IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI $\underline{\text{AT KANSAS CITY}}$

POL	ICE NO.:	17-0795	42	
PROSECU'	TOR NO.:	0954413	318	
STATE OF MISSOURI,)	
•	PLAIN	TIFF,)	
vs.		`)	
MIKEAL FARR		`)	
11605 Food Lane,		`) CASE NO. 1716-	CR
Kansas City, MO - 64134) DIVISION	
DOB: 09/18/1997)	
Race/Sex: B/M;)	
SSN: XXX-XX-				
	DEFENI	DANT.)	

COMPLAINT

Count I. Robbery - 1st Degree (570.023-001Y20171299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 570.023, RSMo, committed the **Class A Felony of Robbery in the First Degree**, punishable upon conviction under Section 558.011, RSMo, in that on or about September 12, 2017, in the County of Jackson, State of Missouri, the defendant, acting alone or purposefully in concert with another, forcibly stole pizza, US Currency and a vehicle in the possession of another participant in the offense caused serious physical injury to

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

Count II. Armed Criminal Action (571.015-001Y197552.)

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 September 12, 2017, in the County of Jackson, State of Missouri, the defendant, either acting alone or purposefully in concert with another committed the felony of Robbery in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Robbery in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

State vs. Mikeal Farr

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. as a second offense is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of five (5) calendar years. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 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. Any punishment imposed pursuant to section 571.015 RSMo. shall be in addition 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 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/ Mary Beth Lundak
Mary Beth Lundak (#38654)
Assistant Prosecuting Attorney
415 East 12th Street Floor 7M
Kansas City, MO - 64106
(816) 881-3888
MLundak@jacksongov.org

State vs. Mikeal Farr

WITNESSES:

DET Jennifer A. Blythe, 1125 Locust, Kansas City, MO - 64106
DET Michael R. Buente, 1125 Locust, Kansas City, MO - 64106
DET Anthony L. Castelletto, 1125 Locust, Kansas City, MO - 64106

PO Dustin Dykstra, 1125 Locust, Kansas City, MO - 64106
DET Randy K. Evans, 1125 Locust, Kansas City, MO - 64106
PO Luis A. Matos, 1125 Locust, Kansas City, MO - 64106
DET Patrick J. McKenzie, 1125 Locust, Kansas City, MO - 64106
DET Paul A. Oxler, 1125 Locust, Kansas City, MO - 64106
DET Dawn N. Wilson, 1125 Locust, Kansas City, MO - 64106

CRN: 17-79542

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I, Det. Jennifer Blythe, Kansas City, M. (Name and identify law enforcement officer		L	s probable cause.)	
knowing that false statements on this for	m are punis	shable by law, st	ate that the facts contained herei	n are true.
I have probable cause to believe that on		nate), at	11605 Food Lane (Address)	in
Kansas City, Jackson County (County)	Missouri	Mikeal Farr	(Name of Offender(s))	_
B/M 09/19/1997 SSN:)			

The facts supporting this belief are as follows:

Robbery-1st Degree Armed Criminal Action

Date: 9/14/2017

On 09/12/2017 at approximately 0032 hours, Officers were dispatched to 11314 Eastern Ave in regard to suspicious activity and an abandoned vehicle with a Domino's Pizza sign on the roof of the vehicle. Further investigation revealed the vehicle belonged to the victim of an Armed Robbery that occurred at 7434 Food Ln, Kansas City, Jackson County, Missouri. Limited statements made by the victim prior to him being transported to an area hospital for potential life threatening injuries revealed he had been struck by a baseball bat about the head and body and his vehicle, \$30 cash and the pizza he had been called to deliver were stolen. Detectives contacted the victim at the hospital and during the interview he stated that there were three black male suspects, a female suspect, and a white male suspect.

Detectives later conducted a Facebook check of the phone number used to order the pizza (913-215-1526) and it was associated to a white female with a Facebook name, "Leann Brooke Gant." The Facebook page tagged James Gant and indicated they were in a relationship. An ARS of James Gant revealed a recent report where he was arrested and the officer stated that **Mikeal Farr**, James Gant, and Leann Howe all resided at 11605 Food Lane. Leann Brooke Gant was later determined to be Leann Howe W/F 05/13/1997 after detectives compared a DOR photo to the Facebook photograph. Howe's address was listed as 11605 Food Lane in multiple recent police reports, which is approximately 200 yds from the location where the robbery occurred.

CRN	17-79542
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suspect #5, later identified as **Mikeal Farr B/M 09/19/1997**, and suspect #6, unknown, were shown driving away in the victim's vehicle as the victim lay in the street.

