

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

POLICE NO. :	2017-02626
PROSECUTOR NO. :	095438993

STATE OF MISSOURI,)	
)	PLAINTIFF,
vs.)	
JAMES "RUSSELL" GREEN JR.)	
3704 NW Anchor Court,)	CASE NO. 1716-CR
Blue Springs, MO -)	DIVISION
DOB: 11/03/1964)	
Race/Sex: W/M;)	
SSN: XXX-XX-XXXX)	
)	DEFENDANT.

COMPLAINT

Count I. Statutory Sodomy 2nd Degree (566.064-001Y19951112.0)

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 C felony of statutory sodomy in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between September 1, 2005 and October 31, 2005, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with [REDACTED] by putting his penis into the anus of [REDACTED] and at that time [REDACTED] was less than seventeen years old and the defendant was twenty-one years of age or older.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count II. Statutory Sodomy 2nd Degree (566.064-001Y19951112.0)

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,

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committed the class C felony of statutory sodomy in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between September 1, 2005 and October 31, 2005, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with [REDACTED]. by putting his penis into the anus of [REDACTED]. and at that time [REDACTED] was less than seventeen years old and the defendant was twenty-one years of age or older.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count III. Statutory Sodomy 2nd Degree (566.064-001Y19951112.0)

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 C felony of statutory sodomy in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between September 1, 2005 and October 31, 2005, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with [REDACTED] by putting his penis into the anus of [REDACTED]. and at that time [REDACTED]. was less than seventeen years old and the defendant was twenty-one years of age or older.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count IV. Statutory Sodomy 2nd Degree (566.064-001Y19951112.0)

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,

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committed the class C felony of statutory sodomy in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between September 1, 2005 and October 31, 2005, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with [REDACTED]. by putting his penis into the anus of [REDACTED]. and at that time [REDACTED]. was less than seventeen years old and the defendant was twenty-one years of age or older.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count V. Statutory Sodomy 2nd Degree (566.064-001Y19951112.0)

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 C felony of statutory sodomy in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between September 1, 2005 and October 31, 2005, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with [REDACTED] by putting his penis into the mouth of [REDACTED]. and at that time [REDACTED]. was less than seventeen years old and the defendant was twenty-one years of age or older.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

Count VI. Statutory Sodomy 2nd Degree (566.064-001Y19951112.0)

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 C felony of statutory sodomy in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or between September 1,

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2005 and October 31, 2005, in the County of Jackson, State of Missouri, the defendant had deviate sexual intercourse with [REDACTED] by putting [REDACTED] s penis into his mouth. and at that time [REDACTED] was less than seventeen years old and the defendant was twenty-one years of age or older.

The range punishment for a class C 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 five thousand dollars (\$5,000); 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 up to a maximum of twenty thousand dollars (\$20,000).

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/ Devin M. Ledom
Devin M. Ledom (#44894)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050
(816) 881-4583
dledom@jacksongov.org

WITNESSES:

DET David Albers , 1125 Locust, Kansas City, MO - 64106

[REDACTED]
DET Martin Kreissler , 1100 SW Smith, Blue Springs, MO - 64015

PO Paula Pickett , 1100 SW Smith, Blue Springs, MO - 64015

STATEMENT OF PROBABLE CAUSE

DATE:	04/15/2017	Blue Springs Police Case Number	2017-02626
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I **R. Martin Kreissler** a police officer with the **Blue Springs 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 **during the time frame of September and October 2005, at 3704 N.W. Anchor Court, in Blue Springs, Jackson County, Missouri a James "Russell" Green Jr. a white male, date of birth 11/03/1964, [REDACTED], Address of 3704 N.W. Anchor Court, in Blue Springs, Jackson County, Missouri,** committed one or more criminal offenses.

2.) That the facts supporting this belief are as follows:

On **04/06/2017**, a "now" 27 year old male victim reported to Blue Springs Missouri Police Department Officer **Paula Pickett** the victim was sexually assaulted when the victim was **16 years old** by a then Blue Springs South High School teacher and swim coach, whom the victim knew as **Russell Green**. The victim reported the assaults took place at Russell Green's home which was located north of I-70, across from an Elementary school in Blue Springs.

Blue Springs Missouri Police Departments Special Victim's Detective **R. Martin Kreissler** was assigned to investigate this case. On **04/14/2017**, at 6:30 am, Detective Kreissler spoke in person with that victim. The victim told Detective Kreissler, Russell Green and a then **15 year old** victim met in **2005-2006**, via a chat room when the victim was a junior in Smithville Missouri high school. The victim said they "chatted" and would become friends.

The victim told Detective Kreissler Russell Green first touched the victim when Russell Green bought the victim a pair of "Nike Shocks" tennis shoes and drove to Smithville at 10:30-11:00 pm, to give the victim those tennis shoes. Russell Green was parked in front of the victim's Smithville home, the victim's parents were asleep in the house, and gave the victim the Nike tennis shoes. The victim said when Russell Green reached his hand out to give the victim the shoes Russell Green rubbed the victim's "genitals", with his hand, on top of the victim's clothes. This startled the victim, and Russell Green asked the victim if the victim was "nervous" telling the victim the victim would get "use to it". The victim "back off" from the car because the victim did not "want that".

