbar. Patterson stated that he picked up the victim's wallet and Mellon picked up the victim's car keys from the ground and Mellon drove the victim's car from the scene while he and Webber were passengers. Patterson also stated that Mellon intentionally eluded police after Webber told her to put the pedal to the floor. Mellon stated the robbery was not planned.

On 01/16/2017, Detectives interviewed Mellon after she waived her Miranda Rights. Mellon initially provided officers and detectives a false name for herself and for Webber and Patterson. Mellon also initially denied any involvement in the robbery or that she was acquainted with the victim. Mellon then admitted to witnessing the robbery but denied involvement and stated that she took the victim's car because he gave it to her. Mellon stated that Patterson stabbed the victim and Webber hit him with a crowbar. Mellon stated that she did not want to elude the police but Webber pressed her leg down and held it for the car to accelerate.

On 01/16/2017, Detectives responded to Jackson County Detention Facility and contacted Webber who advised that he did not wish to provide a statement.

Printed Name Det. Jennifer Blythe, #5490

Signature



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

Judge

Circuit Court of _____ County, State of Missouri.

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

Police# 17-003794
Prosecutor# 095437194
1716-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

Caleb B. Patterson
Homeless
Kansas City, MO 64106
DOB: 01/21/1998; Race/Sex: W/M;
SS# [REDACTED]
Defendant.

Count I. Robbery - 1st Degree (570.023-001Y20171202.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.020, 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 January 16, 2017, in the County of Jackson, State of Missouri, the defendant, acting purposefully in concert with others, forcibly stole a 1997 Ford Mustang owned by [REDACTED], and in the course thereof the defendant and/or another participant in the crime used and threatened the immediate use of a dangerous instrument against [REDACTED].

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 (571.015-001Y19755299.0)

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 January 16, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Robbery in the First Degree charged in Count One, 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 dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 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.

Caleb B. Patterson

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

Mary Beth Lundak (#38654)
Assistant Prosecuting Attorney
415 E. 12th St. 11th Floor
Kansas City, Missouri 64106
(816) 881-3555
mlundak@jacksongov.org

WITNESSES:

PO Charles F. Barbosa , 1125 Locust, Kansas City, MO 64106

DET Jennifer A. Blythe , 1125 Locust, Kansas City, MO 64106

PO Carl S. Hutchison , 1125 Locust, Kansas City, MO 64106

PO Scott J. Johnson , 1125 Locust, Kansas City, MO 64106

DET Eric M. Krawchuk , , ,

DET Jacob A. Shroyer , 1125 Locust, Kansas City, MO 64106

DET Kevin M. White , 1125 Locust, Kansas City, MO 64106

PROBABLE CAUSE STATEMENT FORM

Date: 01/16/2017

CRN: 17-003794
17-003805

I, Detective Jennifer Blythe #5490, 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 01/16/2017, at Admiral Blvd and Paseo Blvd in
(Date) (Address)

Kansas City, Jackson Missouri Caleb Patterson
(County) (Name of Offender(s))

W/M 01/21/1998 SSN [REDACTED] committed one or more criminal offense(s).
(Description of Identity)

- Robbery-1st Degree**
- Armed Criminal Action**
- Resist Arrest**
- Felony Property Damage**

The facts supporting this belief are as follows:

On 01/16/2017 at 1059 hours, Officers were dispatched to Phillips 66 located at 702 Paseo Blvd. Kansas City, Jackson County, Missouri in regard to a cutting.

The victim told the officers that he was at Admiral Blvd and Paseo Blvd in the Royal Inn parking lot to check the fluids in his car when he was stabbed by whom he described as a tall white male suspect, later identified as **Caleb Patterson W/M 1/21/1998**. The victim also stated that he was hit in the head with a crow bar by a shorter, white male, later identified as Zachary Webber W/M 09/08/1996. The two white male suspects and a white female suspect, later identified as Cheyenne Mellon W/F 4/14/1999, then left in the victim's vehicle. At 1107 hours, the victim's vehicle information, 1997 Ford Mustang with a tan convertible top and Oklahoma temporary tags, was broadcast over the radio.

At 1108 hours, Officers observed the victim's vehicle at 20th Street and I 35 traveling east and being driven by Mellon. Officers followed the victim's vehicle to 20th Street and Locust. At 20th and Locust, officers activated their emergency lights and attempted to conduct a car check on the victim's vehicle. The suspects eluded officers and stuck a motorist driving a silver Toyota Prius (see CRN 17-3805) at 18th Street and Locust. The suspects and Prius then struck a building, 504 E 18th Street, and a gas line inside of the building causing severe structural damage and placing the general public in danger. Mellon, driver, and **Patterson**, rear passenger, were taken into custody by officers on the scene. Webber, front right passenger, fled on foot after the vehicle accident and was apprehended shortly after by officers.