On 09/14/2017, Detectives and Officers responded to 11605 Food Ln and contacted multiple occupants of the residence. Howe signed a Consent to Search Form allowing law enforcement personnel to search the residence. During this search, Domino's pizza boxes and a Domino's pizza delivery bag were located in the kitchen. The pizza boxes still had the tags and included the order information as: Address of 7434 Food Lane, order phone number as 913-215-1526, and 9/11/2017 2333 hours as the order date and time. Howe and Lambson, who admitted to staying at the address in the last week, were subsequently taken into custody. A short time later, witnesses advised detectives that Stone was by the building and he is also a resident at the address. Stone was then arrested on a probation violation warrant.

Detectives interviewed Stone, Lambson, and Howe at Police Headquarters after they waived their rights. Howe admitted she had placed a delivery order with Domino's using her own phone and admitted giving a false address for the delivery location. She believed "something" was going to happen just prior to the robbery. Howe said that **Mikeal Farr**, whom she had been with in the apartment, grabbed a bat with black tape on the handle and the words "blood gang" on it and put on a mask and exited the apartment with Stone, Lambson, and Miriah Farr. Howe stated that she stayed inside her residence when the group left and a short time later Lambson and Stone came back into the residence carrying pizza boxes and a pizza bag. Howe stated she was told by the group of suspects when they returned to her residence that when they went outside they met the victim in the apartment complex **Mikeal Farr** struck the victim with the bat multiple times, Miriah Farr stomped the victim's head multiple times, and suspect #6 punched the victim multiple times as Lambson took the pizza from the victim's car. Howe also stated that suspect #6 attempted to steal the victim's vehicle, however could not drive a stick shift and abandoned the vehicle in the area. Howe stated that all of the suspects were in her residence eating the pizza and the bat was still inside of her residence somewhere.

Stone confessed to his involvement in the robbery and stated that he did not know **Mikeal Farr** was going to beat the victim with a bat. Stone stated that suspect #6 punched the victim three times, Miriah Farr stomped the victim's head multiple times, Lambson took the pizza from the victim's car, and he was present but did not touch the victim. Stone stated that he retrieved the bat from a church after **Mikeal Farr** told him that he hid it there and he brought it back to the residence.

Lambson confessed to planning a stealing once the victim arrived with the pizza. Lambson stated that the victim became suspicious and once he reentered his car, **Mikeal Farr** and Miriah Farr pulled him out of the car and **Mikeal Farr** beat him with a bat. Lambson stated that she took the pizza from the victim's car and ran back to the residence.

After the information was relayed in the interviews, KCPD officers responded back out to 11605 Food Lane to hold on the residence until a search warrant was obtained for the additional evidence. At that time, **Mikeal Farr** and Miriah Farr were taken into custody and transported to Police Headquarters and interviewed after they both waived their Miranda Rights.

Miriah Farr confessed to participating in the robbery and stated that she stomped the victim's head multiple times.

Mikeal Farr confessed to striking the victim with the bat and stated that he needed to feed his people. **Mikeal Farr** stated that the bat used in the robbery was placed behind a dresser in the bedroom with a crib at the residence.

Printed Name	Det. Jennifer Blythe, #5490	Signature /s/Det. Jennifer Blythe, #5490	
The Court finds	s probable cause and directs the issuance	e of a warrant this day of	·
	Judg	ge	
	Circuit Court of	County, State of Missouri.	

CDN. 17 70542

Date. 9/14/2017				CRN. 17-19342	
I, Det. Jennifer Blythe, Kansas City, M. (Name and identify law enforcement officer		1		probable cause.)	
knowing that false statements on this for	m are punis	shable by law,	sta	ate that the facts contained herein are	true.
S	•	•			
I have probable cause to believe that on			ıt _	11605 Food Lane	in
	(Da	ate)		(Address)	
Kansas City, Jackson County	Missouri	Miriah Farr			
(County)	_ 1411550411	TVIIII I III		(Name of Offender(s))	
B/F 08/14/1998 SSN		c	on	nmitted one or more criminal offense	e(s).
(Description of Identity	y)				
The facts supporting this belief are as fol	llower				
	HUWS.				

Robbery-1st Degree Armed Criminal Action

Data: 0/14/2017

On 09/12/2017 at approximately 0032 hours, Officers were dispatched to 11314 Eastern Ave in regard to suspicious activity and an abandoned vehicle with a Domino's Pizza sign on the roof of the vehicle. Further investigation revealed the vehicle belonged to the victim of an Armed Robbery that occurred at 7434 Food Ln, Kansas City, Jackson County, Missouri. Limited statements made by the victim prior to him being transported to an area hospital for potential life threatening injuries revealed he had been struck by a baseball bat about the head and body and his vehicle, \$30 cash and the pizza he had been called to deliver were stolen. Detectives contacted the victim at the hospital and during the interview he stated that there were three black male suspects, a female suspect, and a white male suspect.

