

Pike  
IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSOURI  
ASSOCIATE/CIRCUIT JUDGE DIVISION 1  
45<sup>th</sup> JUDICIAL CIRCUIT

**FILED**

DEC - 3 2012

CIRCUIT COURT  
PIKE COUNTY, MISSOURI

STATE OF MISSOURI,  
Plaintiff,

vs.

XIU HUI JIANG,  
Defendant.

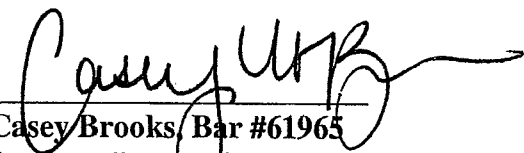
)  
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) Case No. 12L6-CR00665-02  
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**SUPPLEMENTAL ANSWER TO DEFENDANT'S REQUEST FOR DISCOVERY**

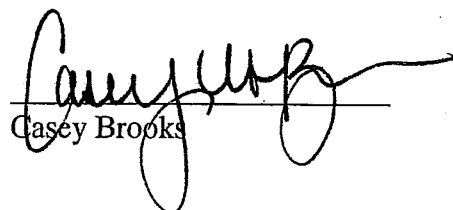
COMES NOW the State of Missouri, Plaintiff, by and through Casey Brooks, Assistant Prosecuting Attorney of Lincoln County, and for its answer to defendant's request for discovery, states as follows, to wit:

See attached DVD of photos of text messages from victim's cell phone, and recording of voicemail from Defendant to ~~XXXXXXXXXX~~

I cordially invite the defense counsel to review my file and reports at any reasonable time upon twenty-four hours notice.

  
Casey Brooks, Bar #61965  
Assistant Prosecuting Attorney  
P. O. Box 319  
Troy, MO 63379  
(636) 528-8571

A copy of the above and foregoing Supplemental Answer to Defendant's Request for Discovery was mailed this 30th day of November, 2012, by U. S. Mail, postage prepaid, to Paul D'Agrosa, Attorney at Law, at 7710 Carondelet, Saint Louis, MO 63105.

  
Casey Brooks

**FILED**

**IN THE CIRCUIT COURT OF PIKE COUNTY, MISSOURI**  
**CIRCUIT JUDGE DIVISION 1**  
**45<sup>th</sup> JUDICIAL CIRCUIT**

**JUN 20 2013**  
**CIRCUIT COURT**  
**PIKE COUNTY, MISSOURI**

**STATE OF MISSOURI,**  
**Plaintiff,**

**vs.**

**XIU HUI JIANG,**  
**Defendant.**

)  
)  
)  
) **Case No. 12L6-CR00665-02**  
)  
)  
)

**NOTICE OF DEPOSITIONS**


**TO:** Paul J. D'Agrosa  
7710 Carondelet, Suite 200  
St. Louis, MO 63105

**DATE AND HOUR:** Tuesday, July 16, 2013 at 3:00 p.m.

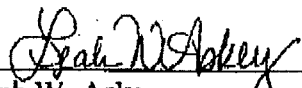
**LOCATION:** Archdiocese of St. Louis  
20 Archbishop May Drive  
St. Louis, MO 63119

**WITNESSES TO BE DEPOSED:** Archbishop Robert J. Carlson  
4510 Lindell Blvd.  
St. Louis, MO 63108

Deacon Philip R. Hengen  
2029 Old Bonhomme  
St. Louis, MO 63142

  
\_\_\_\_\_  
Leah W. Askcy, Bar #58710  
Prosecuting Attorney  
P.O. Box 319  
Troy, MO 63379  
(636) 528-8571

I hereby certify that a copy of the foregoing Notice of Depositions was served upon Paul J. D'Agrosa, Attorney at Law, by facsimile transmission this 20<sup>th</sup> day of June, 2013, at 2:45 p.m. to (314) 725-8443.

  
\_\_\_\_\_  
Leah W. Askcy



IN THE CIRCUIT COURT OF PIKE COUNTY, MISSOURI

FILED

JUL 10 2013

CIRCUIT COURT  
PIKE COUNTY, MISSOURI

Judge or Division: <u>1</u>	Case Number: <u>12116-CR000665-02</u>	
Petitioner: <u>State of Missouri</u>  vs.  Defendant: <u>Xiu Hui Jiang</u>	Person subpoenaed: <u>Rev. Robert J. Carlson</u>	Plaintiff's <u>Leah W. Askey</u>
	Address: <u>4510 Lindell Blvd. St. Louis, MO 63108</u>	Address: <u>Prosecuting Atty. Office POB 319, Troy, MO 63379</u>
	Telephone: <u>636-528-8571</u>	Telephone: <u>636-528-8571</u>
	Requesting Party: <input checked="" type="checkbox"/> Plt./Pet. Atty <input type="checkbox"/> Plt./Pet.  <input type="checkbox"/> Def/Resp. Atty <input type="checkbox"/> Def/Resp.	Respondent's Attorney: <u>Paul D'Agrasa</u>
Address: (Of Party Checked Above) <u>Prosecuting Atty Office POB 319, Troy, MO 63379</u>		Address: <u>7710 Carondelet Ste 200 St. Louis, MO 63105</u>
Telephone: <u>636-528-8571</u>		Telephone: <u>314-725-8019</u>

(Date File Stamp)

Subpoena

Order to Appear/Produce Documents/Give Depositions

The State of Missouri to Rev. Robert J. Carlson you are commanded:

☐ to contact \_\_\_\_\_ a \_\_\_\_\_ who will advise of time and place appearance is required.

