

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**  
**AT**  
**INDEPENDENCE**

<b>POLICE NO. :</b>	17-2001
<b>PROSECUTOR NO. :</b>	095438465

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
<b>ZHIYANG JI</b>	)	
<b>8410 Maurer Rd. #1724,</b>	)	<b>CASE NO. 1716-CR</b>
<b>Shawnee Mission, KS - 66215</b>	)	<b>DIVISION 28</b>
<b>DOB: 07/12/1991</b>	)	
<b>Race/Sex: A/M;</b>	)	
<b>SSN: XXX-XX-XXXX</b>	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**

**Count I. Statutory Sodomy - 2nd Degree (566.064-001Y20171199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.064, RSMo, committed the Class D Felony of **STATUTORY SODOMY IN THE SECOND DEGREE**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or between February 8, 2017 and February 18, 2017, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of any person, knowingly had deviate sexual intercourse with [REDACTED] by placing defendant's mouth in [REDACTED] genitals, and at that time [REDACTED] was less than seventeen years of age and the defendant was twenty-one years of age or older.

The range punishment for a class D 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 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.

**State vs. Zhiyang Ji**

**Count II. Statutory Sodomy - 2nd Degree (566.064-001Y20171199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.064, RSMo, committed the Class D Felony of **STATUTORY SODOMY IN THE SECOND DEGREE**, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about February 8, 2017, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of any person, knowingly had deviate sexual intercourse with [REDACTED]. by placing [REDACTED]'s hand on defendant's genitals, and at that time [REDACTED] was less than seventeen years of age and the defendant was twenty-one years of age or older.

The range punishment for a class D 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 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.

**JEAN PETERS BAKER**

Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Kelsey L. Blackwell*

Kelsey L. Blackwell (#63713)  
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**State vs. Zhiyang Ji**

**WITNESSES:**

DET Erika Albin , 10 NE Tudor, Lees Summit, MO - 64086

[REDACTED]

SRO Rodger Bowers, 10 NE Tudor, Lee's Summit, MO - 64086

Det. Kevin Dibben, 10 NE Tudor, Lee's Summit, MO - 64086

[REDACTED]

Det. Shawn Rath, 10 NE Tudor, Lee's Summit, MO - 64086

Det. James Treacy, 10 NE Tudor, Lee's Summit, MO - 64086

# STATEMENT OF PROBABLE CAUSE

LSPD Complaint: 17-2001

Date: March 15, 2017

I, Detective Erika Albin, an investigator with the Lee's Summit, Missouri Department of Police, upon my oath, and under penalties of perjury, state as follows:

1. I have probable cause to believe that on 02-17-2017, at, 1901 NW Lowenstein Dr., Lee's Summit, Jackson County Missouri, 64082, Zhiyang Ji, A/M, 07-12-91, [REDACTED] committed one or more criminal offenses.
2. The facts supporting this belief are as follows: On 03-14-17, SRO Bowers was contacted by the Superintendent of Human Resources for the Lee's Summit R-7 District. He was advised that a teacher, Zhiyang Ji, at Lee's Summit North High School had been in a relationship with a student/victim [REDACTED]. Zhiyang admitted that to the Superintendent that he had oral sex with the victim.

Detective Rath contacted the victim, [REDACTED] to get a timeline of incidents involving him and the defendant. The victim stated that following: Victim started to talk to the defendant sometime in February 2017 about math assignments. In February, victim met the defendant and they went over math assignments at Starbucks. They communicated on "WeChat" about assignments. Soon, the "WeChat" conversations were more than school assignments. Victim was not sure of the actual date of when victim did "stuff" with the defendant outside of school. Victim knew that after school on Valentine's Day, the defendant took victim out to eat. Then they went to Target and then to Lowenstein Park, 1901 NW Lowenstein Dr. Lee's Summit, MO 64082. The defendant parked the car in the parking lot. Victim stated that there was touching of one another over clothes and oral sex was performed on the victim in the car.

On 02-18-17, the defendant picked victim up and took victim over to the defendant's residence, 8410 Maurer Rd #1724, Lenexa, Kansas 66215. While at the defendant's house, they watched videos of musicals and Thai shows. Victim advised that it went further with the defendant and they both were naked. The victim advised that victim was over at the defendant's house approximately 3-4 times.

Detective Erika Albin interviewed the defendant, Zhiyang Ji, in interview room #269 of the Criminal Investigations Unit. After he was read aloud his Miranda Rights, the defendant stated that he understood his rights and would be willing to talk. The defendant stated the following: He has been living in the United States for five years. In August of 2016, he started working with Lee's Summit R-7 School District as a Chinese teacher. He advised that he is in the United States on a work Visa from China. He started talking to the victim back in January 2017. The defendant was asked to join the Chinese Honor Society Instagram account. The victim sent him a friend request and started asking him "learning questions." Then, they started to talk on "WeChat" application. He advised that they communicate via "Wechat." He advised that the victim would stop by in the morning and talk to him. They also talked sometimes via SnapChat. Defendant stated that victim said victim had feelings for the defendant.

On 02-08-17, after school they went to Starbucks, 1130 NE Douglas St., Lee's Summit, MO 64086. He helped the victim [REDACTED] Math and Chinese. Then, he drove the victim to dinner at Mali Thai Bistro, 579 SE Melody Ln, Lee's Summit, MO 64063. During dinner, they talked about school and what the other students thought of him (Zhiyang). After dinner, he dropped victim off at Lee's Summit North High School, 901 NE Douglas St., Lee's Summit, MO 64086. He advised that they just hugged goodbye and the victim walked home.

On 02-14-17, after school they went to dinner at Mint Asian Cafe and Sushi, 1209 NE Rice Rd., Lee's Summit, Mo 64086. After dinner, they drove around Lee's Summit. During their car drive, they only held hands. They stopped at Target, 1850 NW Chipman Rd. and walked around. Then they drove over to Lowenstein Park, 1901 NW Lowenstein Dr. and parked the car in the parking lot. Zhiyang advised that they had consensual kissing with each other. He performed oral sex on the victim. He advised that the victim did not ejaculate. He also stated that the victim put victim's hands on his (Zhiyang) penis and gave him a hand job. He stated that he did not ejaculate. He then took the victim back to victim's house.

On 02-27-17, Lee's Summit North Assistant Principal Tim Collins confronted Zhiyang about rumors. He asked him if he was dating the victim. He advised that students saw them at Starbucks. He advised Tim that he was tutoring the victim on Chinese and Math. Assistant Principal Tim Collins advised the defendant to keep the tutoring at the school.

Zhiyang advised that he was taken back and upset about being questioned about his relationship with the victim. He decided to take a small break from seeing each other.

I asked Zhiyang if he ever sent any nude pictures of himself to the victim. He stated that he sent the victim a nude picture of himself from the waist down on Snapchat. The victim also sent him a nude picture of victim from the waist down on Snapchat.

Once our interview ended, Zhiyang was escorted back to detention. Zhiyang gave consent to download his Apple iPhone cell phone, a DNA buccal swab and a search of his 2014 Nissan Versa.

During our interview, defendant advised that he knew that it was wrong and illegal to be in a relationship with the victim.

Det. Erika Albin #0023  
Print Name (Detective)

/S/ Erika Albin #0023  
Signature (Detective)

**THE COURT FINDS PROBABLE CAUSE.**

MAR 15 2017

DATE

JUDGE

