

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	18-015934
PROSECUTOR NO. :	095444981
OCN:	an017391

STATE OF MISSOURI,)
)
) **PLAINTIFF,**)
vs.)
)
)
ROBERT L. BLUETT III)
) **CASE NO. 1816-CR**
) **DIVISION**
)
)
) **Indepondence, MO 64055**)
) **DOB: 05/15/1995**)
) **Race/Sex: B/M**)
)
)
) **DEFENDANT.**)

COMPLAINT

Count I. Sexual Contact W/ Student (566.086-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.086, RSMo, committed the class E felony of sexual contact with a student, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or between May 1, 2017 and November 30, 2017, in the County of Jackson, State of Missouri, the defendant was an employee of William Chrisman High School and had sexual contact with [REDACTED] a student of William Chrisman High School by insterting his penis in [REDACTED] mouth.

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.

State vs. Robert L. Bluett III

Count II. Sexual Contact W/ Student (566.086-001Y20173699.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.086, RSMo, committed the class E felony of sexual contact with a student, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about March 23, 2018, in the County of Jackson, State of Missouri, the defendant was an employee of William Chrisman High School and had sexual contact with [REDACTED] a student of William Chrisman High School by inserting his penis in [REDACTED] mouth.

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.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Kelly Collins
Kelly Collins (#68006)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO 64050
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WITNESSES:

1. PO Gary Baker, 223 N. Memorial Drive, Independence, MO 64050
2. [REDACTED]
3. PO Chad Cox, 223 N. Memorial Drive, Independence, MO 64050
4. [REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

PROBABLE CAUSE STATEMENT

Date: 4/12/2018

Report #: 2018-15934

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 August 2017-November 2017, at 2200 hours, Robert Bluett 3rd, (Race- Black, Sex- Male, DOB- 05/15/95, Address [REDACTED] Independence, MO, [REDACTED] committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 03/07/18, Sgt Young was contacted by Children's Division in regard to a sex offense at William Chrisman High School (1223 N. Noland Rd) involving a teacher and a student. CD wanted a copy of our report. Sgt Young was not able to locate a report so he contacted SRO Baker and asked him about this. He advised that he was never informed on the incident. Sgt Young told him to take a report on this incident.

SRO Baker contacted [REDACTED] (assistant principal) who advised him that a student [REDACTED] (04/19/01) had reported that her friend [REDACTED] (12/14/01/ victim1) had told her that she had been receiving inappropriate text from a teacher, Robert Bluett. [REDACTED] saw one of the text and it stated "What do you do when you are having sex with guys?".

I contacted victim #1 mother. She advised that her daughter is denying the allegations. I told her that due to the fact Bluett works for the school as a Para, a coach and formally as a substitute teacher I would conduct an interview.

On 04/10/18 I contacted Bluett and asked if he would come to the station for an interview. He agreed to meet with me on 04/11/18 at 1300 hours.

On 04/11/18 Bluett came to the police department and I escorted him to the interview room. Before starting the interview I explained to Bluett that he was not under arrest and he could leave at anytime. He stated that he understood.

Bluett at first denied anything inappropriate happened. I then told him that I sent a subpoena off for his FaceBook records and he told me that he did have some sexual conversations with victim #1. He stated that I would not find nude pictures of her but I would find one of her in a bathing suit. He stated that this was sent to him on Snapchat. He told me that they never meet up outside of school and that he did not even know that she went to his school until after the report was made to the school. Bluett had no further information for me at this time. I then escorted him to the lobby and he left the Police Station.

On 04/11/18 I contacted victim #1's mother in regard to the case. I told her what Bluett had stated. She then stated that her daughter had just advised her of the same information. Victim #1 told Victim #1's mother that she met Bluett at William Chrisman High School and he asked for her Facebook and Snapchat information. She stated that he later asked for nude photos and she sent them on snapchat.

Due to the information about the nude photos I issued a pick up order for Bluett. He was arrested and brought to the Police Department. Before starting the interview I read him the Miranda warning which he stated that he understood and he signed the form. It was later scanned into the report.

I told Bluett that I had learned more information from when he spoke last and that I knew that victim #1 had sent him nude photos. Bluett admitted that she did send him some nude photos through SnapChat. He stated that he saved those pictures in a fake calculator app but he deleted them when he was called in to the Admin Office for the school district.

Bluett told me that he has had sexual contact with two other students at William Chrisman. They were identified as [REDACTED] (11/09/99/ victim #2) and [REDACTED] (11/07/00/ victim #3). Bluett told me that both of these girls sent him multiple nude photos and or videos. Bluett knew them both from school.

I continued talking to Bluett and he told me that victim #2 did give him oral sex one time but it was not on school property. He stated that they were driving around and they stopped in his driveway at 1927 Ash in independence, Jackson County, MO. He stated that she gave him oral sex at that location. Bluett stated that he did not have any other physical contact with victim #2 or any other student. He told me that he thought it was around summer (2017) when this happened.

I contacted victim #2 in regard. She agreed to come to the station to talk to me. I explained to her that I was conducting an investigation with Robert Bluett and that he was the suspect. I told her that I had interviewed him in regard to having sexual contact with students. I then told her that her name came up in the investigation and I needed her to tell me what had happened. Victim #2 advised that she is a senior at William Chrisman and has attended there since her freshman year.

Victim #2 confirmed that she knew Bluett and that he had been her substitute teacher last year and at the beginning of this year at William Chrisman Hig School. She stated that they had been talking on Snapchat for awhile and sometime between the first day of school and her birthday, which is in November, she was at a friend's house and she got very intoxicated. She started arguing with someone at the house and she wanted to leave so she snapchatted Bluett. Bluett came and picked her up and they drove around and ended up in his driveway. She stated that she ended up giving him oral sex in the driveway.

Victim #2 stated that he did not ejaculate and it ended because she told him that she needed to go to the bathroom so he took her home. I asked her how intoxicated she was and she told me that she has not drank since this incident. I asked her if she can remember everything from that night and she stated that she could and that she never loses her memory when she drinks. I asked if Bluett was drunk and she told me that she does not think he was.

Victim #2 advised that the oral sex was consensual. She stated that after this incident she has sent him several nude photos on Snapchat. I asked if they have ever had any type of contact at school and she stated that they say hello to each other and sometimes she will ask him for food. She stated that they do not have any other contact. Victim #2 did not remember the last time she sent Bluett nude pictures but that it had been a while.

On 04/12/18 I contacted Victim #3 ([REDACTED] 11/07/00) in regard to this case. She stated that she friended Bluett on Snapchat because she had questions for him about being a teacher and working with special needs kids. She stated that she had seen him around William Chrisman High School and that she knew he was a teacher and a coach. Victim #3 told me that she sent nude photos to Bluett on about 5 different occasions. She stated that this started in late December of 2017 and the last time she sent him nude photos was around April 1st 2018. Victim #3 also stated that Bluett sent her a picture of his penis one time on Snapchat.

She stated that on March 23rd 2018 they met in a closed bathroom at William Chrisman High School on the main level. She stated that they went in the restroom and she gave Bluett oral sex until he

ejaculated in her mouth. She stated that this lasted about 20 minutes. Victim #3 stated that this was the only time that they had sexual contact. I asked her if she was forced to do this and she stated that it was consensual.

Victim #3 advised that Bluett knew that she was 17 years old and that they had talked about it and she specifically told him her age.

Detective Chad Cox

/S/Chad Cox #1475

Print Name

Signature