☒ to appear at 20 Archbishop May Drive, St. Louis, MO 63119  
on Tuesday, July 16, 2013, at 3:00 pm

☐ to testify on behalf of: \_\_\_\_\_

☒ to give depositions.

☒ to bring the following The personnel file of Defendant, Xiu Hui Jiang and any and all documents relating to said defendant.



(Seal)

6/20/13

Date Issued

Jeri Harrelson  
Jeri Harrelson, Circuit Clerk

Return/Affidavit

I certify that I served this subpoena in ST. LOUIS County, Missouri by:

☒ delivering a copy to the person subpoenaed,

☐ reading a copy to the person subpoenaed on \_\_\_\_\_ (date).

☐ I tendered legal fees for travel expenses per Section 491.130 RSMo in the amount of \$ \_\_\_\_\_

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ ( \_\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

L. C. P. A.

M. Carlson

Person serving Subpoena



# IN THE CIRCUIT COURT OF PIKE COUNTY, MISSOURI

**FILED**

JUL 10 2013

CIRCUIT COURT  
PIKE COUNTY, MISSOURI

(Date File Stamp)

Judge or Division: <u>1</u>	Case Number: <u>12Lb-CROD665-02</u>	
Petitioner: <u>State of Missouri</u>	Person subpoenaed: <u>Deacon Philip R. Hengen</u>	Plaintiff's Attorney: <u>Leah W. Askey</u>
	Address: <u>2029 Old Bonhomme St. Louis, MO 63142</u>	Address: <u>Prosecuting Atty. Office POB 319, Troy, MO 63379</u> Telephone: <u>636-528-8571</u>
Defendant: <u>Xiu Hui Jiang</u>	Requesting Party: <input checked="" type="checkbox"/> Plt./Pet. Atty <input type="checkbox"/> Plt./Pet. <input type="checkbox"/> Def/Resp. Atty <input type="checkbox"/> Def/Resp.	Respondent's Attorney: <u>Paul D'Agrasa</u>
	Address: (Of Party Checked Above) <u>Prosecuting Atty Office POB 319, Troy, MO, 63379</u> Telephone: <u>636-528-8571</u>	Address: <u>7710 Carondelet, Ste 200 St. Louis, MO 63105</u> Telephone: <u>314-725-8019</u>

## Subpoena

### Order to Appear/Produce Documents/Give Depositions

- The State of Missouri to Deacon Philip R. Hengen you are commanded:
- ☐ to contact \_\_\_\_\_ a \_\_\_\_\_ who will advise of time and place appearance is required.
- ☒ to appear at 20 Archbishop May Drive, St. Louis, MO 63119 on Tuesday July 16, 2013 at 4:00 pm
- ☐ to testify on behalf of: \_\_\_\_\_
- ☒ to give depositions.
- ☒ to bring the following The personnel file of Defendant, Xiu Hui Jiang, and Any and all documents relating to said Defendant.



(Seal)  
6/20/13

Date Issued

Jeri Harrelson  
Jeri Harrelson, Circuit Clerk

## Return/Affidavit

- I certify that I served this subpoena in ST. LOUIS County, Missouri by:
- ☒ delivering a copy to the person subpoenaed,
- ☐ reading a copy to the person subpoenaed on \_\_\_\_\_ (date).
- ☐ I tendered legal fees for travel expenses per Section 491.130 RSMo in the amount of \$ \_\_\_\_\_

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Mileage \$ \_\_\_\_\_ (\_\_\_\_ miles @ \$ \_\_\_\_\_ per mile)

Total \$ \_\_\_\_\_

L.C.P.A.

M. Ouellet

Person serving Subpoena

INMATE NAME: Josep Jiang BOND AMOUNT: \$25,000  
Xinhui



LINCOLN COUNTY SHERIFF'S OFFICE  
JAIL DIVISION

CASH BOND ACKNOWLEDGEMENT

I, the undersigned, understand the following conditions apply if a cash bond is posted in any criminal case:

1. The receipt will name the defendant, as payer and the court will treat any money posted as the defendant's money.
2. By depositing this cash, you are relinquishing any claim you may have to the bond money.
3. In the event the defendant enters a guilty plea or is found guilty, all assessments against the defendant, such as fines, court cost, restitution, and various other fees, would be deducted from the cash bond before a refund is made.

I hereby acknowledge that I am posting the cash bond to secure the appearance of the defendant. I have read the foregoing notice and I understand the implications of posting any cash bond.

X Richard Stander 06-28-12  
Signature of person posting bond Date

# R E C E I P T

-----

45th Judicial Circuit

Receipt Number: 45PI45279

Date: 19-OCT-2012

Cashier: WATTSMAN

Payor: XIU HIU JIANG

ID: XIUJ\*6709

Address: 4510 LINDELL  
ST LOUIS, MO 63108

Court: 45th Judicial Circuit  
Case Type: CC Felony  
Location: Pike Circuit Division  
Case Judge: DAN DILDINE

Bond ID: 12PIBND275                      Bond Description: Check Bond  
Bond Amount on Deposit: 25,000.00

First Charge on Case: 2604700 - Endg Wlf Chd-1Dg-1st Off-SxCdt	Violation/Docket	Description	Amount
-----			
Case: 12L6-CR00665-02 - ST V XIU HUI JIANG			
Party: XIU HIU JIANG			

Check Bond	-25,000.00
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Total Fees:	0.00
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Total Payment:	25,000.00
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Balance Due:	0.00
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Next Scheduled Event:       
Judge for Event:  
Location of Event:

Receipt Text:

NOTE: Case information shown on receipt is current as of the date printed.

