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Chief Disciplinary Counsel Pratzel,

The following complaint against St. Louis County Prosecutor, Robert McCulloch as well as Assistant St. Louis County Prosecutors, Kathi Alizadeh and Sheila Whirley, both of whom at all times referred to herein being under the professional supervision of Robert McCulloch, is being filed by the undersigned citizens of the State of Missouri. After our review of statements, actions, transcripts, videos, testimony, evidence, interviews, conversations and lack of action on the part of each of these attorneys as they pertain to the prosecution, or lack thereof, of then Ferguson police officer, Darren Wilson, for the admitted and known killing of unarmed teenager, Michael Brown Jr., we have sufficient reason to believe that each of these attorneys have violated a number of Missouri Rules of Professional Conduct, including the gross failure to vigorously represent their client – the citizens of the St. Louis Missouri, in their capacity as prosecutors.

The undersigned bring to the attention of the Office of the Chief Disciplinary Counsel which has the independent responsibility to investigate potential violations of the Missouri Rule of Professional Conduct as well as complaints filed with this office, that as attorneys representing each of the undersigned as citizens and residents of this state we have been misled, underrepresented, subjected to waste of millions of our tax dollars and put at risk for our safety due to the negligence and intentional acts of gross irresponsibility on the part of the Prosecutor, Bob McCulloch and his assistant prosecuting attorneys, Kathi Alizadeh and Sheila Whirley.

More specifically we believe that we, and all citizens of the State of Missouri and residents of St. Louis County in particular, have been harmed by the following acts of misconduct. Considering the duty of the OCDC to initiate its own investigation of potential misconduct, this list is not exhaustive.

1) RULE 4-3.3: CANDOR TOWARD THE TRIBUNAL

(a) A lawyer shall not knowingly:

(1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer;

(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or

(3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer's client, or a witness called by the lawyer has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal. A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter, that the lawyer reasonably believes is false.

(b) A lawyer who represents a client in an adjudicative proceeding and who knows that a person intends to engage, is engaging, or has engaged in criminal or fraudulent conduct related to the proceeding shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal.

(c) The duties stated in Rule 4-3.3(a) and (b) continue to the conclusion of the proceeding and apply even if compliance requires disclosure of information otherwise protected by Rule 4-1.6.

(d) In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the lawyer that will enable the tribunal to make an informed decision, whether or not the facts are adverse.

Evidence of Violation: Kathi Alizadeh, with the assistance of Sheila Whirley and presumably the knowledge of McCulloch, presented an outdated statute towards the beginning of the Grand Jury hearings on September 16th (Volume 5 page 5) In a so-called attempt to correct the misleading the Grand Jurors were updated with more misinformation on November 21st 2014 (volume 24 page 132). Nineteen days and countless testimonies later the grand jurors are presented a "reduced down statute so that it is applicable to this case". The statement sounds leading and the statute is yet altered and not explained to the jurors correctly. Alizadeh hands the jurors a "statement" titled "law enforcements officer's use of force when making an arrest". Did the prosecutors develop a statement to get a no true bill? We need to know what exactly the grand jurors were presented with. This is the foundation of the case.

Evidence of Violation: The day of deliberation Kathi and Sheila Whirley explain the charges to the grand jury and tell them Darren Wilson has said he was attempting to arrest Michael Brown as well as they are to take into consideration Darren Wilson was assaulted by Michael Brown. (Volume 24 page 133)

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Presentation of an outdated instruction (Volume V, page 5), a massively critical error that established the mindset of the jurors as they framed and considered each witness and submitted evidence - instructions given the Michael Brown grand jury describing the police "use of force" laws was" incorrect and misleading". (- from the Daily Kos) The outdated law was deemed unconstitutional in 1985, in *Tennessee v. Garner*, 47 U.S. 1. Although lawyers are to avoid even the appearance of impropriety, numerous commentators and journalists have the distinct impression that Alizadeh "deliberately attempted to give the Grand Jury a false impression of the law, only to slip in an unclear, unexplained "correction" at the last minute which would be far too weak to override the prevailing impression gained from weeks of testimony which had been reviewed through a jaundiced lens..." <http://www.dailykos.com/story/2014/12/04/1349421/-Missouri-AG-Confirms-Michael-Brown-Grand-Jury-Misled-by-St-Louis-DA?detail=facebook#>.

