



NEWS RELEASE

GREENE COUNTY PROSECUTING ATTORNEY

DAN PATTERSON

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1010 Boonville
Springfield, MO 65802

01/01/2021

FOR IMMEDIATE RELEASE

BOYFRIEND CHARGED IN NEW YEAR'S EVE DOUBLE MURDER

SPRINGFIELD, Mo. – Greene County Prosecuting Attorney Dan Patterson announces that Brandon Corbin King, 29, of Springfield, Missouri, has been charged today with two counts of first degree murder, one count of child abuse resulting in death, two counts of first degree assault, two counts of abuse of a child, and seven counts of armed criminal action. The charges announced today arise from the incident on December 31, 2020, at 2001 W. Scott Street, in which the defendant is alleged to have killed his girlfriend and one of her children and attempted to kill her two other children who were present in the home. The defendant is being detained in the Greene County Jail without bond.

Prosecutor Patterson is grateful to the neighbors whose quick actions saved the lives of two of the defendant's intended child victims and to the Springfield Police Department whose quick response resulted in the immediate arrest of the defendant as he attempted to flee the area.

Mr. Patterson cautions that the charges contained in the felony complaint are merely allegations and that the defendant is presumed innocent until and unless proven guilty in court.

Copies of the felony complaint, probable statement, and bond recommendation filed in this case are attached to this release. The Missouri Supreme Court ethics rules prohibit comments on the facts or investigation of this case beyond those contained in the felony complaint and probable cause statement that are part of the public record.

This case is being prosecuted by Prosecuting Attorney Dan Patterson. It is being investigated by the Springfield Police Department and Detective James Sweet is the lead investigator assigned to the case.

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

Associate Division ____

STATE OF MISSOURI,

Plaintiff,

vs.

BRANDON CORBIN KING,

Defendant.

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Case No. 2131-CR00001

OCN#

PA File No. 077441398

FELONY COMPLAINT

COUNT I

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 558.011, RSMo, in that on or about December 31, 2020, in the County of Greene, State of Missouri, the defendant after deliberation, knowingly caused the death of DM by stabbing and cutting him.

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, under Sections 558.016 and 557.036, RSMo, in that he has pleaded guilty to two or more felonies committed at different times. The felonies are as follows:

1. On or about February 18, 2011, defendant pleaded guilty to the felony of first-degree robbery in the Circuit Court of Greene County, Missouri, case number 1031-CR00103-01.
2. On or about February 18, 2011, defendant pleaded guilty to the felony of second-degree burglary in the Circuit Court of Greene County, Missouri, case number 1031-CR00108-01.
3. On or about December 18, 2015, defendant pleaded guilty to the felony of endangering a correctional employee by causing a person to come in contact with bodily fluids, in the Circuit Court of Texas County, Missouri, case number 15TE-CR00294.

COUNT II

The Prosecuting Attorney of the County of Greene, State of Missouri, 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 December 31, 2020, in the County of Greene, State of Missouri, the defendant committed the felony of murder 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 murder in the first degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

COUNT III

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 568.060, RSMo, committed the class A felony of abuse of a child, punishable upon conviction under Section 558.011 and 568.060.5(2), RSMo, in that on or about December 31, 2020, in the

County of Greene, State of Missouri, the defendant was eighteen years of age or older, and knowingly caused DM, a child less than eighteen years of age, to suffer physical injury as a result of abuse by stabbing and cutting him and the injury inflicted was serious physical injury on DM, and DM died as a result of injuries sustained from this conduct.

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

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, under Sections 558.016 and 557.036, RSMo, in that he has pleaded guilty to two or more felonies committed at different times. The felonies are as follows:

1. On or about February 18, 2011, defendant pleaded guilty to the felony of first-degree robbery in the Circuit Court of Greene County, Missouri, case number 1031-CR00103-01.
2. On or about February 18, 2011, defendant pleaded guilty to the felony of second-degree burglary in the Circuit Court of Greene County, Missouri, case number 1031-CR00108-01.
3. On or about December 18, 2015, defendant pleaded guilty to the felony of endangering a correctional employee by causing a person to come in contact with bodily fluids, in the Circuit Court of Texas County, Missouri, case number 15TE-CR00294.