IN THE CIRCUIT COURT OF PIKE COUNTY, MISSOURI  
CIRCUIT JUDGE DIVISION 1  
45<sup>th</sup> JUDICIAL COURT

FILED

OCT 19 2012

CIRCUIT COURT  
PIKE COUNTY, MISSOURI

STATE OF MISSOURI, )  
Plaintiff, )  
 )  
vs. ) Case No. 12L6-CR00665-01  
 )  
XIU HUI JIANG , )  
Defendant. )

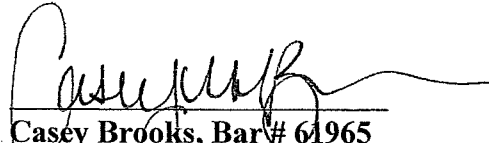
STATE'S BILL OF PARTICULARS

COMES NOW the State of Missouri, Plaintiff, by and through Casey Brooks, Assistant Prosecuting Attorney of Lincoln County, and for the State's Bill of Particulars, states to this Court as follows, to wit:

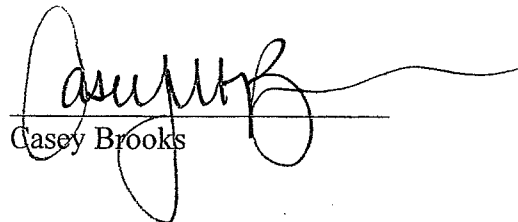
1. That the defendant is charged under Count II with the class C Felony of Victim Tampering under Section 575.270 RSMo., for events occurring on June 20, 2012 through June 21, 2012.
2. That Section 575.270 RSMo., states that a person commits the crime of "victim tampering" if, with the purpose to do so he prevents or dissuades or attempts to prevent or dissuade any person who has been a victim of any crime or a person who is acting on behalf of any such victim from making any report of such victimization to any peace officer, or state, local or federal law enforcement officer or prosecuting agency or to any judge.
3. That on June 20, 2012, the defendant, after admitting the allegations to ~~XXXXXX~~ and ~~XXXXXX~~, the victim's parents, the defendant offered to pay them any amount of money if they let the offense go unnoticed.
4. That on June 21, 2012, the ~~XXXXXX~~ received a text message from the defendant stating that had left a check for \$20,000 on their van.

5. That on June 21, 2012, [REDACTED] found an envelope on her van from the defendant with a check made out to them for \$20,000.

**WHEREAS**, the State of Missouri submits the above as and for her Bill of Particulars for Count II, as ordered by this Court.

  
Casey Brooks, Bar # 61965  
Assistant Prosecuting Attorney  
P. O. Box 319  
Troy, MO 63379  
(636) 528-8571

I hereby certify that a copy of the foregoing Memo in the above captioned action was served upon Paul D'Agrosa, Attorney at Law, by facsimile transmission this 16th day of October, 2012, at 12:05 pm to (314) 725-8443

  
Casey Brooks



IN THE CIRCUIT COURT OF PIKE COUNTY, MISSOURI  
CIRCUIT JUDGE DIVISION 100

STATE OF MISSOURI,  
Plaintiff,

vs.

XIU HUI JIANG,  
Defendant.

)  
)  
)  
) Case No. 12L6-CR00665-02  
)  
)  
)

**FILED**  
NOV - 5 2012  
CIRCUIT COURT  
PIKE COUNTY, MISSOURI

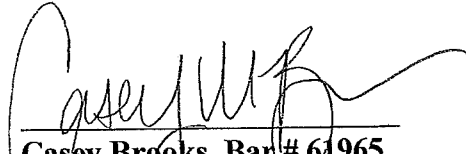
STATE'S BILL OF PARTICULARS FOR COUNT I

COMES NOW the State of Missouri, Plaintiff, by and through Casey Brooks, Assistant Prosecuting Attorney of Lincoln County, and for the State's Bill of Particulars for Count I, states to this Court as follows:

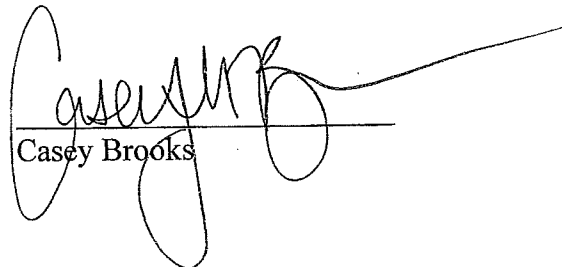
1. That the defendant is charged under Count I with the class C Felony of endangering the welfare of a child in the first degree under Section 568.045, RSMo., for events occurring on or about the month of June, 2012.
2. That Section 568.045.1(2) RSMo. states a person commits the crime of endangering the welfare of a child in the first degree if the person knowingly engages in sexual conduct with a person under the age of seventeen years over whom the person is a parent, guardian, or otherwise charged with the care and custody.
3. That during the month of June, 2012, the defendant engaged in sexual contact with [REDACTED] a person under the age of seventeen years old by touching her breasts.
4. That the defendant was a person who was otherwise charged with care and custody of the child in that he was [REDACTED]'s priest and close family friend.
5. Specifically, as [REDACTED]'s priest, the defendant was [REDACTED]'s confessor and confirmation sponsor.
6. As a family friend, the Defendant had a key to the family residence of [REDACTED], referred to himself as the brother of [REDACTED] and her siblings, frequently spent the night at their

residence, would spend time with the family outside of church, kept personal items at the residence of [REDACTED], and acted as a member of [REDACTED]'s household.