This purported error on the part of Alizadeh and Whirley, while inexcusably negligent at best, closely mirrors a historical practice of sandbagging, the act of one party presenting an incorrect instruction of law to the court and the opposing counsel waiting until the "trial" was over to raise the objection. The practice of sandbagging was also abrogated and abolished more than 30 years ago by the Missouri Supreme Court in the case of *Fahy v Dresser Industries*. 740 S.W.2d 635 (1987). Though this was not a trial and there was no opposing counsel, the reasoning behind *Fahy* applies. The self-correction came far too late in the case to undo the damage caused.

Suborning Perjured Testimony. Despite a subsequent interview in which McCulloch attempts to minimize the import of knowingly submitting false testimony to the Grand Jury in order to protect himself from criticism, he had an obligation as the prosecuting attorney to adhere to the Rules of Professional Ethics as they pertain to presenting false testimony as well as an obligation under the Rules to present the best and most accurate case to the Grand Jury. His "dump truck" method of literally dumping thousands of pages of interviews, evidence and testimony without any direction from his office had the effect, if not intent, of confounding them with massive amounts of conflicting evidence. <https://www.youtube.com/watch?v=dRYeRofVo8Q>.

(Darren Wilson's Testimony) Particularly as it pertained to Darren Wilson, which when considering all other decisions and acts suggest McCulloch's intentional act of defending Wilson rather than prosecuting him, Alizadeh and Whirley had an obligation to advise the Grand Jury of Wilson's perjured testimony regarding the most critical point of the case.. Wilson's claim that he knew of the Cigarello theft when he passed Michael Brown and Dorian Johnson was inconsistent with testimony of Wilson's supervisor who immediately arrived on the scene and took Wilson's statement. Had McCulloch not abrogated his duty to the people of the State of Missouri and thoroughly investigated this case, he would have known and made known to the Grand Jury the multiple instances of inconsistencies of Wilson's claim that he knew of the Ferguson Market call at the time of the killing. The undersigned, Christi Griffin, was present at the Ferguson Police Station on August 10th, hours following the killing, when Chief Jackson vehemently stated in the presence of approximately 15 community leaders and clergy that Darren Wilson emphatically did not know of the Ferguson Market radio call at the time he stopped Brown and Dorian Johnson. Several people in attendance have confirmed recollection of Jackson's statements.

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Additionally, the Report of The Medical Examiner, reflecting on the statement of a Detective of the St. Louis County Police Department made no mention of the Wilson having knowledge of the Ferguson Market theft. Prosecutors accepted, without question, the implausible statements of Darren Wilson that Michael Brown, without provocation and while still holding the Cigarettes reached into Wilson's car and started punching him before reaching across Wilson from the left side of the car attempting to retrieve Wilson's gun.

In his interview with the St. Louis County Police Detective. Wilson claims the confrontation with Brown took place at 1204 p.m. The Riot Call report submitted as evidence indicates the first call went out at 11:43 a.m. which is consistent with the timing given by other witness that the incident occurred at approximately 11:40. The Radio Traffic Report shows no times. At no time during the Darren Wilson's statement to a detective who arrived on the scene did he reference any knowledge or correlation to the Ferguson Market call. (Volume 5, pgs. 31-34) On page 52-54, the same detective testified that Darren Wilson did not get the call regarding the Ferguson Market. Another detective testified that Wilson mentioned nothing about Ferguson Market, (pg, 101) Despite several indications that Wilson was unaware of Ferguson theft, prosecutors allowed Wilson's testimony without pointing out the inconsistency to the Grand Jury. Numerous leading questions were more along the line of a defense attorney than prosecutor. (Volume 5, page 195.)

Despite the admitted incredulous federal interview of Witness 41, McCulloch, Alizadeh and Whirley choose to present her as a witness. Knowing her testimony would implausibly mirror that of Darren Wilson and thus taint the Grand Jury's perception of the facts they allowed, the false testimony in violation of the Rules of Professional Conduct. Though McCulloch claimed the Grand Jury would be able to determine the credibility of the witnesses, the repeated use of her statements in the press by professional pundits makes it obvious that determination of her credibility without challenge by prosecution was clearly not a given. Since the credibility of a witness can only be properly assessed through cross examination and no such 6th Amendment right to confront witness applies to a grand jury proceeding, the decision to dump multiple witnesses on the Grand Jury without a method of determining credibility appears to go beyond incompetence and negligence and rises to a level of calculated contempt. McCulloch's dismissive attitude about putting on witnesses he knew would present outright false testimony, is a gross abuse of his authority. Special Rules of Conduct that pertain to prosecutors as set forth by the Missouri Supreme Court do not extend to them having the unilateral authority to abrogate Supreme Court Rule of Professional Conduct.

