IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT KANSAS CITY 02-Oct

FILED
DIVISION 26
MISSOURI
02-Oct-2024 10:06
CIRCUIT COURT OF JACKSON COUNTY, MO

		CIR
POLICE NO.:	KC24052456	BY_
PROSECUTOR NO.:	095480993	
OCN.		

STATE OF MISSOURI,)
	PLAINTIFF,)
vs.)
)
MANYIUEL EDOON CALDWEI	\mathbf{L})
3544 BALES AVE, Apt. 201) CASE NO. 2416-CR
Kansas City, MO 64128) DIVISION
DOB:)
Race/Sex: B/M)
S.S.N.:)
I	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, 2024, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of and in the course thereof the defendant displayed or threatened the use of what appeared to be a deadly weapon.

Pursuant to 556.061 RSMo, the class A felony of robbery in the first degree is classified as a dangerous felony requiring the defendant to serve 85% of any sentence imposed prior to being eligible for release. The class A felony carries a punishment range of from 10 up to 30 years, or life, in the Missouri Department of Corrections.

Count II. Armed Criminal Action (571.015-001Y20205212.0)

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 on or about July 5, 2024, 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 execution ofsentence for period of ten (10)calendar a years.

Count III. 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, 2024, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of and in the course thereof the defendant displayed or threatened the use of what appeared to be a deadly weapon.

Pursuant to 556.061 RSMo, the class A felony of robbery in the first degree is classified as a dangerous felony requiring the defendant to serve 85% of any sentence imposed prior to being eligible for release. The class A felony carries a punishment range of from 10 up to 30 years, or life, in the Missouri Department of Corrections.

Count IV. Armed Criminal Action (571.015-001Y20205212.0)

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 on or about July 5, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count III, 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 execution of sentence for period of ten a (10)calendar vears.

Count V. 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, 2024, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of and in the course thereof the defendant displayed or threatened the use of what appeared to be a deadly weapon.

Pursuant to 556.061 RSMo, the class A felony of robbery in the first degree is classified as a dangerous felony requiring the defendant to serve 85% of any sentence

imposed prior to being eligible for release. The class A felony carries a punishment range of from 10 up to 30 years, or life, in the Missouri Department of Corrections.

Count VI. Armed Criminal Action (571.015-001Y20205212.0)

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 on or about July 5, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count V, 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 execution of sentence for period of ten a (10) calendar

Count VII. 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 7, 2024, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of

, and in the course thereof the defendant displayed or threatened the use of what appeared to be a deadly weapon.

Pursuant to 556.061 RSMo, the class A felony of robbery in the first degree is classified as a dangerous felony requiring the defendant to serve 85% of any sentence imposed prior to being eligible for release. The class A felony carries a punishment range of from 10 up to 30 years, or life, in the Missouri Department of Corrections.

Count VIII. Armed Criminal Action (571.015-001Y20205212.0)

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 on or about July 7, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count VII, 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 execution of sentence for period of a ten (10) calendar years.

Count IX. 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 7, 2024, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of and in the course thereof the defendant displayed or threatened the use of what appeared to be a deadly weapon.

Pursuant to 556.061 RSMo, the class A felony of robbery in the first degree is classified as a dangerous felony requiring the defendant to serve 85% of any sentence imposed prior to being eligible for release. The class A felony carries a punishment range of from 10 up to 30 years, or life, in the Missouri Department of Corrections.

Count X. Armed Criminal Action (571.015-001Y20205212.0)

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 on or about July 7, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count IX, 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.

Count XI. 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 7, 2024, in the County of Jackson, State of Missouri, the defendant forcibly stole U.S. currency in the possession of and in the course thereof the defendant displayed or threatened the use of what appeared to be a deadly weapon.

Pursuant to 556.061 RSMo, the class A felony of robbery in the first degree is classified as a dangerous felony requiring the defendant to serve 85% of any sentence imposed prior to being eligible for release. The class A felony carries a punishment range of from 10 up to 30 years, or life, in the Missouri Department of Corrections.