Detectives later conducted a Facebook check of the phone number used to order the pizza (913-215-1526) and it was associated to a white female with a Facebook name, "Leann Brooke Gant." The Facebook page tagged James Gant and indicated they were in a relationship. An ARS of James Gant revealed a recent report where he was arrested and the officer stated that Mikeal Farr, James Gant, and Leann Howe all resided at 11605 Food Lane. Leann Brooke Gant was later determined to be Leann Howe W/F 05/13/1997 after detectives compared a DOR photo to the Facebook photograph. Howe's address was listed as 11605 Food Lane in multiple recent police reports, which is approximately 200 yds from the location where the robbery occurred.

suspect #5, later identified as Mikeal Farr B/M 09/19/1997, and suspect #6, unknown, were shown driving away in the victim's vehicle as the victim lay in the street.

On 09/14/2017, Detectives and Officers responded to 11605 Food Ln and contacted multiple occupants of the residence. Howe signed a Consent to Search Form allowing law enforcement personnel to search the residence. During this search, Domino's pizza boxes and a Domino's pizza delivery bag were located in the kitchen. The pizza boxes still had the tags and included the order information as: Address of 7434 Food Lane, order phone number as 913-215-1526, and 9/11/2017 2333 hours as the order date and time. Howe and Lambson, who admitted to staying at the address in the last week, were subsequently taken into custody. A short time later, witnesses advised detectives that Stone was by the building and he is also a resident at the address. Stone was then arrested on a probation violation warrant.

Detectives interviewed Stone, Lambson, and Howe at Police Headquarters after they waived their rights. Howe admitted she had placed a delivery order with Domino's using her own phone and admitted giving a false address for the delivery location. She believed "something" was going to happen just prior to the robbery. Howe said that Mikeal Farr, whom she had been with in the apartment, grabbed a bat with black tape on the handle and the words "blood gang" on it and put on a mask and exited the apartment with Stone, Lambson, and Miriah Farr. Howe stated that she stayed inside her residence when the group left and a short time later Lambson and Stone came back into the residence carrying pizza boxes and a pizza bag. Howe stated she was told by the group of suspects when they returned to her residence that when they went outside they met the victim in the apartment complex Mikeal Farr struck the victim with the bat multiple times, Miriah Farr stomped the victim's head multiple times, and suspect #6 punched the victim multiple times as Lambson took the pizza from the victim's car. Howe also stated that suspect #6 attempted to steal the victim's vehicle, however could not drive a stick shift and abandoned the vehicle in the area. Howe stated that all of the suspects were in her residence eating the pizza and the bat was still inside of her residence somewhere.

Stone confessed to his involvement in the robbery and stated that he did not know Mikeal Farr was going to beat the victim with a bat. Stone stated that suspect #6 punched the victim three times, **Miriah Farr** stomped the victim's head multiple times, Lambson took the pizza from the victim's car, and he was present but did not touch the victim. Stone stated that he retrieved the bat from a church after Mikeal Farr told him that he hid it there and he brought it back to the residence.

Lambson confessed to planning a stealing once the victim arrived with the pizza. Lambson stated that the victim became suspicious and once he reentered his car, Mikeal Farr and **Miriah Farr** pulled him out of the car and Mikeal Farr beat him with a bat. Lambson stated that she took the pizza from the victim's car and ran back to the residence.

After the information was relayed in the interviews, KCPD officers responded back out to 11605 Food Lane to hold on the residence until a search warrant was obtained for the additional evidence. At that time, Mikeal Farr and **Miriah Farr** were taken into custody and transported to Police Headquarters and interviewed after they both waived their Miranda Rights.

Miriah Farr confessed to participating in the robbery and stated that she stomped the victim's head multiple times.

Mikeal Farr confessed to striking the victim with the bat and stated that he needed to feed his people. Mikeal stated that the bat used in the robbery was placed behind a dresser in the bedroom with a crib at the residence.

Printed Name	Det. Jennifer Blythe, #5490	Signature /s/Det. Jennifer Blythe, #5490	
The Court finds	s probable cause and directs the issuance	e of a warrant this day of	·
	Judg	ge	
	Circuit Court of	County, State of Missouri.	