The victim said Russell Green bought the victim a "camera" for the victim's computer. The victim said eventually Russell Green began sending the victim pictures of his "genitals" (penis). The victim sent Russell Green a picture of the victim's penis, which lead to Russell Green sending the victim via the computer videos of Russell Green "masterbating". The victim would eventually send Russell Green a video of the victim masterbating. The victim said Russell Green did ask the victim how old the victim was, a 15 years old, but the victim didn't ask Russell Green's age but knew he was an older person. Russell Green would later buy the victim other gifts such as a "Razor" cell phone and a car.

The victim talked about Russell Green hiring the then 16 year old victim to do "landscaping" at Russell Green's house. This was a reason that justified the victim coming over to "hang out" with Russell Green. The victim mowed Russell Green's yard and filled in a small pond that was in the backyard.

The victim gave Detective Kreissler an address of "3704 N.W. Anchor Court, Blue Springs, Missouri", which the victim discovered via Google maps. The victim was able to describe the inside of Russell Green's house to Detective Kreissler. The victim said in the basement is a "wrap around couch", dark in color, plus another "good size" love seat. The victim said there was a "big screen" maybe "50" TV, an older one with the "projection" screen type. The victim said in the basement towards the back door, is the bathroom. The victim talked about "mini helmets" and "signed" baseballs, a lot of "sports memorabilia" display in the basement but it was not just one particular team logo.

The victim told Detective Kreissler it was in the basement where they first had "intercourse". Russell Green "penetrated" the victim, the victim never penetrated Russell Green. The victim told Detective Kreissler this happened four different times, on four different days when the victim was **16 years old**. The victim talked about the first time this happened the victim was sitting on the love seat, in the basement when Russell Green got on his knees and started touching the victim. The victim told Russell Green the victim was not going to do anything. The victim was still reluctant but placed a pillow over the victims face as Russell Green continued his advance. The victim said Russell Green pulled the victim's "pants down" and put the victim's penis in Russell Green's mouth. Russell Green took the victim's hand and placed it on Russell Green's penis. Russell Green would then take the victim's penis and place it on his own penis and rubbed them together at the same time. The victim said Russell Green would stop that action, turned the victim around bending the victim over the loveseat, with the victim's upper body on the loveseat. The victim said Russell Green would then "lube" up his penis and "penetrate" the victim. The victim said this would end with Russell Green "cumming inside of me". The victim would get up, go to the bathroom, and sit on the toilet". The victim told Detective Kreissler after each time Russell Green penetrated the victim's "ass" it bled, hurt, and the victim would sit on the toilet "forever". The victim said when the blood came out of the victim's ass, Russell Green's "cum" came out also.

The victim talked about Russell Green teaching the victim to drive Russell Green's car a "5 speed CRV". While they were in Russell Green's CRV, in the parking lot of the "Independence Mall" Russell Green touched the victim on the victim penis, on top of clothes. The victim talked about having to put the victim's mouth on Russell Green's penis a couple of times. The victim decided to stop the relationship with Russell Green as the victim got older. The victim returned the Razor phone to Russell Green and ignore Russell Green attempts to speak with the victim.

The victim told Detective Kreissler Russell Green messaged the victim using Facebook a few years using the alias "**Matt Black**". The victim communicated with Russell Green via messenger for approximately a year and a half until the victim told Russell Green to leave the victim alone. The victim had to somewhat threaten harm to Russell Green to get him to leave the victim alone.

On **04/13/2017**, Detective Kreissler spoke with Kansas City Missouri Police Detective David Albers who is currently assigned to the FBI's Cyber Crimes Task Force regarding an investigation he had just begun involving "Russell Green" and a **16 year old victim**. Detective Albers had discovered through his investigation Russell Green who was currently a middle school teacher and swim coach for the North Kansas City School District, was sending and receiving photographs of the 16 year old victim via the internet.

On **4/14/2017**, the 16 year old victim completed a forensic interview at the Synergy Child Advocacy Center during which time the 16 year old victim stated around **September 2016**, 16 year old victim created an account on a social media account with a photo of his face. Shortly thereafter, the 16 year old victim was contacted by an unknown male claiming to be around 16 years old. The photos

associated with the account appeared to be consistent with a 16 year old male. Two days later, the unknown male advised the 16 year old victim that the unknown male knew who the 16 year old victim was from the past. The unknown male then slowly identified himself as his former computer tech teacher, Russell Green. The communication between Russell Green and the 16 year old victim continued on the social media site and through phone texts.

The last communication the 16 year old victim received from Russell Green was on **4/12/2017**. Detective Albers learned that during the several months of communication, Russell Green frequently turned the conversations to be sexual in nature. Russell Green requested names of gay classmates and suggested activity like having a “threesome” with any of them. Russell Green ordered sexy underwear and shirts via Amazon and shipped it to the 16 year old victim’s address. Russell Green requested photos of the 16 year old victim wearing the under wear. The 16 year old victim attempted to divert the request at first, but eventually gave into the requests sending multiple photos to Russell Green. Russell Green sent the 16 year old victim images of Green’s penis and buttocks. The walls in the background in the pictures appeared to be beige in color. One of the photos captured what appeared to be a small black laptop or tablet on a stand with a key board. Russell Green talked about his concern of getting in trouble if anybody else discovered what was going on between them.