**WHEREAS**, the State of Missouri submits the above as and for her Bill of Particulars for Count I, as ordered by this Court.

  
Casey Brooks, Bar # 61965  
Assistant Prosecuting Attorney  
P. O. Box 319  
Troy, MO 63379  
(636) 528-8571

I hereby certify that a copy of the foregoing Motion in the above captioned action was served upon Paul D'Agrosa, Attorney at Law, by facsimile transmission this 2nd day of November, 2012, at 2:45pm to (314) 725-8443

  
Casey Brooks

STATE OF MISSOURI

)

COUNTY OF LINCOLN

)  
)

SS

FILED

2012 JUL 20 PM 12:00

IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSOURI  
CIRCUIT JUDGE DIVISION  
45<sup>th</sup> JUDICIAL CIRCUIT

GRACE SINCLAIR  
CIRCUIT COURT CLERK  
- LINCOLN COUNTY, MO.

STATE OF MISSOURI,  
Plaintiff,

)

)

)

vs.

)

Case No. 12L6-CR00665

)

)

Karpel 113121414

XIU HUI JIANG,  
Defendant.

)

)

INDICTMENT IN LIEU OF FELONY INFORMATION

**COUNT I**

The Prosecuting Attorney of the County of Lincoln, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 568.045, RSMo, committed the class C felony of endangering the welfare of a child in the first degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in that on or about June 23, 2012, in the County of Lincoln, State of Missouri, the defendant knowingly engaged in sexual contact with [REDACTED], a child less than seventeen years old, for whom the defendant was a person charged with the care of the child in that he was [REDACTED]'s priest, and close family friend.

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).

Missouri Charge Code: 26047990

**COUNT II**

The Prosecuting Attorney of the County of Lincoln, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 575.270, RSMo, committed the class C felony of victim tampering, punishable upon conviction under Sections 558.011 and 560.011, RSMo; in that on or about June 23, 2012, in the County of Lincoln, State of Missouri, the defendant with the purpose to prevent or dissuade the parents of [REDACTED], who were acting on behalf of [REDACTED], a victim of the crime of Endangering the Welfare of a Child in the First Degree, that was charged as a felony on or about June 28, 2012, from making any report of Child Endangerment in the First Degree to any peace officer, law enforcement officer, prosecuting agency, or judge.

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).

Missouri Charge Code: 29230990

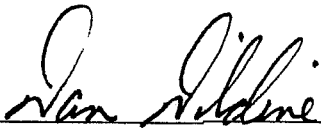
LEAH W. ASKEY  
PROSECUTING ATTORNEY OF  
LINCOLN COUNTY, MISSOURI

BY: 

**Casey Brooks Bar #61965**

Assistant Prosecuting Attorney

Dated: July 20, 2012



Judge Dan Dildine, Circuit Judge MB#27593

IN THE CIRCUIT COURT OF LINCOLN COUNTY  
STATE OF MISSOURI

FILED  
2012 AUG 10 AM 11:10

GRADE SINCLAIR  
CIRCUIT COURT CLERK  
LINCOLN COUNTY, MO.

STATE OF MISSOURI,

Plaintiff,

vs.

XIU HIU JIANG,

Defendant.

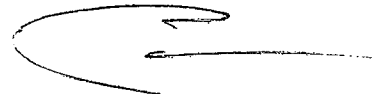
12L6-CR00665 - 01

DEFENDANT'S MOTION FOR CHANGE OF VENUE

Comes now Defendant Xiu Hui Jiang, by and through his counsel Paul J. D'Agrosa and pursuant to Supreme Court Rule 32.03 does hereby moves this Court to change venue in the above matter. Defendant suggests that St. Charles County is a convenient venue to all parties.

Respectfully submitted,

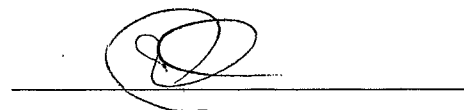
LAW OFFICES OF  
WOLFF & D'AGROSA



Paul J. D'Agrosa (#36966)  
7710 Carondelet, Suite 200  
Clayton, Mo. 63105  
(314) 725-8019  
(314) 725-8443 FAX  
Paul@wolffdagrosa.com

CERTIFICATE OF SERVICE

A copy of the foregoing was mailed this 9 day of August, 2012 to Miss Leah Askey, Prosecuting Attorney, P.O. Box 319, Troy, Missouri 63379.



IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSOURI  
ASSOCIATE/CIRCUIT JUDGE DIVISION 1  
45<sup>th</sup> JUDICIAL CIRCUIT

FILED  
2012 AUG 24 PM 2:26

BRAD SINCLAIR  
CIRCUIT COURT CLERK  
LINCOLN COUNTY, MO.

STATE OF MISSOURI,  
Plaintiff,

vs.

XIU HUI JIANG,  
Defendant.