CDN. 17 70542

Date. 9/14/2017				CKN. 17-19342	
I, Det. Jennifer Blythe, Kansas City, M. (Name and identify law enforcement officer				obable cause.)	
knowing that false statements on this for	m are punis	shable by law	v, state	that the facts contained h	nerein are true.
I have probable cause to believe that on			, at <u>1</u>	1605 Food Lane (Address)	in
Kansas City, Jackson County (County)	Missouri	Leann How	/e	(Name of Offender(s))	
W/F 05/13/1997 SSN: (Description of Identity	y)		comr	mitted one or more crimina	al offense(s).
The facts supporting this belief are as follows:	llows:				

Robbery-1st Degree Armed Criminal Action

Data: 0/14/2017

On 09/12/2017 at approximately 0032 hours, Officers were dispatched to 11314 Eastern Ave in regard to suspicious activity and an abandoned vehicle with a Domino's Pizza sign on the roof of the vehicle. Further investigation revealed the vehicle belonged to the victim of an Armed Robbery that occurred at 7434 Food Ln, Kansas City, Jackson County, Missouri. Limited statements made by the victim prior to him being transported to an area hospital for potential life threatening injuries revealed he had been struck by a baseball bat about the head and body and his vehicle, \$30 cash and the pizza he had been called to deliver were stolen. Detectives contacted the victim at the hospital and during the interview he stated that there were three black male suspects, a female suspect, and a white male suspect.

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Detectives interviewed Stone, Lambson, and **Howe** at Police Headquarters after they waived their rights. **Howe** admitted she had placed a delivery order with Domino's using her own phone and admitted giving a false address for the delivery location. She believed "something" was going to happen just prior to the robbery. **Howe** said that Mikeal Farr, whom she had been with in the apartment, grabbed a bat with black tape on the handle and the words "blood gang" on it and put on a mask and exited the apartment with Stone, Lambson, and Miriah Farr. **Howe** stated that she stayed inside her residence when the group left and a short time later **Lambson** and **Stone** came back into the residence carrying pizza boxes and a pizza bag. **Howe** stated she was told by the group of suspects when they returned to her residence that when they went outside they met the victim in the apartment complex Mikeal Farr struck the victim with the bat multiple times, Miriah Farr stomped the victim's head multiple times, and suspect #6 punched the victim multiple times as Lambson took the pizza from the victim's car. **Howe** also stated that suspect #6 attempted to steal the victim's vehicle, however could not drive a stick shift and abandoned the vehicle in the area. **Howe** stated that all of the suspects were in her residence eating the pizza and the bat was still inside of her residence somewhere.

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Miriah Farr confessed to participating in the robbery and stated that she stomped the victim's head multiple times.

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Printed Name	Det. Jennifer Blythe, #5490	Signature /s/Det. Jennifer Blythe, #5490	
The Court finds	s probable cause and directs the issuance	e of a warrant this day of	·
	Judg	ge	
	Circuit Court of	County, State of Missouri.	

CDN: 17 705/2

Datc. 3/14/2017			CIGN. 17-19342	
I, Det. Jennifer Blythe, Kansas City, M (Name and identify law enforcement officer			probable cause.)	
knowing that false statements on this for	m are punis	shable by law, sta	ate that the facts contained he	rein are true.
I have probable cause to believe that on		ate) , at	11605 Food Lane (Address)	in
Kansas City, Jackson County (County)	Missouri	Tanner Stone	(Name of Offender(s))	
W/M 02/26/1997 SSN (Description of Identity	7)	cor	nmitted one or more criminal	offense(s).
The facts supporting this belief are as fol	llowe.			

Robbery-1st Degree

Armed Criminal Action

Date: 0/14/2017

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Detectives interviewed **Stone**, Lambson, and Howe at Police Headquarters after they waived their rights. Howe admitted she had placed a delivery order with Domino's using her own phone and admitted giving a false address for the delivery location. She believed "something" was going to happen just prior to the robbery. Howe said that Mikeal Farr, whom she had been with in the apartment, grabbed a bat with black tape on the handle and the words "blood gang" on it and put on a mask and exited the apartment with **Stone**, Lambson, and Miriah Farr. Howe stated that she stayed inside her residence when the group left and a short time later Lambson and **Stone** came back into the residence carrying pizza boxes and a pizza bag. Howe stated she was told by the group of suspects when they returned to her residence that when they went outside they met the victim in the apartment complex Mikeal Farr struck the victim with the bat multiple times, Miriah Farr stomped the victim's head multiple times, and suspect #6 punched the victim multiple times as Lambson took the pizza from the victim's car. Howe also stated that suspect #6 attempted to steal the victim's vehicle, however could not drive a stick shift and abandoned the vehicle in the area. Howe stated that all of the suspects were in her residence eating the pizza and the bat was still inside of her residence somewhere.