RULE 4-1.1: COMPETENCE

A lawyer shall provide competent representation to a client. Competent representation requires the legal knowledge, skill, thoroughness and preparation reasonably necessary for the representation.

Even a cursory review of the Grand Jury transcript initially released only in part by Bob

Initials ca AK BJ CS NR AB nru

McCulloch, suggests there was sufficient evidence in the possession of the Office of the Prosecuting attorney to have issued an indictment against Darren Wilson yet presented a case to the Grand Jury to secure an indictment from them. Historically, courts have viewed submissability of a case "in a light most favorable to the plaintiff." The plaintiff is to receive the benefit of all inferences reasonably drawn from the evidence, and defendant's evidence that does not support plaintiff's case is to be disregarded. E.g., *Hansome v. Northwestern Cooperage Co.*, 679 S.W.2d 273, 274 (Mo. banc 1984). Prosecutors were not only negligent and acted with incompetence by failing to present a case that would be most favorable to the plaintiff, The State of Missouri, prior and subsequent actions of the County Prosecutor when viewed in their totality suggest that the case was intentionally represented in such a manner and to such a degree that it failed to render justice in this case by indicting Darren Wilson and has perpetuated a dangerous precedence of protecting law enforcement from prosecution no matter how egregious, reckless or intentional their acts of brutality or murder.

Evidence of Violation: *The prosecutor is an independent administrator of justice. The primary responsibility of a prosecutor is to seek justice, which can only be achieved by the representation and presentation of the truth. This responsibility includes, but is not limited to, ensuring that the guilty are held accountable, that the innocent are protected from unwarranted harm, and that the rights of all participants, particularly victims of crime, are respected.*

McCulloch, Alizadeh and Whirley knowingly and willfully presented evidence and or witnesses that were known to them as not truthful which is in contravention to presentation of the truth.

In his KTRS interview, McCulloch made it clear that those who lied under oath will not be held accountable for perjury, an abrogation of his duty to ensuring guilty parties are held accountable. Such prosecution of any, however, would necessarily require prosecution of Wilson. The prosecutor's responsibility is for the presentation of the truth. Intentionally presenting false witnesses and false statements under the guise of the irresponsible "dump truck" approach was a violation of that duty.

Volume 1 page 19 August 20th 2014, Alizadeh advises the jurors, she and Whirley can only answer procedural questions or questions pertaining to law but when asked to do so, dismissed the jurors questions.

Evidence of Violation: *Volume 5 page 5-6 Prosecution provided improper statutes to jury on which to consider evidence and eventually base their findings.*

Lack of Preparation: *While expecting lay jurors to review, hear, understand and interpret thousands of pages of testimony, interviews and evidence, Alizadeh and Whirley frequently mislabeled and misplaced documents. In at least two instances, Whirley purportedly erred by assigning the same Exhibit number to two pieces of evidence. Ironically, both of those errors occurred with the testimony of Dorian Johnson, the person closest to the deadly confrontation and whose testimony has been noted to be the most consistent. Ironically, it's the testimony of Dorian*

Initials CW CA LW CH Dr AB nmw

Johnson that wasn't released with the first group of the transcript. With a man's life purported hanging in the balance, the Prosecutors were grossly "negligent" in the handling of the documents and more likely than not based on the overall handling of the case, intentionally mislabeled and misplaced documents in order to confound the jurors.

Failure to Investigate: In a paid interview following the Grand Jury decision, Darren Wilson openly admits that before shooting Michael Brown that he stopped "and thought if he could legally kill him", providing further evidence the prosecutors knew or should have known of sufficient degree of culpability of premeditated murder. McCulloch had a responsibility to search for the truth. He came to his conclusion long before a thorough investigation of all the facts.