)  
)  
)  
) Case No. 12L6-CR00665-01  
)  
)  
)

**MOTION TO ENDORSE ADDITIONAL WITNESSES**

COMES NOW the State of Missouri, Plaintiff, by and through Casey Brooks, Assistant  
Prosecuting Attorney of Lincoln County, and for its Motion to Endorse Additional Witnesses  
states that the additional witnesses that Plaintiff moves to endorse are:

Robert J Carlson  
20 Archbishop May Dr. Saint Louis, MO 63119  
Tina Donahey  
65 Business Park Drive Troy, MO 63379  
Phil Henegen  
20 Archbishop May Dr. Saint Louis, MO 63119  
Rachel McGuire  
P.O. Box 318 384 N. Lincoln Drive Troy, MO 63379  
Michael Merkel  
65 Business Park Drive Troy, MO 63379  
Becky Mueller  
65 Business Park Drive Troy, MO 63379  
Mindy Skaggs  
989 Heritage Parkway Wentzville, MO 63385

*Casey M Brooks*

**Casey Brooks, Bar #61965**  
Assistant Prosecuting Attorney  
P. O. Box 319  
Troy, MO 63379  
(636) 528-8571

*So ordered*  
*Dan Dillene*  
*10-2-12*

HASNT BEEN  
FILED YET

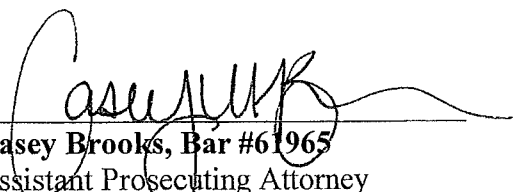
) ) ) ) ) ) )

**) Case No. 12L6-CR00665-01**

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).

Missouri Charge Code: 2923099.0



**Casey Brooks, Bar #61965**  
Assistant Prosecuting Attorney  
P. O. Box 319  
Troy, MO 63379  
(636) 528-8571

DATED: October 16, 2012

**WITNESSES FOR THE PROSECUTION**

Robert J Carlson Rev

Tina Donahey

Patrick Harney

Jerome Heavner

Regina L. Heavner

Philip R Hengen Deac

E.H. Juvenile

Rachel McGuire

Michael Merkel

Becky Mueller

Mindy Skaggs

**ALL PERSONS LISTED IN DISCOVERY**



IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSOURI  
CIRCUIT JUDGE DIVISION

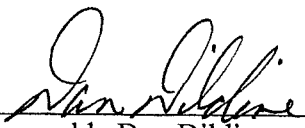
STATE OF MISSOURI,	)	
Plaintiff,	)	
	)	
vs.	)	Cause No. 12L6-CR00665-01
	)	
XIU HIU JIANG,	)	
Defendant.	)	

**ORDER**

On October 2, 2012, Defendant's Motion to Dismiss Count II of Indictment was called, argued, submitted, and taken under advisement. The Court now having had adequate opportunity to consider said motion, rules as follows:

Motion to Dismiss is denied. However, the State is ordered to provide Defendant a Bill of Particulars as to the conduct alleged to have attempted to prevent or dissuade the parents of ~~XXXX~~ from making a report to law enforcement. Said Bill of Particulars to be provided on or before October <sup>09</sup>~~30~~, 2012.

Change of venue is granted. Cause transferred to Pike County, Missouri.

  
\_\_\_\_\_  
Honorable Dan Dildine

Date: October 10, 2012

Counsel notified. 

IN THE CIRCUIT COURT OF LINCOLN COUNTY, MISSOURI  
CIRCUIT JUDGE DIVISION 1

STATE OF MISSOURI,                     )  
    Plaintiff,                             )  
  )  
vs.   ) Case No. 12L6-CR00665-01  
  )  
XIU HUI JIANG,                         )  
    Defendant.                         )

**ORDER TO AMEND THE TERMS OF THE BOND**

On 9-4-12, on the motion of the State of Missouri, the Court does  
hereby order defendant's bond amended to add a special condition that the defendant have no  
contact with the victim, ~~XXXX~~, or her family.

ENTER:

(SEAL)

  
\_\_\_\_\_  
JUDGE

On \_\_\_\_\_, copies of the above document were mailed to the following  
persons;

**12L6-CR00665-01 ST V XIU HUI JIANG****Security Level: 1 Public**

<b>Case Type:</b>	CC Felony	<b>Case Filing Date:</b>	20-Jul-2012
<b>Status:</b>	Change of Venue		
<b>Disposition:</b>	Change of Venue	<b>Disposition Date:</b>	10-Oct-2012
<b>OCN#:</b>	F4016002		
<b>Arresting Agency:</b>	MO0570000		

Release/Status Reason  
Change Date

Judge	DAN DILDINE (27593)
Defendant	<b>XIU HIU JIANG (XIUJ*6709)</b>
Attorney for Defendant	PAUL JOSEPH D'AGROSA(36966)
Prosecuting Attorney	LEAH WOMMACK ASKEY (58710)
Assistant Prosecuting Attorney	CASEY BROOKS(61965)

	Charge #	Charge Date	Charge Code	Charge Description
<b>Original Charge:</b>	1	23-Jun-2012	2604700	Endangering Welfare Of Child-1st Degree- 1st Offense -Sexual Conduct ( <b>Felony C RSMo : 568.045</b> )
<b>Disposition:</b>	10-Oct-2012	Change of Venue		
<b>Original Charge:</b>	2	23-Jun-2012	2923000	Tampering With a Victim/Witness or Attmppt Tampering w/Victim in a Felony Prosecution ( <b>Felony C RSMo : 575.270</b> )
<b>Disposition:</b>	10-Oct-2012	Change of Venue		

