	FILED		
DIVISION 1			
	09-Jul-2024	12:39	
CIRCUIT COURT OF JACKSON COUNTY, MO BY DCA			

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI AT KANSAS CITY

POLICE NO.: KC24039291

PROS	SECUTOR NO.:	095479	713
	OCN:		
STATE OF MISSOURI	[,)
	PLAIN	NTIFF,)
VS.)
)
RICHARD GERARD F	IARRIS JR.)
8901 WORNALL RD) CASE NO. 2416-CR
Kansas City, MO 64114) DIVISION
DOB:)
Race/Sex: B/M)
S.S.N.:)
	DEFENI	DANT.)
	COMD	T A TNIT	Г

COMPLAINT WARRANT REQUESTED

Count I. Murder 2nd Degree (565.021-001Y20200903.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about June 17, 2024, in the County of Jackson, State of Missouri, the defendant knowingly or with the purpose of causing serious physical injury to Confidential Victim, caused the death of Confidential Victim by shooting her, and defendant is further given notice that should the state submit murder in the second degree - felony under Section 565.021.1(2), it will be based on the death of Confidential Victim as a result of the perpetration of the class A felony of unlawful use of a weapon under Section 571.030.1(9), RSMo, committed by defendant.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The class A felony carries the punishment range of from 10 to 30 years, or life imprisonment in the Department of Corrections.

Count II. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about June 17, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the 2nd Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the 2nd Degree by, with and through, the knowing use, assistance and aid of a deadly weapon, and at that time, the defendant knowingly possessed a firearm, and on March 26, 2009, the defendant was convicted of the felony of Robbery in the 2nd Degree - Attempt in the Circuit Court of Jackson County.

An individual convicted and sentenced for this offense shall not be eligible for parole until 85 percent of the sentence is served.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

Count III. Unlawful Use Of Weapon - Subsection 9 - Shoot At/From Motor Vehicle, At Person, Motor Vehicle Or Building, Resulting In Death Or Injury (571.030-015Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of in violation of Section 571.030.1(9), RSMo, committed the class A felony of unlawful use of a weapon, punishable upon conviction under Sections 558.011 and 571.030.9, RSMo, in that on or about June 17,

2024, in the County of Jackson, State of Missouri, the defendant, knowingly discharged a firearm at another person and, as a result of the above described conduct, Confidential Victim suffered injury or death.

The punishment range for a class A felony is 10 to 30 years, or life imprisonment in the Department of Corrections.

Count IV. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about June 17, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon by, with and through, the knowing use, assistance and aid of a deadly weapon, and at that time, the defendant knowingly possessed a firearm, and on March 26, 2009, the defendant was convicted of the felony of Robbery in the 2nd Degree - Attempt in the Circuit Court of Jackson County.

An individual convicted and sentenced for this offense shall not be eligible for parole until 85 percent of the sentence is served.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

Count V. Unlawful Possession Of A Firearm (571.070-001Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.070, RSMo, committed the class D felony of unlawful possession of a firearm, punishable under Sections 558.011 and 558.002, RSMo, in that on or about June 17, 2024, in the County of Jackson, State of Missouri, the defendant knowingly possessed a firearm, and and on March 26, 2009, the defendant was convicted of the felony of Robbery in the 2nd Degree - Attempt in the Circuit Court of Jackson County.

The class D felony carries a punishment range of up to 1 year in the county jail, up to 7 years in the Department of Corrections, up to a \$10,000 fine, or a combination of fine and incarceration.

Count VI. Tampering With Motor Vehicle - 1st Degree (569.080-002Y20202999.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 569.080.1(2), RSMo, committed the class D felony of tampering in the first degree, punishable upon conviction under Sections 558.011 and 558.002, RSMo, in that on or about June 17, 2024, in the County of Jackson, State of Missouri, the defendant knowingly and without the consent of the owner unlawfully operated a red 2020 Kia Rio, an automobile.

The class D felony carries a punishment range of up to 1 year in the county jail, up to 7 years in the Department of Corrections, up to a \$10,000 fine, or a combination of fine and incarceration.

Count VII. Unlawful Use Of Weapon - Subsection 4 - Exhibiting (571.030-010Y20205212.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.030, RSMo, committed the class E felony of unlawful use of a weapon, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about June 17, 2024, in the County of Jackson, State of Missouri, the defendant knowingly exhibited, in the presence of one or more persons a firearm, a weapon readily capable of lethal use, in an angry or threatening manner.

The class E felony carries a punishment range of up to 1 year in the county jail, up to 4 years in the Department of Corrections, up to a \$10,000 fine, or a combination of fine and incarceration.