Lack of Instruction: McCulloch abrogated his duty as a prosecutor by failing to provide any direction to the Grand Jury as to the charges to be considered

Failure to Examine: Alizadeh and Whirley abrogated their duty to question Darren Wilson's implausible statements of Michael Brown, who, according to Wilson "looked like a demon" and "Hulk Hogan" and was striking him with such intensity that he thought the next blow could be "fatal". The slight abrasions on Darren Wilson's face, which could have been self-inflicted after he left the scene, were inconsistent with being pummeled to the point of unconsciousness. The medical reports indicate nothing more than a bruise and no broken bones. 2) McCulloch as well as Alizadeh and Whirley acted as defense attorneys protecting Darren Wilson rather than as prosecutors protecting the interests of the people. 3) Neither Alizadeh nor Whirley questioned any aspect of the medical evidence despite the toxicology report indicating urine samples taken on August 9th not being examined for three days, eliminating the accuracy of a number of significant drugs 4) While Alizadeh and Whirley challenged the testimony of witnesses who supported the contention that Wilson was unjustified in shooting an unarmed teenager when his hands were clearly visible, very little if any challenges were made of Darren Wilson or any witness who support a non-indictment of Wilson. 5) Alizadeh and Whirley improperly failed to give sufficient weight to the collaborating testimony of Dorian Johnson and Tiffany Wilson as well as the excited utterances and physical hand movement of the construction workers as shown in the video.

Misleading the Public: Despite advising an unsuspecting public that all documents would be released following the press conference, McCulloch's office withheld the majority of 64 witness interviews, including the joint federal/county interview of the witness closest to the confrontation, Michael Brown's friend, Dorian Johnson. Only 24 witness interviews were released and only when "caught" by the media withholding thousands of pages of documents, did McCulloch and his office administrator flippantly offer three different reasons why the additional documents were not released. 1) McCulloch during the KTRS interview - they were just "overlooked" 2) Administrator - the documents weren't ready and 3) The "Feds" asked us not to release their documents (though some of the "Fed's" documents were released). Considering the initial documents could have been released with a caveat that others would be forthcoming, McCulloch's KTRS claim that it was simply an oversight was either disingenuous at best or reflects on incompetence and negligence in the handling of this case.

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Disregard for Life and Property: Bob McCulloch failed to act with promptness in his decision to delay the announcement of the Grand Jury decision. In his KTRS interview, McCulloch claims his decision to delay announcement of the Grand Jury decision until 8:00 p.m. on November 24th, 2014, a time when police agitation would be less visible and fires and/or looting would more likely to occur, was based on the need for his office and the press to prepare. The KTRS interviewer framed questions to leave the impression that McCulloch's only option was to wait until the following day – risking the certainty that leaks could occur. No mention was made of an earlier press conference. In fact, the Grand Jury had made their decision at noon that day and McCulloch's office would have been immediately notified. Schools and hospitals had been advised, the judiciary had been advised and the media announced that a press conference would take place at 4:00 p.m. McCulloch knew for months the likely outcome based on the manner in which his office presented the case. To suggest that he had to take eight hours to write his (unnecessarily lengthy and incendiary) statement was not simply a gross display of incompetence but suggests complicity in a much larger plan for unrest and mysteriously erupted fires after dark. To say the media needed eight hours to prepare for a press conference they've braced for weeks prior was disingenuous. Considering the risk to life and property by waiting eight hours to release the decision, the failure of McCulloch to have been prepared with at least a substantially written statement and his failure to have the press at his office within the hour in order to make the announcement at a more reasonable hour, is inexcusable, incompetent and a breach of duty.

RULE 4-1.6: CONFIDENTIALITY OF INFORMATION

(a) A lawyer shall not reveal information relating to the representation of a client unless the client gives informed consent, the disclosure is impliedly authorized in order to carry out the representation, or the disclosure is permitted by Rule 4-1.6(b).

Evidence of Violation: Release of transcripts was done without consent of the state or federal government. McCulloch did not obtain approval through the St. Louis County Circuit Court to release court documents. At the time of announcement state court judges stated they did not want information released. The federal government also expressed that they did not want their documents released due to their pending investigation of charges against Darren Wilson. Additionally, McCulloch willfully and intentionally dumped evidence into the public as a means of tainting the federal investigation and hinder any possible convening of a second grand jury. Prosecution dumped this information as if a trial had been commenced and the defendant found not guilty and guised it as transparency.

In addition thorough investigation of the jury leak by Susan M. Nichols was not done. Prosecution just dismissed it as if it had no legal relevance to the credibility of the jurors. By not investigating thoroughly, confidential information of the case was jeopardized.