<u>Filing Date</u>	<u>Description</u>
20-Jul-2012	<b>Judge Assigned</b> <b>Public Grand Jury Indict filed</b>
24-Jul-2012	<b>Arraignment Scheduled</b> <b>Scheduled For:</b> 07-Aug-2012; 9:00 AM; DAN DILDINE; <b>Setting:</b> 0; LINCOLN COUNTY
07-Aug-2012	<b>Waiver of Formal Arraignment</b> WAIVER OF ARRAIGNMENT AS PER MEMO - MOTIONS TO BE FILED BY SEPTEMBER 4, 2012; HEARING ON MOTIONS ON OCTOBER 2, 2012 AT 9:00 A.M.; PRETRIAL SET ON NOVEMBER 6, 2012 AT 9:00 A.M.; JURY TRIAL SET ON NOVEMBER 28, 2012 AT 8:15 A.M. <b>Scheduled For:</b> 07-Aug-2012; 9:00 AM; DAN DILDINE; <b>Setting:</b> 0; LINCOLN COUNTY  <b>Entry of Appearance Filed</b> <b>Filed By:</b> PAUL J D'AGROSA  <b>Motion for Discovery</b> DEFENDANT'S MOTION FOR DISCOVERY AND INSPECTION <b>Filed By:</b> PAUL J D'AGROSA 28-Aug-2012 <b>Answers to Disclosure Filed</b>
10-Aug-2012	<b>Pre-trial Conference Scheduled</b> <b>Scheduled For:</b> 06-Nov-2012; 9:00 AM; DAN DILDINE; <b>Setting:</b> 0; LINCOLN COUNTY  <b>Jury Trial Scheduled</b>

Case continued from previous page.

**12L6-CR00665-01 ST V XIU HUI JIANG****Security Level: 1 Public****Scheduled For:** 28-Nov-2012; 8:15 AM; DAN DILDINE; **Setting:** 0; LINCOLN COUNTY**Motion for Change of Venue****Filed By:** PAUL J D'AGROSA**Motion to Dismiss**

MOTION TO DISMISS INDICTMENT IN LIEU OF FELONY INFORMATION

**Filed By:** PAUL J D'AGROSA**Motion to Dismiss**

MOTION TO DISMISS COUNT I OF INDICTMENT

MOTION TO DISMISS COUNT II OF INDICTMENT

**Filed By:** PAUL J D'AGROSA

14-Aug-2012

**Motion Hearing Scheduled****Scheduled For:** 02-Oct-2012; 9:00 AM; DAN DILDINE; **Setting:** 0; LINCOLN COUNTY

28-Aug-2012

**Motion Filed**

MOTION TO AMEND THE TERMS OF BOND

**Filed By:** LEAH WOMMACK ASKEY30-Aug-2012 **Response Filed****Answers to Disclosure Filed****Filed By:** CASEY BROOKS28-Aug-2012 **Supplemental Filing****Motion to Endorse****Filed By:** LEAH WOMMACK ASKEY**Supplemental Filing**

STATE'S SUPPLEMENTAL ANSWER TO DEFENDANT'S REQUEST FOR DISCOVERY,

**Filed By:** CASEY BROOKS

30-Aug-2012

**Motion Hearing Scheduled****Scheduled For:** 04-Sep-2012; 9:00 AM; DAN DILDINE; **Setting:** 0; LINCOLN COUNTY

MOTION TO AMEND TERMS OF BOND

**Response Filed**

DEFENDANT'S RESPONSE TO STATE'S MOTION TO AMEND TERMS OF BOND

**Filed By:** PAUL J D'AGROSA

04-Sep-2012

**Hearing Held****Scheduled For:** 04-Sep-2012; 9:00 AM; DAN DILDINE; **Setting:** 0; LINCOLN COUNTY

MOTION TO AMEND TERMS OF BOND

**Order**

ORDER TO AMEND THE TERMS OF BOND AS PER MEMO

07-Sep-2012

**Filing:**

SUPPLEMENTAL ANSWER TO DEFENDANT'S REQUEST FOR DISCOVERY

**Filed By:** CASEY BROOKS

10-Sep-2012

**Filing:**

SUPPLEMENTAL ANSWER TO DEFENDANT'S REQUEST FOR DISCOVERY

**Filed By:** CASEY BROOKS

Case continued from previous page.

12L6-CR00665-01 ST V XIU HUI JIANG

Security Level: 1 Public

02-Oct-2012 **Hearing Held**  
ORDER AS PER MEMO - CAUSE CALLED FOR MOTIONS; PARTIES APPEAR; DEFENDANT APPEARS IN PERSON. COURT TAKES CAUSE UNDER ADVISEMENT DEFENDANT'S MOTION TO DISMISS COUNT I AND DEF  
**Scheduled For:** 02-Oct-2012; 9:00 AM; DAN DILDINE; **Setting:** 0; LINCOLN COUNTY  
**Hearing/Trial Cancelled**  
**Scheduled For:** 06-Nov-2012; 9:00 AM; DAN DILDINE; **Setting:** 0; LINCOLN COUNTY  
**Hearing/Trial Cancelled**  
**Scheduled For:** 28-Nov-2012; 8:15 AM; DAN DILDINE; **Setting:** 0; LINCOLN COUNTY

10-Oct-2012 **Change of Venue**  
TRANSFERRED TO COUNTY - Pike  
**Order**  
ORDER DENYING MOTION TO DISMISS AS PER MEMO  
ORDER GRANTING CHANGE OF VENUE TO PIKE COUNTY MISSOURI

State of Missouri }  
County of Lincoln, } SS.

I, the undersigned, Clerk of the Circuit Court do hereby  
certify that above and foregoing to be a true copy of  
original Docket Sheet

as the same appears of record in my office.