Count VIII. Armed Criminal Action (571.015-001Y20205213.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about June 17, 2024, in the County of Jackson, State of Missouri, the defendant committed the felony of Unlawful Use of a Weapon charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Unlawful Use of a Weapon by, with and through, the knowing use, assistance and aid of a deadly weapon, and at that time, the defendant knowingly possessed a firearm, and on March 26, 2009, the defendant was convicted of the felony of Robbery in the 2nd Degree - Attempt in the Circuit Court of Jackson County.

An individual convicted and sentenced for this offense shall not be eligible for parole until 85 percent of the sentence is served.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.2, RSMo. as a second offense is imprisonment by the department of corrections for a term of not less than five years and not to exceed thirty years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term not less than fifteen years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of five calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.3, RSMo. as a third offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of ten (10) calendar years.

State vs. Richard GERARD Harris Jr., Case No.

The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, 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/ Shiante McMahon
Shiante McMahon (#66613)
Assistant Prosecuting Attorney
415 East 12th Street
Floor 7M
Kansas City, MO 64106
(816) 881-3831
SMcMahon@jacksongov.org

WITNESSES:

The State's witnesses as of 7/9/2024 are included on the "State's Witness List" filed contemporaneously with this Complaint.

FILED DIVISION 1

09-Jul-2024 12:38

Date: 07/08/2024 CRN: KC2403929 I. (Name and identify law enforcement officer, or person having information as probable cause.) knowing that false statements on this form are punishable by law, state that the facts contained herein are true. I have probable cause to believe that on 06/17/2024, at 3200 E. Linwood Blvd (Date) (Address) Kansas City, Jackson Missouri Harris, Richard G. (Name of Offender(s)) (County) committed one or more criminal offense(s). B/M(Description of Identity) The facts supporting this belief are as follows: On 06/17/2024, at approximately 0048 hours, Officers of the Kansas City, Missouri Police Department were dispatched to 3200 E. Linwood Blvd. Kansas City, Jackson County, Missouri on a reported shooting. Upon arrival, Officers located an adult white female lying in the grass on the east side of Walrond Avenue, between the curb and the roadway, suffering from apparent trauma to the back of her head. The adult female was transported to an area hospital and was identified as later succumbed to her injuries on 06/20/2024 at 0454 hours. On 06/21/2024 a body exam was conducted by the Jackson County Medical Examiner's office and two defects were observed during the exam. There was a defect on the top of head and a defect on the right The death was ruled a Homicide by the Jackson County Medical Examiner's Office. During the initial investigation Detectives spoke with third party witnesses who stated that they were told that "Rich" was the one who shot and that he was driving a red Kia that was possibly stolen. was able to provide a photo of and "Rich" which was from her Facebook page and open to public view. Utilizing a department data base, a possible identification for "Rich" was made to Richard G. Harris B/M 5'5". On 06/20/2024, Detectives responded back out to the area of to conduct an area canvass. Detectives responded to where contact was made with

stated that he had not witnessed the shooting of but had heard from

CRN KC24039291

told by and "Rich" were arguing just before the shooting. He stated he had seen "Rich" in a red car and believed it was a Kia that belonged to his mom.
On 06/26/2024 a Witness contacted the Homicide Unit and advised that she was a witness to the Homicide of She advised that she is a in the past. Detectives met with and transported her to Police Headquarters to provide a formal statement. It stated she had been befriending people at the stated that she always sits by the window. She stated the she pretended to be on drugs befriended and "everybody" to know "where she could get what." spoke about being a mother and had babies, and encouraged her to go home and be with her children. She stated that meant well. She stated that was dating a guy named "Rich" who had long dreads on the back but his sides were cut off. would get money from different guys, and "Rich" would take what she had. On the night of the homicide, she didn't know that it was that was the victim and later discovered it was from the news. She stated that "Rich" didn't have full control over and she wasn't doing what he wanted her to do. Typically, she would do what he wanted her to do to keep him from beating her. She said he wasn't pimping her out, but he wanted access to her money and how she spent it. She would go have sex with men just to give "Rich" money. She stated that she was inside the and sat in a window and observed "Rich" attack and beat because she wasn't doing what he wanted her to do. She stated that "Rich" then shot her twice. She stated that she witnessed it all happen. She stated that there were other witnesses when it occurred, including a
When she was asked where "Rich" and were before the incident she stated that "Rich" and left on any vehicle and is typically on foot. She stated that she observed a sedan and a blue Honda van, and a silver SUV in the area during the shooting. She stated that "Rich" had a 9mm or Glock 19, which she was "pretty sure" was the same gun that he pointed at her in a separate incident.
A line up consisting of a photograph of Richard Harris (B/M and other individuals who share a likeness in appearance was generated and shown to her during the interview. She identified Richard Harris in the lineup and was 1000% positive, and the individual who killed
Detectives were able to recover surveillance video from the labeled and observed the camera to be attached to the west side of the building and capturing a portion of Walrond Ave and pointing south. The timestamp on the camera begins at 11:59:59.829 PM and ends at 1:00:00.224 AM. This timestamp is the same as real time.
In reviewing the street side video. Detectives observed the following:

Page 2 of 6

At 12:28:05 AM - red four door hatchback vehicle with chrome wheels, plastic front license plate holder but no license plate displayed, rear license plate affixed, believed to be a red 2020 Kia Rio, enters the frame driving

CRN KC24039291

but located on the west side of the house, on Walrond Ave. It then reverses and completes a three point turn exiting the frame before re-entering the frame by reversing southbound on Walrond Ave and parking along the east curb, facing northbound at 12:30 AM.

The driver of the red vehicle exits and walks to a silver minivan parked in the driveway of where he interacts with the occupants. The driver (and later confirmed suspect) is observed to be a black male wearing white t-shirt, orange shorts, unknown black item hanging from front right hip and white athletic shoes with darker markings towards the bottom. The suspect is wearing what appears to be fashion glasses and is wearing his hair in what appears to be dreadlocks gathered on the top of the head in a looser type of bun. Based on the suspect standing close to the red vehicle, the minivan and the victim, the suspect's stature appears to be smaller. The victim is known to be 5'1" and the suspect appears to be only slightly taller than her and slightly thinner. The suspect is distinctively out-toeing as he walks.

The victim exits the red vehicle front passenger seat at 12:31 AM. Both victim and suspect walk back and forth between the minivan and their red vehicle. At 12:33 AM, the suspect retrieves what appears to be an electronic device (appears to be either a very large cell phone or smaller tablet) from the red vehicle and hands it over to one of the occupants of the minivan. The victim and suspect continue interacting with the occupants of the minivan until 12:34 AM, when they walk back to the red car.

The victim and suspect continue to reach in and out of the red vehicle through all doors (as if searching for something) until 12:43:08 AM. At this time, the victim is observed walking northbound from around the driver side of the red vehicle (in the street) and onto the east sidewalk. As she is walking from the street and onto the east sidewalk easement, she can be seen putting her arms up and moving her hands left and right before lowering her arms back down. At this moment, the victim can be seen looking back towards the suspect by turning her head and looking over her right shoulder while continuing to walk northbound. The suspect (visible at this moment from the waist down) is observed walking towards her from the rear passenger side of the red vehicle.

At 12:43:14 AM, the suspect is observed to be in the easement, by the front end of the red vehicle. His right arm is fully extended forward and pointed a gun in the direction of the victim. At this same time, the victim is observed abruptly tucking her head into the right shoulder while simultaneously bringing her arms up to her head in a defensive posture. The suspect continues to close the distance as the victim turns and ends up being face to face with the suspect. The victim raises her arms up with her hands open facing the suspect in a reactionary defensive posture. She then turns away from him and attempts to walk away southbound. As she does this, the suspect pursues her and strikes her in the back of the head with his left arm; unable to determine open hand or closed fist. While the victim continues to advance southbound, she places her left hand on the back of the head and right hand close to it. She is bending forward at the waist and away from the suspect, who is now immediately to her right. The suspect grabs the victim with his left hand by the back of the head/hair and holds her head down as he proceeds to drag her down to the ground. The victim can be observed attempting to protect herself by holding her head with hands. The suspect brings his right hand, which is still holding the gun, to the victim's head and her body is observed to go limp at 12:43:27 AM as the

suspect begins to retrieve his right arm away from the victim's head. The suspect continues to drag the victim

CRN KC24039291

until she is all the way down on the ground, on her back. The suspect then stands over the victim and walks over her right to left. He then walks directly to the driver door of the red vehicle. As he is doing that, he can be observed pointing the handgun at the silver minivan, which is observed turning swiftly pulling out of the driveway and driving away northbound on Walrond Ave at 12:43:43 AM. The suspect begins driving the same direction at 12:43:50 AM. The vehicle moves forward a very short distance before the suspect stops and looks over at the victim for roughly two seconds. He then drives away northbound on Walrond Ave and out of view. On 06/28/2024, Detectives again responded out to and contacted to show him some photos. was escorted to a Detectives vehicle and driven around the block out of view of the was shown a photo of **Richard G. Harris B/M** to see if that was the **Rich** he was referring to He identified the photo as **Rich**. He initialed and dated the photo and wrote who he knew being with the photo as. On 07/02/2024 was escorted to Police Headquarters by Detectives from to provide a statement regarding the Homicide of Upon arriva was escorted to the 7 floor, interview room 1 where he provided the following statement. The night of the Homicide he was in and did not know about the Homicide until later. He stated he heard some arguing outside and then heard a gunshot but did not see anything when he looked outside. He stated that he knew and knew her to hang out with a short black male with long dreads named Rich. He stated he had seen Rich driving a red 4 door car. When asked if he had seen Thomas or Rich earlier in the day he stated he had not seen them that day. During the interview was shown a photo of Richard Harris B/M and identified him as Rich, and stated his hair was shorter in the picture then it is now. He was also shown a photo of a red car and he stated that it looked like the car Rich had been driving. KB was shown 2 photos with a white female and a white male in them. He identified the and the responded to Police Headquarters to provide statements. On 07/05/2024 witnesses Witness was escorted to the 7th floor, interview room 4 where he stated the following: He and were sitting on the wall across from believed to be "Rich" or "Rick" arrived in a red car that he has known "Rich" or "Rick" to drive. He stated that was talking to them as they were sitting in the car. He stated he believed it was "Rich" or "Rick" because he was a black male and he knew to be dating him and that he is a black male, and it was the car he has