COUNT IV

The Prosecuting Attorney of the County of Greene, State of Missouri, 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 December 31, 2020, in the County of Greene, State of Missouri, the defendant committed the felony of abuse of a child charged in Count III, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of abuse of a child by, with and through, the knowing use, assistance and aid of a dangerous instrument.

COUNT V

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.050, RSMo, committed the class A felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about December 31, 2020, in the County of Greene, State of Missouri, the defendant stabbed and cut AM, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of victim, and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on AM.

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

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, under Sections 558.016 and 557.036, RSMo, in that he has pleaded guilty to two or more felonies committed at different times. The felonies are as follows:

1. On or about February 18, 2011, defendant pleaded guilty to the felony of first-degree robbery in the Circuit Court of Greene County, Missouri, case number 1031-CR00103-01.
2. On or about February 18, 2011, defendant pleaded guilty to the felony of second-degree burglary in the Circuit Court of Greene County, Missouri, case number 1031-CR00108-01.

3. On or about December 18, 2015, defendant pleaded guilty to the felony of endangering a correctional employee by causing a person to come in contact with bodily fluids, in the Circuit Court of Texas County, Missouri, case number 15TE-CR00294.

COUNT VI

The Prosecuting Attorney of the County of Greene, State of Missouri, 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 December 31, 2020, in the County of Greene, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count V, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

COUNT VII

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 568.060, RSMo., committed the class A felony of abuse of a child, punishable upon conviction under Sections 558.011 and 568.060.5(2) RSMo., in that on or about December 31, 2020, in the County of Greene, State of Missouri, the defendant was eighteen years of age or older, and knowingly caused AM, a child less than eighteen years of age, to suffer physical injury as a result of abuse by stabbing and cutting her and, the injury inflicted was serious physical injury on AM.

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, under Sections 558.016 and 557.036, RSMo, in that he has pleaded guilty to two or more felonies committed at different times. The felonies are as follows:

1. On or about February 18, 2011, defendant pleaded guilty to the felony of first-degree robbery in the Circuit Court of Greene County, Missouri, case number 1031-CR00103-01.
2. On or about February 18, 2011, defendant pleaded guilty to the felony of second-degree burglary in the Circuit Court of Greene County, Missouri, case number 1031-CR00108-01.
3. On or about December 18, 2015, defendant pleaded guilty to the felony of endangering a correctional employee by causing a person to come in contact with bodily fluids, in the Circuit Court of Texas County, Missouri, case number 15TE-CR00294.

COUNT VIII

The Prosecuting Attorney of the County of Greene, State of Missouri, 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 December 31, 2020, in the County of Greene, State of Missouri, the defendant committed the felony of abuse of a child charged in Count VII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of abuse of a child by, with and through, the knowing use, assistance and aid of a dangerous instrument.

COUNT IX

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 558.011, RSMo, in that on or about December 31, 2020, in the County of Greene,

State of Missouri, the defendant after deliberation, knowingly caused the death of SP by stabbing and cutting her.

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, under Sections 558.016 and 557.036, RSMo, in that he has pleaded guilty to two or more felonies committed at different times. The felonies are as follows:

1. On or about February 18, 2011, defendant pleaded guilty to the felony of first-degree robbery in the Circuit Court of Greene County, Missouri, case number 1031-CR00103-01.
2. On or about February 18, 2011, defendant pleaded guilty to the felony of second-degree burglary in the Circuit Court of Greene County, Missouri, case number 1031-CR00108-01.
3. On or about December 18, 2015, defendant pleaded guilty to the felony of endangering a correctional employee by causing a person to come in contact with bodily fluids, in the Circuit Court of Texas County, Missouri, case number 15TE-CR00294.

COUNT X

The Prosecuting Attorney of the County of Greene, State of Missouri, 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 December 31, 2020, in the County of Greene, State of Missouri, the defendant committed the felony of murder in the first degree charged in Count IX, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the first degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

COUNT XI

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.050, RSMo, committed the class A felony of assault in the first degree, punishable upon conviction under Section 558.011, RSMo, in that on or about December 31, 2020, in the County of Greene, State of Missouri, the defendant stabbed and cut EP, and such conduct was a substantial step toward the commission of the offense of assault in the first degree of EP, and was done for the purpose of committing such assault, and in the course thereof inflicted serious physical injury on EP.