Detectives later interviewed the victim at North Kansas City Hospital where he was being treated for numerous lacerations and puncture wounds. The victim stated the following: He was in the area of 31st and Main at a McDonald's when he encountered two white males, a white female, and a black male who all appeared to be homeless. After striking up a conversation with them he decided to have breakfast with them. At approximately 1030 hours, he told the suspects he had to leave. The suspects asked him for a ride to Admiral and Paseo. The victim determined it was on his way to his next appointment and agreed to transport the suspects. Upon arrival his check engine light came on so checked the fluids. The black male then asked for twenty (\$20) dollars. He gave him twenty dollars and the black male suspect walked off. While he was at the front of his vehicle, the tall white male suspect with blue eyes (**Patterson**) walked up behind him, grabbed him by the shoulder and attempted to stab him with a knife. The victim blocked the strike and attempted to run only to fall down a few steps later. **Patterson** charged after him while calling for the second shorter white male suspect (Webber) to

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CRN 17-003794


17-003805

join in. **Patterson** then began stabbing him repeatedly. The victim reached into his own pocket and attempted to pull out his own knife, however it was knocked out of his hand immediately. Webber then struck the victim at least two times with a crow bar, and attempted to then stab him with crow bar unsuccessfully. Mellon grabbed the keys and jumped in the driver's seat of the victim's green Ford Mustang. All three suspects left in an unknown direction.

On 01/16/2017, Detectives interviewed Patterson after he waived his Miranda Rights. **Patterson** stated that Mellon and Webber conspired with him for two to three days to rob the victim of his money and car. The victim and Mellon were in a previous relationship and the victim lives in Oklahoma. The victim drove to Kansas City after Mellon asked him to. **Patterson** stated that Mellon and Webber wanted to kill him so he would not run his mouth but he did not want to. **Patterson** admitted to stabbing the victim and stated that Webber assaulted him with a crowbar. **Patterson** stated that he picked up the victim's wallet and Mellon picked up the victim's car keys from the ground and Mellon drove the victim's car from the scene while he and Webber were passengers. **Patterson** also stated that Mellon intentionally eluded police after Webber told her to put the pedal to the floor. Mellon stated the robbery was not planned.

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Printed Name Det. Jennifer Blythe, #5490 Signature  5490

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

Judge

Circuit Court of _____ County, State of Missouri.

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

Police# 17-03794
Prosecutor# 095437193
1716-CR
OCN#

COMPLAINT

STATE OF MISSOURI

vs.

**Zachary T. Webber
Homeless
Kansas City, MO 64106
DOB: 09/08/1996; Race/Sex: W/M;
SS# [REDACTED]
Defendant.**

Count I. Robbery - 1st Degree (570.023-001Y20171205.0)

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THE STATE OF MISSOURI

vs.

Zachary T. Webber

JEAN PETERS BAKER

Prosecuting Attorney
Jackson County, Missouri
by,

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

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(Date) (Address)

Kansas City, Jackson Missouri Zachary Webber
(County) (Name of Offender(s))

W/M 09/08/1996 SSN# [REDACTED] committed one or more criminal offense(s).
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CRN 17-003794

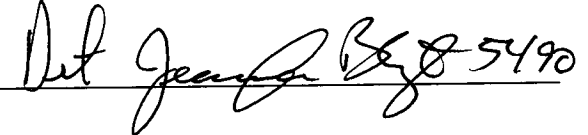
17-003805

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On 01/16/2017, Detectives interviewed Patterson after he waived his Miranda Rights. Patterson stated that Mellon and **Webber** conspired with him for two to three days to rob the victim of his money and car. The victim and Mellon were in a previous relationship and the victim lives in Oklahoma. The victim drove to Kansas City after Mellon asked him to. Patterson stated that Mellon and **Webber** wanted to kill him so he would not run his mouth but he did not want to. Patterson admitted to stabbing the victim and stated that **Webber** assaulted him with a crowbar. Patterson stated that he picked up the victim's wallet and Mellon picked up the victim's car keys from the ground and Mellon drove the victim's car from the scene while he and **Webber** were passengers. Patterson also stated that Mellon intentionally eluded police after **Webber** told her to put the pedal to the floor. Mellon stated the robbery was not planned.

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Printed Name Det. Jennifer Blythe, #5490 Signature 

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

Judge

Circuit Court of _____ County, State of Missouri.