

IN THE DISTRICT COURT OF POTTAWATOMIE COUNTY
SECOND JUDICIAL DISTRICT OF KANSAS

STATE OF KANSAS,) Plaintiff,
)
v.) Case No. 2021-CR-000135
)
ZACHARIAH THOMAS) Defendant.
BAYLESS
a/k/a

8629 Eagles Landin Cir
Manhattan, KS 66502

DL: KS, K03988255 Race/Sex: White / male Height: 505 Weight: 140 Eye Color: Brown Hair Color: Brown
KDR Transaction Number: 307522100289

COMPLAINT/INFORMATION

Sherri Schuck, #20509, County Attorney, the undersigned, of lawful age, being first duly sworn on oath, for complaint against the above shown defendant, in the name and by the authority on behalf of the State of Kansas, gives the Court to understand and be informed:

COUNT 1: That on or between the 30th day of November, 2020 and the 4th day of December 2020, in Pottawatomie County, Kansas, Zachariah Thomas Bayless, then and there being present did unlawfully and feloniously promoted any performance that includes sexually explicit conduct by a child under 18 years of age, knowing the character and content of the performance at such time that Zachariah Thomas Bayless was 18 years of age or older and the child was under 14 years of age. In violation of K.S.A. 2020 Supp. 21-5510(a)(4) & (b)(2), **Sexual Exploitation of a Child, an off-grid person felony.**

COUNT 2: That on or about the 13th day of May, 2021, in Pottawatomie County, Kansas, Zachariah Thomas Bayless, then and there being present did unlawfully and feloniously possess a photograph, film, video picture, digital or computer-generated image or picture, whether made or produced by electronic or mechanical or other means which visually depicts a child under 18 years of age who is shown or heard engaging in sexually explicit conduct, with the intent to arouse or satisfy the sexual desires or appeal to the prurient interest of the defendant, the child, or another. In violation of K.S.A. 2020 Supp. 21-5510(a)(2)(b)(1)(A), **Sexual Exploitation of a Child, a severity level 5 person felony.**

WITNESSES: Evidence Custodian, KBI Laboratory Representative, Records Custodian, Pottawatomie County Dispatch Representative, Intoxilyzer Records Custodian, Megan Bayless, Randi Clifford, Katharine Jackson, Bradley Rose, Rob Gordon, Eric Green, Darin LaBarge, Tanner Monroe.

NOTICE: Information about the Diversion Program is available through the Pottawatomie County Attorney's Office.

/s/ Sherri Schuck, #20509

Sherri Schuck, #20509

County Attorney

108 North 1st Street

Westmoreland, KS 66549

T: (785) 457-3511 F: (785) 457-3896

schuck@pottcountyatty.org

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF Pottawatomie County)

SHERRI SCHUCK, #20509, COUNTY ATTORNEY being first duly sworn upon oath, states that I am the County/District Attorney or designee for the County named above, that I have read the foregoing COMPLAINT/INFORMATION and that I believe the statements contained therein are true to the best of my own knowledge.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on Wednesday, June 2, 2021.

/s/ Sherri Schuck, #20509

Sherri Schuck, #20509

County Attorney

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