Count XII. Armed Criminal Action (571.015-001Y20205212.0)

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 on or about July 7, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of robbery in the first degree charged in Count XI, 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

State vs. Manyiuel Edoon Caldwell, Case No.

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 execution of sentence for period of ten a (10)calendar vears.

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/ Shiante McMahon
Shiante McMahon (#66613)
Assistant Prosecuting Attorney
415 East 12th Street
Floor 7M
Kansas City, MO 64106
(816) 881-3831
SMcMahon@jacksongov.org

WITNESSES:

The State's witnesses as of 10/2/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

Date: 10/01/2024

FILED

DIVISION 26

CRN: 24052456/24052460

02-2465-293424393944

CIRCUIT C240531845240531196

BY 1900 1100 124053196

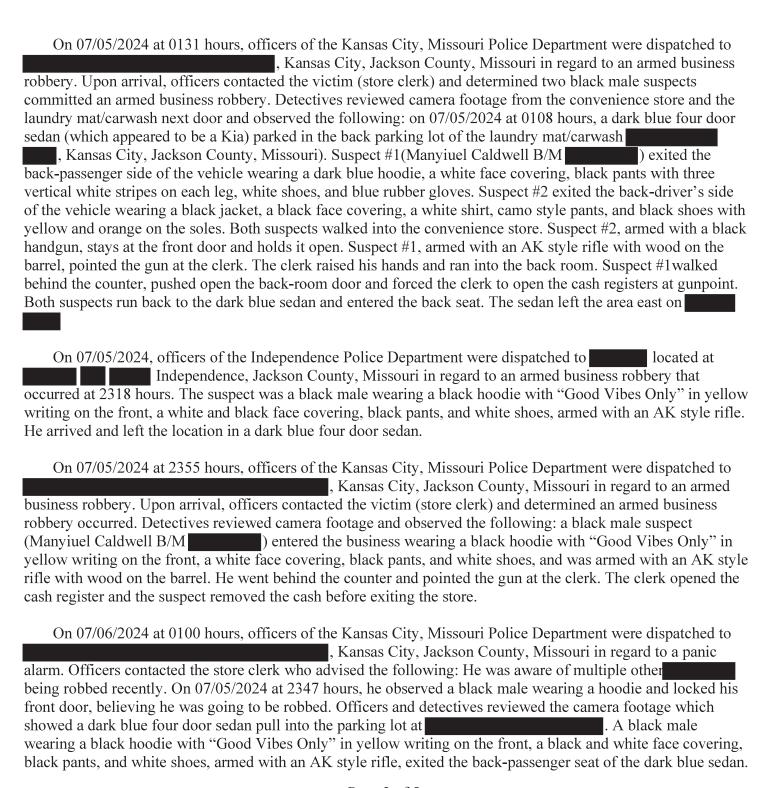
CRN: 24053196

T	17			5	D. H. W. W.	
I,(Name and	identify law enforcement officer				artment Robbery Unit probable cause.)	
knowing that	false statements on this for	m are punis	shable by law	, sta	te that the facts contained herein are tru	ıe.
I have probab	ble cause to believe that on		44	, at _	2636 Van Brunt Boulevard (Address)	in
Kansas City,	Jackson County (County)	_ Missouri	Manyiuel C	Caldy	vell (Name of Offender(s))	
B/M	(Description of Identity	y)		com	nmitted one or more criminal offense(s)).
Detectives of pattern robbed doorbell camera vehicle was a CALDWELL's The driver identities by the official Clothing match was arrested for charged for that residences and venture of the control of the control of the charged for the control of th	On 01/27/2024, the tified himself as Manyiuel Considers on scene and recovered ing the photographs from the Tunlawful Use of a Weaport incident and released from the vehicles driven by him due	souri Police aspect vehicle de vehicle we call well with the call with the call with the call with the call with the continuation of the continuation of the continuation with the call well with the call well well with the call well well with the call well well well well well well well w	le was developed by the stopped to the stopped by t	oped neras The v y off obta vere ve co e rol	found inside the vehicle. CALDWELL He was not ontinued to monitor CALDWELL's observes since he was released from	j ,
business robber suspects commit males walk east wearing a dark shoes and blue it open. Suspect black shoes with the counter and	y. Upon arrival, officers co itted an armed business rob t on before enter blue hoodie, white face cov rubber gloves and was arme t #2 was wearing a black ho h yellow and orange on the	, Kansa intacted the bery. Detecting the store vering, blacked with a blacked with a blacked coat, soles and has the clerk	as City, Jacks victim (store tives reviewe e. Suspect #1 x pants with tack handgun. black face coe was armed	clerical candidates (Machree Suspension Susp	i Police Department were dispatched to County, Missouri in regard to an armed k) and determined two black male amera footage and observed two black anyiuel Caldwell B/M 02/03/2006) was evertical white stripes on each leg, white spect #2 stayed at the front door, holding, white shirt, camo style pants, and a black rifle. Suspect #1 walked behing registers and Suspect #1 took the cash	te g