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Miriah Farr confessed to participating in the robbery and stated that she stomped the victim's head multiple times.

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Printed Name	Det. Jennifer Blythe, #5490	Signature /s/Det. Jennifer Blythe, #5490	
The Court finds	s probable cause and directs the issuance	of a warrant this day of	·
	Judg	ge	
	Circuit Court of	County, State of Missouri.	

CRN: 17-79542

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I, Det. Jennifer Blythe, Kansas City, M (Name and identify law enforcement officer				able cause.)	
knowing that false statements on this for	-		-		nerein are true.
I have probable cause to believe that on		ate)	_ , at <u>116</u>	605 Food Lane (Address)	in
Kansas City, Jackson County (County)	Missouri	Madison	<u>Lambson</u> (Name of Offender(s))	
W/F 03/10/1999 (Description of Identity	y)		commit	ted one or more crimin	al offense(s).
The facts supporting this belief are as fo	llows:				

Robbery-1st Degree Armed Criminal Action

Date: 9/14/2017

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suspect #5, later identified as Mikeal Farr B/M 09/19/1997, and suspect #6, unknown, were shown driving away in the victim's vehicle as the victim lay in the street.

On 09/14/2017, Detectives and Officers responded to 11605 Food Ln and contacted multiple occupants of the residence. Howe signed a Consent to Search Form allowing law enforcement personnel to search the residence. During this search, Domino's pizza boxes and a Domino's pizza delivery bag were located in the kitchen. The pizza boxes still had the tags and included the order information as: Address of 7434 Food Lane, order phone number as 913-215-1526, and 9/11/2017 2333 hours as the order date and time. Howe and **Lambson**, who admitted to staying at the address in the last week, were subsequently taken into custody. A short time later, witnesses advised detectives that Stone was by the building and he is also a resident at the address. Stone was then arrested on a probation violation warrant.

Detectives interviewed Stone, **Lambson**, and Howe at Police Headquarters after they waived their rights. Howe admitted she had placed a delivery order with Domino's using her own phone and admitted giving a false address for the delivery location. She believed "something" was going to happen just prior to the robbery. Howe said that Mikeal Farr, whom she had been with in the apartment, grabbed a bat with black tape on the handle and the words "blood gang" on it and put on a mask and exited the apartment with Stone, **Lambson**, and Miriah Farr. Howe stated that she stayed inside her residence when the group left and a short time later **Lambson** and Stone came back into the residence carrying pizza boxes and a pizza bag. Howe stated she was told by the group of suspects when they returned to her residence that when they went outside they met the victim in the apartment complex Mikeal Farr struck the victim with the bat multiple times, Miriah Farr stomped the victim's head multiple times, and suspect #6 punched the victim multiple times as **Lambson** took the pizza from the victim's car. Howe also stated that suspect #6 attempted to steal the victim's vehicle, however could not drive a stick shift and abandoned the vehicle in the area. Howe stated that all of the suspects were in her residence eating the pizza and the bat was still inside of her residence somewhere.

Stone confessed to his involvement in the robbery and stated that he did not know Mikeal Farr was going to beat the victim with a bat. Stone stated that suspect #6 punched the victim three times, Miriah Farr stomped the victim's head multiple times, **Lambson** took the pizza from the victim's car, and he was present but did not touch the victim. Stone stated that he retrieved the bat from a church after Mikeal Farr told him that he hid it there and he brought it back to the residence.

Lambson confessed to planning a stealing once the victim arrived with the pizza. **Lambson** stated that the victim became suspicious and once he reentered his car, Mikeal Farr and Miriah Farr pulled him out of the car and Mikeal Farr beat him with a bat. **Lambson** stated that she took the pizza from the victim's car and ran back to the residence.

After the information was relayed in the interviews, KCPD officers responded back out to 11605 Food Lane to hold on the residence until a search warrant was obtained for the additional evidence. At that time, Mikeal Farr and Miriah Farr were taken into custody and transported to Police Headquarters and interviewed after they both waived their Miranda Rights.

Miriah Farr confessed to participating in the robbery and stated that she stomped the victim's head multiple times.

Mikeal Farr confessed to striking the victim with the bat and stated that he needed to feed his people. Mikeal stated that the bat used in the robbery was placed behind a dresser in the bedroom with a crib at the residence.

Printed Name	Det. Jennifer Blythe, #5490	Signature /s/Det. Jennifer Blythe, #5490	
The Court finds	s probable cause and directs the issuance	of a warrant this day of	·
	Judg	ge	
	Circuit Court of	County, State of Missouri.	