seen him driving before.

CRN KC24039291

During the interview was shown a single photo of Richard Harris B/M and identified him as " Rich " or " Rick " and wrote " Rick " on the photo that was shown to him. He was also shown a photo of a red car and stated it looked similar to the car he (Rich or Rick) had been driving. He also described the vehicle to have been moved and parked in a certain spot on the street under a light before he walked away with . He was shown a photo of a white female, a black male, and two partial vehicles and stated that the car looked like where he had parked and pointed to the partial red car that was visible in the photo. He stated that he believed the white female was after being shown a photo of him and to but was unable to identify who the black male in the photos was with
Witness was then escorted to the 7 th floor interview room 4 where she provided the following statement:
She has been with when and "Rich" pulled up and parked in the driveway to the apartments. She was talking to and "Rich" were sitting in the car. She stated was in the passenger seat and "Rich" was in the Driver's seat of the vehicle. She stated she knew it was "Rich" driving the car. She stated that she and then walked away and when she returned to the house she noticed someone lying on the ground and went over to check on them and discovered it was She stated she heard sirens coming so she went back across the street in an effort not to mess with the scene.
During the interview she was shown a single photo of Richard Harris B/M and was unable to make a positive ID stating that he has longer har then what was in the photo. She was then shown a photo of a red car and stated that it looked like the car " Rich " drives. She was shown a photo containing and a black male and stated that it was in the photo and the red car that was in the photos was similar to the one " Rich " was in. She was shown a photo of Richard Harris from a Facebook photo that was taken from his publicly accessed account and stated that it looked like " Rich " but he was healthier looking in the photo then he is now and his skin looked better.
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On 07/08/2024, **Richard Harris** was taken into custody for the Homicide Investigation and an outstanding warrant for a US Marshals Probation Violation Warrant from 02/20/2024. **Harris** was transported to Police Headquarters for questioning. **Harris** was advised of his Miranda Rights, stated he understood his rights, but was unable to stay awake. Detectives only asked name and date of birth and then stopped the interview due to him falling asleep.

When Harris was taken into custody he was with two females. The females agreed to come to Headquarters to provide a statement. Harris was also driving a red 2020 Kia Rio that was stolen out of Kansas City, Missouri on 05/29/2024, which is very similar in appearance with the suspect vehicle in the surveillance video.

buring the interview with one of the females she stated that she had known **Rich** for about a month and a half to two months. She met him through another friend because she had a Fentanyl problem and **Rich** was known to help females that were addicted to it. She stated he never sold it to her but they would smoke it together. She stated **Rich** told her that if the Police tried to stop them she needed to put her seat belt on because it was going to be a high speed because he might have warrants. She further stated that **Rich** was wanting to start setting up "Johns" to rob and she did not want to have anything to do with that.

CRN	KC24039291	
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On 07/09/2024, Detectives responded out to the Metro Patrol Station to conduct another interview with **Harris**. Upon arrival we contacted Harris in his holding cell and escorted him to the interview room. Harris was advised of his Miranda rights and stated he did not understand them. He was then advised of his rights one at a time and eventually stated that he did not understand them and that he was high. The attempted interview was then concluded and he was escorted back to the detention unit where he resisted the Detention Officers going back into the holding cell.

Defendant has a prior felony conviction in that defendant was convicted of the felony of Robbery in the 2nd Degree - Attempt, in the Circuit Court of Jackson County on March 26, 2009.

Printed Name	Signature				
The Court finds probable cause and directs the issuance of a warrant this 9th day of July, 2024 .					
SIGNED BY JUDGE This is a redacted public document. The original unredacted document bears the Judge's signature.					
Judge					
Jackson Giravit Court of	Country State of Missouri				
Circuit Court of	County, State of Missouri.				