CRN 24052456/24052460

24052735/24052744

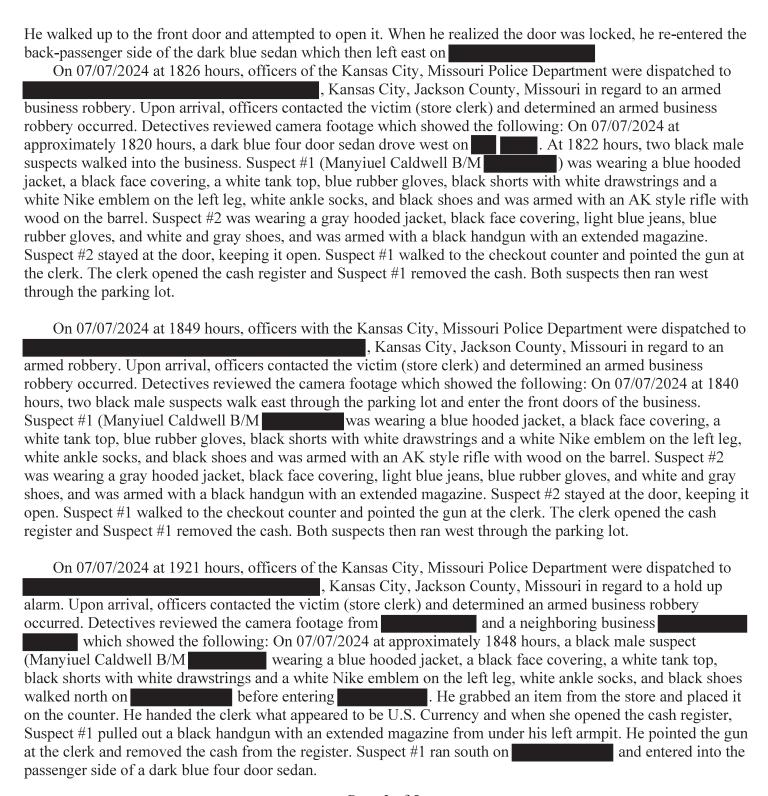
24053184/24053191 24053196



CRN 24052456/24052460

24052735/24052744

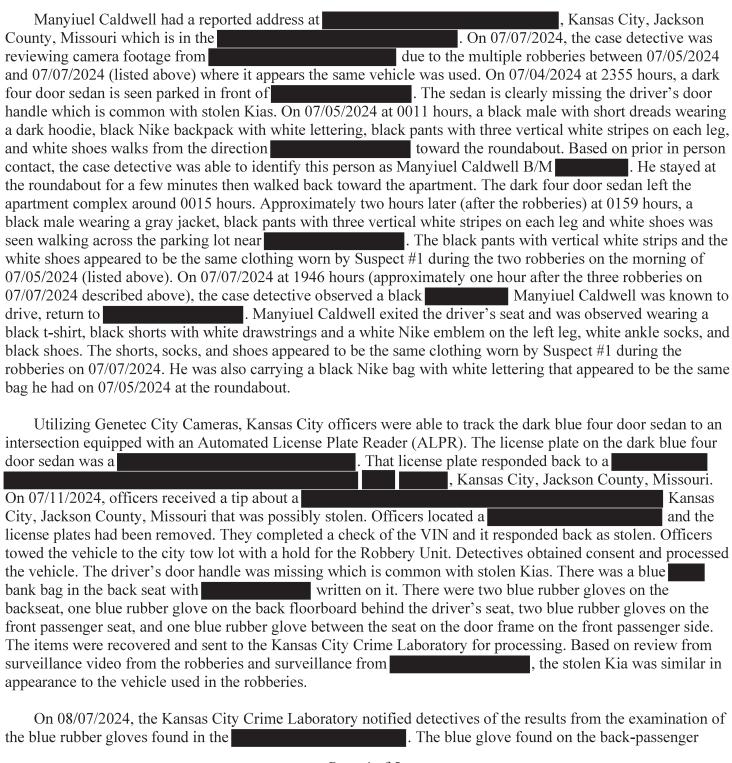
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24053184/24053191 24053196

floor was swabbed for DNA and the swab had four DNA contributors. Manyiuel Caldwell's DNA was compared to the DNA from that swab. There was very strong support for Manyiuel Caldwell to be a contributor to the DNA found on the glove. It was noted that the genetic information from the swab was greater than 1 billion times more likely to be observed if Manyiuel Caldwell and three unknown individuals are the contributors than if four unknown individuals are the contributors.

On 07/17/2024, Manyiuel Caldwell B/M was apprehended and charged for an armed business robbery. During his interview with detectives, he signed a consent form for his buccal swab to be collected. The buccal swab was recovered and sent to the Kansas City Crime Laboratory for processing. He also signed a consent form for his phone data to be downloaded. His phone was taken to the Heart of America Regional Computer Forensics Laboratory (HARCFL) for examination. Detectives applied for and were granted search warrants for the residences and vehicles associated with Manyiuel Caldwell. Detectives located the "Good Vibes Only" hoodie and an AK style rifle with wood on the barrel from the residence