RULE 4-1.8: CONFLICT OF INTEREST: PROHIBITED TRANSACTIONS

(b) A lawyer shall not use information relating to representation of a client to the

Initials CCW CS FWJ CA RT MD nmw

disadvantage of the client unless the client gives informed consent, except as permitted or required by these Rules.

Evidence of Violation: A prosecutor should zealously protect the rights of the individuals, but without representing any individual as a client. The prosecution continually used the video of an alleged robbery of the victim to the State's disadvantage. Officer Wilson and his supervisor stated Wilson had no knowledge of the robbery. Release of the video into the mainstream as well as to the Grand Jury, helped to justify the defendant's case not the State's. Viewed in context of the prosecution presenting this case by providing false statements, false witnesses and evidence that appeared to justify the actions as of Wilson, including but not limited to the repeated reference to the presence of marijuana in Michael Brown's system, gives the overall appearance of impropriety of representing Wilson and not the State.

In addition, the prosecution played audio of witness interview in addition to presenting the witnesses themselves. This appears to be a tactic to create contradictions and therefore, call into question the credibility of witnesses that supported the position that Wilson was not justified in killing an unarmed teen. It is the defense job to use audio/written testimony to discredit the witness not the prosecutions job.

Alizadeh's examination of witnesses, as in the instance of a detective (Volume 5, pgs. 18-20) in reference to why he had not heard the Ferguson Market call prior to hearing the Darren Wilson call, further supports the prosecution acting as defense attorneys on behalf of Darren Wilson.

McCulloch, Alizadeh and Whirley failed to give the Grand Jury any direction on what specific charges to consider for indictment. Though the Grand Jury is comprised of 12 lay people, his negligence left such knowledge and decisions up to them to sort out along with a quagmire of testimony and documents

Prosecutor's disregarded the lack of logic and credibility of Wilson's testimony including several indications that Michael Brown was not armed. An armed man would have used his own gun at the car, it would have been easier to retrieve his own gun rather than reach across Darren Wilson and awkwardly attempt to take his gun in a backwards position. If Wilson knew of the Ferguson robbery he would have known there was no mention of a weapon. None of the facial abrasions are consistent with having been beaten by a "demon". Multiple witnesses, including Wilson verified that Michael Brown was holding the Cigarettes through much of the confrontation at the car, and that Wilson was pulling Brown into the car and that Brown's hands were outside the car trying to pull away.

But for Wilson's false testimony that he knew of the Cigarette theft, the only reason there would have been for an "arrest" would have been Michael Brown walking down the middle of the street.

Initials

CPD

CB

Long

CF

RF

MB

nmw

Prosecutors have put millions of people in jail based upon the legal principle that "ignorance of the law is no excuse". Yet they claim that they were justified in being ignorant of Tennessee v Garner.

Given the totality of the actions of McCulloch, Alizadeh and Whirley in this matter it is obvious that each not only failed to vigorously represent their client(s), the State of Missouri and its residents, but their actions or lack thereof were so egregious that they suggest a complete abrogation of duty by acting as defense council rather than prosecutors in this case.

RULE 4-3.8: SPECIAL RESPONSIBILITIES OF A PROSECUTOR

The prosecutor in a criminal case shall:

(f) except for statements that are necessary to inform the public of the nature and extent of the prosecutor's action and that serve a legitimate law enforcement purpose, refrain from making extrajudicial comments that have a substantial likelihood of heightening public condemnation of the accused, and exercise reasonable care to prevent investigators, law enforcement personnel, employees, or other persons assisting or associated with the prosecutor in a criminal case from making an extrajudicial statement that the prosecutor would be prohibited from making under Rule 4-3.6 or this Rule 4-3.8.

COMMENT

[1] A prosecutor has the responsibility of a minister of justice and not simply that of an advocate.

While the Missouri Supreme Court did not likely anticipate an instance where the prosecutor would act as defense counsel of the accused when writing this Rule, the spirit of the law would certainly apply. Throughout the entire process of reaching a determination of the Darren Wilson case, Bob McCulloch frequently made statements that had a "substantial likelihood of heightening public condemnation" of the victim. These actions heighten the damage done by the apparent violation of this Rule.

Considering that at all times referred to throughout the investigation and presentation of DW's case to the GJ, the Prosecutor and his team treated Michael Brown as the "defendant" this Rule should apply.

