

**Cuyahoga County Court of Common Pleas
Criminal Court Division**

State of Ohio, vs. Jiansen Liang,		Plaintiff Defendant	A True Bill Indictment For Aggravated Murder - UF §2903.01(A) 7 Additional Count(s)
Dates of Offense (on or about) July 27, 2017	The Term Of May of 2017		Case Number 619903-17-CR

The State of Ohio, }
Cuyahoga County } **SS.**

Count One	Aggravated Murder - UF §2903.01(A)
Defendants	Jiansen Liang
Date of Offense	On or about July 27, 2017
<p><i>The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant(s), on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully</i></p> <p>did purposely, and with prior calculation and design, cause the death of Qihong Chen.</p> <p>The State of Ohio reserves the right to seek a superseding indictment containing the appropriate R.C. 2929.04(A) Aggravating Circumstance(s)/Specification(s).</p> <p><i>The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.</i></p>	



Foreperson of the Grand Jury



Prosecuting Attorney

Count Two **Aggravated Murder - UF**
 §2903.01(B)

Defendants Jiansen Liang

Date of Offense On or about July 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did purposely cause the death of, Qihong Chen while committing, or attempting to commit, or while fleeing immediately after committing or attempting to commit the offense of Aggravated Burglary and/or Kidnapping.

The State of Ohio reserves the right to seek a superseding indictment containing the appropriate R.C. 2929.04(A) Aggravating Circumstance(s)/Specification(s).

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Three **Aggravated Burglary - F1**
 §2911.11(A)(1)

Defendants Jiansen Liang

Date of Offense On or about July 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, stealth, or deception, trespass, as defined in section 2911.21(A)(1) of the Revised Code, in an occupied structure or in a separately secured or separately occupied portion of an occupied structure, when Qihong Chen, a person other than the accomplice, was present, with purpose to commit in the structure or in the separately secured or separately occupied portion of the structure a criminal offense, to wit: Aggravated Murder and/or Felonious Assault, in violation of R.C. 2903.01 (A) and/or R.C. 2903.11(A)(1)., and the offender recklessly inflicted, or attempted or threatened to inflict physical harm on Qihong Chen.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Four **Kidnapping - F1**
 §2905.01(A)(3)

Defendants Jiansen Liang

Date of Offense On or about July 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did, by force, threat, or deception, purposely remove Qihong Chen from the place where she was found or restrain the liberty of her for the purpose of terrorizing or inflicting serious physical harm upon Qihong Chen or another.

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count Five **Murder - UF**
 §2903.02(B)
Defendants Jiansen Liang
Date of Offense On or about July 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did cause the death of Qihong Chen, as a proximate result of the offender committing or attempting to commit an offense of violence that is a felony of the first or second degree, to wit: Felonious Assault in violation of R.C. 2903.11(A)(1), in violation of Section 2903.02 of the Revised Code.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Six **Felonious Assault - F2**
 §2903.11(A)(1)
Defendants Jiansen Liang
Date of Offense On or about July 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did knowingly cause serious physical harm to Qihong Chen.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Seven **Felonious Assault - F2**
 §2903.11(A)(2)
Defendants Jiansen Liang
Date of Offense On or about July 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
 did knowingly cause or attempt to cause physical harm to Qihong Chen by means of a deadly weapon or dangerous ordnance, to wit: Meat Cleaver and/or Knife,.
The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count Eight **Gross Abuse Of A Corpse - F5**
 §2927.01(B)
Defendants Jiansen Liang
Date of Offense On or about July 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully
did, except as authorized by law, treat a human corpse in a way that would outrage reasonable
community sensibilities.
*The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of
Ohio.*



Foreperson of the Grand Jury



Prosecuting Attorney