IN TESTIMONY WHEREOF, I have hereunto set my  
hand and affixed the seal of said Court at office in Troy,  
this the 18<sup>th</sup> day of Oct, 20 12.

GRACE SINCLAIR, Circuit Clerk

By [Signature] D.E.

12L6-CR00665-02 ST V XIU HUI JIANG

Security Level: 1 Public

Case Type: CC Felony  
Status: Change of Venue Received  
Disposition:  
OCN#: F4016002  
Arresting Agency: MO0570000

Case Filing Date: 19-Oct-2012  
Disposition Date:

		<u>Release/Status</u>	<u>Reason</u>
		<u>Change Date</u>	
Judge	CHRIS KUNZA MENNEMEYER (46581)		
Judge	DAN DILDINE (27593)	31-Dec-2012	No Longer in Office/Position
Defendant	<b>XIU HIU JIANG (XIUJ*6709)</b>		
Attorney for Defendant	PAUL JOSEPH D'AGROSA(36966)		
Assistant Prosecuting Attorney	CASEY BROOKS (61965)		
Prosecuting Attorney	LEAH WOMMACK ASKEY (58710)		

	Charge #	Charge Date	Charge Code	Charge Description
Original Charge:	1	23-Jun-2012	2604700	Endangering Welfare Of Child-1st Degree- 1st Offense -Sexual Conduct ( <b>Felony C RSMo : 568.045</b> )
Original Charge:	2	23-Jun-2012	2923000	Tampering With a Victim/Witness or Attmpt Tampering w/Victim in a Felony Prosecution ( <b>Felony C RSMo : 575.270</b> )

<u>Filing Date</u>	<u>Description</u>
19-Oct-2012	<b>Change of Venue Received</b> Change of Venue received from Lincoln County Circuit Court. <b>Filing:</b> State's Bill of Particulars filed. <b>Filed By:</b> CASEY BROOKS
25-Oct-2012	<b>Notice</b> <b>Filed By:</b> CASEY BROOKS  <b>Criminal Motion Hearing Sched</b> <b>Scheduled For:</b> 13-Nov-2012; 9:00 AM; DAN DILDINE; <b>Setting:</b> 0; Pike Circuit Division
30-Oct-2012	<b>Order</b> Now on the 30th day of October, 2012, Defendant's Motion to Dismiss Count I is denied. However, the State is ordered to provide Defendant a Bill of Particulars as to the conduct and circumstances alleged to establish that Defendant was a person charged with the care of E.H. Said Bill of Particulars to be provided on or before November 14, 2012.
31-Oct-2012	<b>Memorandum Filed</b> Prosecuting Attorney withdraws its notice of setting motion hearing. <b>Filed By:</b> CASEY BROOKS  <b>Filing:</b> Exclusionary Dates filed.

Case continued from previous page.

**12L6-CR00665-02 ST V XIU HUI JIANG****Security Level: 1 Public****Filed By:** CASEY BROOKS**Hearing/Trial Cancelled****Scheduled For:** 13-Nov-2012; 9:00 AM; DAN DILDINE; **Setting:** 0; Pike Circuit Division**Filing:**

Exclusionary Dates filed.

**Filed By:** PAUL J D'AGROSA

05-Nov-2012

**Filing:**

State's Bill of Particulars for Count I filed.

**Filed By:** CASEY BROOKS

09-Nov-2012

**Judge/Clerk - Note**

Cause set for 2 day jury trial beginning March 7, 2013 at 8:15 a.m. All parties to appear at that time.

**Jury Trial Scheduled****Scheduled For:** 07-Mar-2013 ; 8:15 AM; CHRIS KUNZA MENNEMEYER; **Setting:** 0; Pike Circuit Division; **Length:** 2 Days

13-Nov-2012

**Supplemental Filing**

Supplemental Answer to Defendants Request for Discovery filed.

**Filed By:** CASEY BROOKS

03-Dec-2012

**Supplemental Filing**

Supplemental Answer to Defendant's Request for Discovery filed.

**Filed By:** CASEY BROOKS

31-Dec-2012

**Judge Assigned**

Incoming Judge assigned to replace outgoing Judge

09-Jan-2013

**Hearing/Trial Cancelled****Scheduled For:** 07-Mar-2013 ; 8:15 AM; CHRIS KUNZA MENNEMEYER; **Setting:** 0; Pike Circuit Division; **Length:** 2 Days**Hearing/Trial Cancelled****Scheduled For:** 08-Mar-2013 ; 8:15 AM; CHRIS KUNZA MENNEMEYER; **Setting:** 0; Pike Circuit Division; **Length:** 2 Days**Judge/Clerk - Note**

Jury trial scheduled for March 7 and 8, 2013 has been cancelled. Parties to submit exclusionary dates for the months of April, May, June and July, 2013. Please indicate on the notice if you are still requesting a jury trial and the number of days requested. Exclusionary dates to be received within ten days.

18-Jan-2013

**Filing:**

Exclusionary Dates filed.

**Filed By:** PAUL J D'AGROSA

22-Jan-2013

**Filing:**

Exclusionary dates filed.

