

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT

POLICE NO. :	18-077164
PROSECUTOR NO. :	095448946
OCN:	an018434

STATE OF MISSOURI,)	
	PLAINTIFF,)
vs.)	
)	
SAMUEL SCHULER)	
423 Stone Arch Dr.)	CASE NO. 1816-CR
Independence, MO 64052)	DIVISION
DOB: 08/02/1948)	
Race/Sex: W/M)	
████████████████████)	
	DEFENDANT.)

COMPLAINT

Count I. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 12 Yoa (566.062-003Y20171199.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo., committed the felony of attempted statutory sodomy in the first degree punishable upon conviction under Sections 566.062, RSMo., and subject to lifetime supervision under 217.735 and 559.106, RSMo., in that on or between June 30, 2018 and November 1, 2018, in the County of Jackson, State of Missouri, the defendant asked ██████ to touch the penis of the defendant, and such conduct was a substantial step toward the commission of the crime of statutory sodomy in the first degree, and was done for the purpose of committing such statutory sodomy in the first degree.

An individual convicted and sentenced for this offense when the victim is a child less than twelve years of age shall not be eligible for parole until eighty-five percent of the sentence is served.

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Count II. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 12 Yoa (566.062-003Y20171199.1)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo., committed the felony of attempted statutory sodomy in the first degree punishable upon conviction under Sections 566.062, RSMo., and subject to lifetime supervision under 217.735 and 559.106, RSMo., in that on or between June 30, 2018 and November 1, 2018, in the County of Jackson, State of Missouri, the defendant asked [REDACTED] to insert an instrument into the anus of the defendant, and such conduct was a substantial step toward the commission of the crime of statutory sodomy in the first degree, and was done for the purpose of committing such statutory sodomy in the first degree.

An individual convicted and sentenced for this offense when the victim is a child less than twelve years of age shall not be eligible for parole until eighty-five percent of the sentence is served.

Count III. Sexual Misconduct Involving A Child Under 15 - 1st Offense (566.083-002Y20173614.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.083, RSMo, committed the class E felony of sexual misconduct involving a child, punishable upon conviction under Sections 566.083, 558.011, and 558.002, RSMo, in that, the defendant knowingly exposed defendant's genitals to [REDACTED] a child less than fifteen years of age, and did so for the purpose of arousing or gratifying the sexual desire of the defendant

The range of 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. 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.

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.

State vs. Samuel Schuler

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Arthur R. Bridgens
Arthur R. Bridgens (#68625)
Assistant Prosecuting Attorney
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Independence, MO 64050
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WITNESSES:

1. DET Jason Clancy, 223 N. Memorial Drive, Independence, MO 64050
2. DET Chad Cox, 223 N. Memorial Drive, Independence, MO 64050
3. [REDACTED]
4. [REDACTED]
5. PO Kindra Kitzenberger,

PROBABLE CAUSE STATEMENT

Date: 11/6/2018

Report #: 2018-77164

I, Chad Cox, 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 10/1/2018, at 1200, Samuel Schuler, (Race- White, Sex- Male, DOB- 08/02/48, Address-423 Stone Arch Dr, Independence, MO 64052, ██████████ committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 10/18/18 at about 2000 hours, Officer K. Kitzenberger #1558 was sent to Children's Mercy Hospital regarding a sex offense that occurred at 423 Stone Arch in Independence, Jackson County, MO. The victim's mother (██████████) stated that her friend, Sam Schuler, was watching the victim at his apartment. Schuler's apartment is at 423 Stone Arch Dr.

The victim (██████████ 06/30/09) was seen at the Child Protection Center on 11/01/18. The victim disclosed that she was at Sam Schuler's about a month ago and he gave her "pot" and a "blue kinky drink" that makes you want to do sexual things. They smoked the marijuana in a blue and silver smoking pipe. The victim advised that while at the house Schuler took pictures of her naked using a camera. The victim stated that the pictures came out of the camera right after he took them. She stated that he later put the pictures in a black box that was locked and it had several other photos in it. The victim advised that Schuler showed her several of the photos and they were of nude girls.

While at the apartment Schuler exposed his penis to her and put a "dildo" up his rectum. He then tried to get her to put the "dildo" up his rectum but she did not do it. The victim stated that the "dildo" was in his bedroom. Also in his bedroom was a picture of the Three Stooges on the wall and in the closet there is several "nasty magazines".

The victim further advised that two other juvenile victim's were present and Schuler took nude photos of them and also "humped them on their butts" while taking pictures. Schuler then gave them black tape and had them put it on their "boobs" and he took pictures of that.

The victim stated that her friend (██████████ 04/20/06) had been raped by Schuler in the past. ██████████ lives out of this jurisdiction but she had a forensic interview and advised that Schuler had raped licked her vagina and placed his penis in her vagina. She also stated that she watched the victim give Schuler oral sex and they both watched him masturbate several times. ██████████ did state that 2 months ago she and the victim were at Schuler's apartment in Independence and he came in the bedroom naked and masturbated in front of them.

I contacted ██████████ (victim's mother) in regard to the case. She advised that the victim has told her multiple times that Schuler made her touch his penis but he never put his penis in her vagina.

On 11/05/18 I contacted Sam Schuler in regard. Schuler talked about knowing the victim. He stated that she comes to his apartment a couple times a month. Schuler told me that he has known the victim's mom for several years. Schuler stated that he has never touched her in a sexual way and he has never taken nude photos of her. Schuler advised that he has never seen her naked but she has walked in on him using the restroom and she saw his penis.

I asked Schuler about giving the victim marijuana or alcohol and he denied doing that. He later stated that she probably stole alcohol and marijuana from him. Schular admitted to smoking marijuana from a small blue pipe that he keeps on his dresser.

We again talked about taking nude photos of children. Schuler was advised that the cameras have SD cards and computer chips in them that store digital photos. Schuler then stated that the victim and two other juveniles may have taken nude photos of each other with the camera but he does not know and he never caught them doing that. He did state that he caught the victim and another girl (████) under his covers doing lesbian acts in his bed. I asked him for more detail and he could not provide them. He also stated that he did not tell their parents.

Schuler stated that he did not know why these girls would make up the allegation but they are not true. Schuler stated that he would not pass a lie detector test because he gets nervous before taking them. He stated that in 2002 he failed a lie detector test about molesting his grand children.

I asked Schuler if he knew I was going to be talking to him and he told me that he figured I would be. He stated that two weeks ago two officers showed up at his house and wanted to talk to two juveniles and see if they were being sexually abused by Schuler.

Schuler had no further information for me.

Detective Chad Cox

/S/Chad Cox #1475

Print Name

Signature