where Manyiuel Caldwell was arrested. Detectives located the black pants with three vertical white stripes, white shoes, black shorts with white drawstrings and a white Nike emblem on the left leg from Manyiuel Caldwell's personal vehicle. Manyiuel Caldwell admitted his DNA would be on the AK style rifle detectives located. He also admitted to committing a robbery on Jackson County, Missouri.

On 09/12/2024, the case detective reviewed the examination report from HARCFL. The examiner observed and tagged a photo taken on Manyiuel Caldwell's phone. The photo was taken on the evening of 07/05/2024 at 2203 hours (approximately one hour before the Independence robbery) and appears to be a "selfie". In the photo, Manyiuel Caldwell is wearing a black hoodie with the "Good Vibes Only" in yellow writing and pink mushrooms on the front. He is holding an AK style rifle with wood on the barrel that has a drum magazine attached. The hoodie and the gun appear to be the same items used in the three robberies on the night of 07/05/2024.

Forensic analysis has also linked Manyiuel Caldwell as a suspect to a residential robbery from and he is believed to be the suspect in approximately 35 armed business robberies since December 2023.

Printed Name	Detective Katie Horine #5619	Signature /s/ Det. K	Latie Horine #5619
The Court find	s probable cause and directs the issuance	Tilling	02-Oct-2024 day of
	Circuit Court of	County, State	of Missouri.