**Filed By:** CASEY BROOKS

01-Feb-2013

**Jury Trial Scheduled****Scheduled For:** 10-Oct-2013 ; 8:15 AM; CHRIS KUNZA MENNEMEYER; **Setting:** 1; Pike Circuit Division; **Length:** 2 Days

12L6-CR00665

ST V JIANG XIUHUI

Security Level: 1 Public

**Case Type:** AC Felony  
**Status:** Casefile Tranf GrandJury Indmt  
**Disposition:** Casefile Tranf GrandJury Indmt  
**OCN#:** F4016002  
**Arresting Agency:** MO0570000

**Case Filing Date:** 28-Jun-2012  
**Disposition Date:** 20-Jul-2012

**Release/Status Reason**  
**Change Date**

Judge BEN BURKEMPER JR. (39489)  
 Defendant JIANG XIUHUI (XIUI\*6709)  
 Attorney for Defendant PAUL JOSEPH D'AGROSA(36966)  
 Assistant Prosecuting Attorney CASEY BROOKS (61965)

**Current Bond:** Bond-Cash Bond Posted Full Amt 05-Jul-2012

	Charge #	Charge Date	Charge Code	Charge Description
<b>Original Charge:</b>	1	23-Jun-2012	2604700	Endangering Welfare Of Child-1st Degree- 1st Offense -Sexual Conduct (Felony C RSMo : 568.045)
<b>Disposition:</b>	20-Jul-2012		Casefile Tranf GrandJury Indmt	

**Filing Date**      **Description**

28-Jun-2012      **Judge Assigned**  
                  **Complaint Filed**  
                  PROBABLE CAUSE STATEMENT, FILED. WARRANT ORDERED ISSUED. BOND AUTHORIZED \$25000.00 CASH ONLY  
                  **Filed By:** CASEY BROOKS  
                  **Warrant Issued**  
                  Document ID: 12-L6ARW-539, for XIUHUI, JIANG. , Bond Amount: 25,000.00, Bond Text: CASH ONLY  
                  **Service/Attempt Date:** 29-Jun-2012  
                  **Bond Amount:** 25,000.00; **Cash Bond Amount:** 25,000.00; **Bond Text:** CASH ONLY

29-Jun-2012      **Warrant Served**  
                  Document ID - 12-L6ARW-539; Served To - XIUHUI, JIANG; Server - SO LINCOLN COUNTY-TROY; Served Date - 29-JUN-12; Served Time - 00:00:00; Service Type - Sheriff Department; Reason Description - Served

05-Jul-2012      **Bond-Cash Bond Posted Full Amt**  
                  **Bond ID:** 12L6BND487; **Amount Posted:** \$25,000.00; **Posted By:** XIUHUI, JIANG

06-Jul-2012      **Bond Appearance Hrng Sched**  
                  **Scheduled For:** 18-Jul-2012; 8:30 AM; BEN BURKEMPER JR.; **Setting:** 0; LINCOLN COUNTY ARRAIGNMENT

18-Jul-2012      **Waiver of Formal Arraignment**  
                  **Scheduled For:** 18-Jul-2012; 8:30 AM; BEN BURKEMPER JR.; **Setting:** 0; LINCOLN COUNTY ARRAIGNMENT  
                  **Preliminary Hearing Scheduled**



Report: CZR0026

45TH JUDICIAL CIRCUIT  
LINCOLN COUNTY  
CIRCUIT COURT DOCKET SHEET

Date: 24-Jul-2012  
Time: 12:51:47PM  
Page: 2

Case continued from previous page.

**12L6-CR00665**

**ST V JIANG XIUHUI**

**Security Level: 1 Public**

**Scheduled For:** 05-Sep-2012; 8:30 AM; BEN BURKEMPER JR.; **Setting:** 0; LINCOLN COUNTY

20-Jul-2012

**Casefile Tranf GrandJury Indmt**

24-Jul-2012

**Hearing/Trial Cancelled**

**Scheduled For:** 05-Sep-2012; 8:30 AM; BEN BURKEMPER JR.; **Setting:** 0; LINCOLN COUNTY

Case continued from previous page.

**12L6-CR00665-02 ST V XIU HUI JIANG****Security Level: 1 Public**

26-Feb-2013 **Motion for Continuance**  
**Filed By:** CASEY BROOKS  
11-Mar-2013 **Order for Continuance**

11-Mar-2013 **Order for Continuance**  
State's Request for continuance granted. Cause re-set to July 18-19, 2013 at 8:30 a.m. for jury trial. All parties to appear at that time.  
**Hearing Continued/Rescheduled**  
**Hearing Continued From:** 10-Oct-2013; 8:15 AM  
**Jury Trial Scheduled**  
**Scheduled For:** 18-Jul-2013 ; 8:30 AM; CHRIS KUNZA MENNEMEYER; **Setting:** 0; Pike Circuit Division; **Length:** 2 Days

11-Jun-2013 **Notice to Take Deposition**  
**Filed By:** LEAH WOMMACK ASKEY

20-Jun-2013 **Motion for Continuance**  
**Filed By:** LEAH WOMMACK ASKEY  
**Filing:**  
Exclusionary dates filed.  
**Filed By:** LEAH WOMMACK ASKEY  
**Notice to Take Deposition**  
**Filed By:** LEAH WOMMACK ASKEY

21-Jun-2013 **Filing:**  
Exclusionary dates filed.  
**Filed By:** PAUL J D'AGROSA

25-Jun-2013 **Order for Continuance**  
State's Request for Continuance granted. Jury trial continued to October 1-2, 2013 at 8:15 a.m. All parties to appear at that time.  
**Hearing Continued/Rescheduled**  
**Hearing Continued From:** 18-Jul-2013; 8:30 AM  
**Jury Trial Scheduled**  
**Scheduled For:** 01-Oct-2013 ; 8:15 AM; CHRIS KUNZA MENNEMEYER; **Setting:** 0; Pike Circuit Division; **Length:** 2 Days