The prosecutor either knew or should have known about the recording of Michael Brown at Ferguson Market and had an ethical duty to prevent such prejudicial and inflammatory publicity.

RULE 4-3.4: FAIRNESS TO OPPOSING PARTY AND COUNSEL

A lawyer shall not:

Initials CB RA AmZ CA RW MB nmw

(a) unlawfully obstruct another party's access to evidence or unlawfully alter, destroy, or conceal a document or other material having potential evidentiary value. A lawyer shall not counsel or assist another person to do any such act;

(b) falsify evidence, counsel or assist a witness to testify falsely, or offer an inducement to a witness that is prohibited by law;

(c) knowingly disobey an obligation under the rules of a tribunal, except for an open refusal based on an assertion that no valid obligation exists;

(d) in pretrial procedure, make a frivolous discovery request or fail to make reasonably diligent effort to comply with a legally proper discovery request by an opposing party;

(e) in trial, allude to any matter that the lawyer does not reasonably believe is relevant or that will not be supported by admissible evidence, assert personal knowledge of facts in issue except when testifying as a witness, or state a personal opinion as to the justness of a cause, the credibility of a witness, the culpability of a civil litigant, or the guilt or innocence of an accused; or

(f) request a person other than a client to refrain from voluntarily giving relevant information to another party unless:

(1) the person is a relative or an employee or other agent of a client; and

(2) the lawyer reasonably believes that the person's interests will not be adversely affected by refraining from giving such information.

Evidence of Violation: McCulloch made numerous public statements regarding this case that reflected on the validity of Darren Wilson's statements (despite the numerous contradictions with even his own prior statements.) McCulloch also made public statements that cast Michael Brown in a negative light which thus could have negatively impacted the Grand Jury. Alizadeh and Whirley misplaced and mislabeled a number of documents and once the Transcript was released to the public, numerous pages were concealed.


RULE 4-3.5: IMPARTIALITY AND DECORUM OF THE TRIBUNAL

A lawyer shall not:

(a) seek to influence a judge, juror, prospective juror, or other official by means prohibited by law;

(d) engage in conduct intended to disrupt a tribunal.

Evidence of violation: *In Volume 8 page 11 -13 Alizadeh knowingly and persuasively discussed the protests, NAACP, and unrest in Ferguson which could bias the jurors*

Initials 

RULE 4-4.1: TRUTHFULNESS IN STATEMENTS TO OTHERS

In the course of representing a client a lawyer shall not knowingly:

- (a) make a false statement of material fact or law to a third person; or**
- (b) fail to disclose a material fact when disclosure is necessary to avoid assisting a criminal or fraudulent act by a client, unless disclosure is prohibited by Rule 4-1.6.**

Evidence of Violation: Volume 5 page 5-6, Misinformation presented to the Grand Jury September 16, 2014 at 8:35Am by Kathi Alizadeh.

RULE 4-5.2: RESPONSIBILITIES OF A SUBORDINATE LAWYER

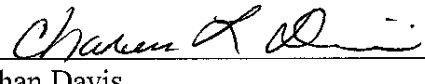
- (a) A lawyer is bound by the Rules of Professional Conduct notwithstanding that the lawyer acted at the direction of another person.**
- (b) A subordinate lawyer does not violate the Rules of Professional Conduct if that lawyer acts in accordance with a supervisory lawyer's reasonable resolution of an arguable question of professional duty.**

EVIDENCE OF VIOLATION: All violations referred to herein.

Respectfully Submitted.




Christi Griffin
Citizen of the State of Missouri



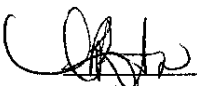
Chan Davis
Citizen of the State of Missouri



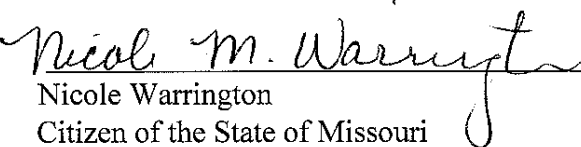
Melissa VanEster Bennett
Citizen of the State of Missouri



Rebecca B Frazier
Citizen of the State of Missouri



Tenille Rose Martin
Resident of the State of Missouri



Nicole Warrington
Citizen of the State of Missouri



Latonja Flowers
Citizen of the State of Missouri