

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

Associate Division _____

8 JUL 23 2009

STATE OF MISSOURI,)	
)	
Plaintiff,)	
)	
vs.)	Case No. _____
)	OCN#
)	11097-99
)	11097-99
LAURA D KIRKLAND,)	11025-99
Defendant.)	

State of Missouri)
) ss.
 County of Greene)

FELONY COMPLAINT

COUNT I

The Prosecuting Attorney of the County of Greene, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, in that on or between the 12th day of July, 2006, and the 12th day of July, 2008, in the County of Greene, State of Missouri, the defendant, LAURA D KIRKLAND, had deviate sexual intercourse with [REDACTED] (DOB [REDACTED] 1997), who was then less than twelve years old, to wit: by touching [REDACTED]'s [REDACTED] with her hand and/or mouth.

COUNT II

The Prosecuting Attorney of the County of Greene, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, in that on or between the 12th day of July, 2006, and the 12th day of July, 2008, in the County of Greene, State of Missouri, the defendant, LAURA D KIRKLAND, had deviate sexual intercourse with [REDACTED] (DOB [REDACTED] 1997), who was then less than twelve years old, to wit: by having [REDACTED] touch her [REDACTED] with his hand.

State v. LAURA D KIRKLAND

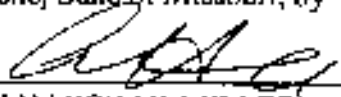
COUNT III

The Prosecuting Attorney of the County of Greene, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the felony of statutory rape in the first degree, punishable upon conviction under Section 566.032, RSMo, in that on or between the 12th day of July, 2006, and the 12th day of July, 2008, in the County of Greene, State of Missouri, the defendant, LAURA D KIRKLAND, had sexual intercourse with [REDACTED] (DOB [REDACTED] 1997), who was then less than twelve years old.

The facts that form the basis for this information and belief are contained in the attached probable cause statement concerning this matter, which statement is made a part hereof and is submitted herewith as a basis upon which this court may find the existence of probable cause for the issuance of the warrant.

WHEREFORE, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

DARRELL L. MOORE
Prosecuting Attorney of the County of
Greene, State of Missouri, by


AMI HARSHAD MILLER
Assistant Prosecuting Attorney
County of Greene, State of Missouri
Missouri Bar #57711

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SPRINGFIELD POLICE DEPARTMENT



PROBABLE CAUSE STATEMENT

Date: 07-23-08 Case #: 08-31455

1. Steve Schwind, a law enforcement officer, knowing that false statements on this form are punishable by law state as follows:

1. I have probable cause to believe that Laura D. Kirkland, W/P, DOB 11-28-82, SSN [REDACTED], committed one or more criminal offenses.

2. The following crime(s) happened on or between the dates of 06-12-2006 and 06-12-2008 at [REDACTED] in Springfield, Greene County, Missouri.

3. The facts supporting this belief are as follows:

On 07-14-08 Officer Erik Brown completed police report 08-31455 in reference to a past sexual assault involving [REDACTED] and his babysitter, Laura Kirkland. Connie Mansfield from the Greene County Children's Division scheduled an interview at the Child Advocacy Center for 07-21-08.

I attended the interview of [REDACTED] which was conducted by Micki Lane. During the interview [REDACTED] disclosed that his ex-babysitter, Laura Kirkland, made him touch her [REDACTED], and made him insert his fingers inside her [REDACTED]. She also touched his [REDACTED] with her hand, and performed oral sex on him. [REDACTED] described having sexual intercourse with Laura, and how he was scared when she would do this to him. [REDACTED] said this happened at her house when she would watch him, and it happened to him from his age of eight through the age of ten.

On 07-22-08 I spoke to Laura Kirkland at Police Headquarters. In a post Miranda interview, Laura admitted to sexual contact with [REDACTED], and said all of the contact happened when he was ten-years old. Laura told me she performed oral sex on [REDACTED] three times and had sexual intercourse with him two times. She said [REDACTED] touched her [REDACTED] about five times. All of this happened at Laura's address, [REDACTED] in Springfield.

The facts contained above are true.

Steve Schwind
Signature

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DSN

Investigator
Title