Further investigation by Detective Albers revealed the following: the Amazon account indicated there was a MasterCard credit card on file ending in 3699. The billing address was set as 3704 NW Anchor Court, Blue Springs, MO (Russell Green’s known residence) and the shipping address was the 16 year old victim’s address. Some of the underwear descriptions delivered were listed as Men’s Sexy Model G-string Double Thong Underwear and Men’s Thin and Smooth Underwear Hollowed Straps. A phone number listed on file for Russell Green was located on 16 year old victim’s cell phone. Public databases were searched using the information provided. Russell Green was identified as James Russell Green Jr., Date of birth: 11-3-1964, of 3704NW Anchor Court, Blue Springs, Jackson County, Missouri. Records showed Russell Green’s Missouri DOR address matched the same address. A check through the Water Records from 2005 showed that Green started obtaining water at the target residence in 2005 and was current.

On **04/14/2017**, Detective Albers submitted an application for a search warrant for Russell Green’s residence in Blue Springs, Jackson County, Missouri for various computers and electronic devices related to his investigation. On 04/14/2017, at 14:17 hours Jackson County Missouri Circuit Court Judge **Jennifer M. Phillips**, signed a search warrant authorizing the search of Russell Green’s residence in Blue Springs, Jackson County, Missouri. After the search warrant was received Blue Springs Missouri Police Department Special Operation Officers assisted Detective Albers and other FBI Task Force Detective’s in the execution of that search warrant.

Prior to the execution of the search warrant the Detective’s assigned to surveillance of Russell Green’s residence observed Russell Green leave the residence. Those officer’s followed Russell Green to a second job at the Royals Stadium in Kansas City, Missouri. Those same Detectives’ took Russell Green into Custody on a “24 hours Investigative Hold” related to both investigations and transported him to the Blue Springs Missouri Police Department where he was held until Detectives Albers and Kreissler could speak with him.

At approximately **6:15 pm**, Detectives Albers and Kreissler spoke with Russell Green in an upstairs interview room of the Blue Springs Missouri Police Department. Detective Albers read Russell Green his Miranda Rights and asked if he had any questions about those rights. Russell Green had a question about what “in custody” meant. Detective Albers explained the facts regarding being in

custody which satisfied Russell Green. Russell Green signed the Miranda Warning Form which Detective Albers read from and the interview continued.

Throughout the interview it was learned from Russell Green he had a relationships' with persons under the age of 18 years of age. Detective Kreissler asked Russell Green if he knew the Blue Springs victim and if he bought the victim a car. Once Russell Green heard the Blue Springs victim's name he said he did remember the victim and he "did" buy a "\$1000" car for the victim. Russell Green said the Blue Springs victim was doing landscaping work and other work for him, working off the cost of the car. Russell Green would confirm he also bought the Blue Springs victim a video camera for the victim's computer. Russell Green was asked about buying the Blue Springs victim tennis shoes and a cell phone, which he responded he did not recall.

Russell Green was asked about his physical relationship with the Blue Springs victim. Russell Green said the victim was "curious" about certain sexual things which included oral and anal sex. Russell Green said while in his own basement, on a couch, he perform "oral, sucking" of the Blue Springs victim's penis. Russell Green said the victim wanted to try "anal" sex which only lasted a short time because the Blue Springs victim did not like it. Russell Green said he was "giving", he put his penis in the victim's anus, who was the receiver. Russell Green said they did not use any protection and he believes he use some type of "lube-KY" on the victim's anus prior to having anal sexual intercourse. Russell Green said the Blue Springs victim was lying on the victim's back with the legs up in the air when he stuck his penis inside. Russell Green believes this was in 2005-2006, which would make the Blue Springs victim 16 or 17 years of age. Russell Green was aware of the Blue Springs victim's age.

Russell Green stated the Blue Springs victim may have sent him pictures of the penis but denied sending the victim any video of him masterbating. Russell Green admitted to touching the Blue Springs victim's penis, admitted the victim touched Russell Green's penis, and that he may have put both of their penises together touching each at the same time.

3.)

A. Detective Kreissler believes James Russell Green Jr. is a danger to the community or to any other person under the age of 18 years of age. James Russell Green Jr. admitted to Detectives' he has had sexual relationships with **2 victims** under the age of 18 year of age. James Russell Green Jr. admitted to Detectives in the capacity as a **Teacher** and or **Coach** he has used a camera to film young male victims under the age of 18 years of age in a "locker room" setting secretly at various schools he was employed at.

The facts contained herein are true. False statements made herein are punishable by law.

Detective Martin Kreissler
Printed Name


Signature

The Court Finds Probable Cause:

Date

Jackson County Missouri Judge