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

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, under Sections 558.016 and 557.036, RSMo, in that he has pleaded guilty to two or more felonies committed at different times. The felonies are as follows:

1. On or about February 18, 2011, defendant pleaded guilty to the felony of first-degree robbery in the Circuit Court of Greene County, Missouri, case number 1031-CR00103-01.
2. On or about February 18, 2011, defendant pleaded guilty to the felony of second-degree burglary in the Circuit Court of Greene County, Missouri, case number 1031-CR00108-01.
3. On or about December 18, 2015, defendant pleaded guilty to the felony of endangering a correctional employee by causing a person to come in contact with bodily fluids, in the Circuit Court of Texas County, Missouri, case number 15TE-CR00294.

COUNT XII

The Prosecuting Attorney of the County of Greene, State of Missouri, 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 December 31, 2020, in the County of Greene, State of Missouri, the defendant committed the felony of assault in the first degree charged in Count XI, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of assault in the first degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

COUNT XIII

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of in violation of Section 568.060, RSMo., committed the class A felony of abuse of a child, punishable upon conviction under Sections 558.011 and 568.060.5(2) RSMo., in that on or about December 31, 2020, in the County of Greene, State of Missouri, the defendant was eighteen years of age or older, and knowingly caused EP, a child less than eighteen years of age, to suffer physical injury as a result of abuse by stabbing and cutting her and, the injury inflicted was serious physical injury on EP.

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, under Sections 558.016 and 557.036, RSMo, in that he has pleaded guilty to two or more felonies committed at different times. The felonies are as follows:

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2. On or about February 18, 2011, defendant pleaded guilty to the felony of second-degree burglary in the Circuit Court of Greene County, Missouri, case number 1031-CR00108-01.
3. On or about December 18, 2015, defendant pleaded guilty to the felony of endangering a correctional employee by causing a person to come in contact with bodily fluids, in the Circuit Court of Texas County, Missouri, case number 15TE-CR00294.

COUNT XIV

The Prosecuting Attorney of the County of Greene, State of Missouri, 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) (571.015.2) (571.015.3), RSMo, in that on or about December 31, 2020, in the County of Greene, State of Missouri, the defendant committed the felony of abuse of a child charged in Count XIII, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of abuse of a child by, with and through, the knowing use, assistance and aid of a dangerous instrument.

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.

A handwritten signature in dark ink, reading "Dan Patterson". The signature is written in a cursive, flowing style with a large initial "D".

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SPRINGFIELD POLICE DEPARTMENT



PROBABLE CAUSE STATEMENT

Date: 12/31/2020 Case #: SPD201231044201

I, JAMES SWEET, 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 BRANDON CORBIN KING, White/Male, DOB [REDACTED]/1991, committed one or more criminal offenses.
2. The following crime(s) happened on 2020/12/31 12:45 - 2020/12/31 12:53 at 2001 W SCOTT ST in Springfield, Greene County, Missouri.
3. The facts supporting this belief are as follows:

On 12/31/2020, officers of the Springfield Police Department responded to 2001 W. Scott in reference a 911 call where the caller, identified as HL stated a juvenile female was at the location with her throat slit. Officers were advised there was a report of a probable deceased adult female in the living room of the residence and a report of a juvenile male still in the house whose location was unknown. During the call, the caller handed the phone to a male, identified as CA, who stated he had kicked in the front door and a white male with a bald head wearing a white shirt, who was already in the house, fled further into it and could still be inside. The male caller said he removed a 2nd juvenile female from the residence at that time.

Upon arrival, Cpl. H. Millirons observed a female covered in blood, identified as AM (14 years of age), being tended to by HL and CA on the porch of 2007 W. Scott (which is one house to the west of 2001 W. Scott). Cpl. Millirons quickly spoke to CA, and CA advised he went to 2001 W. Scott after AM exited with her throat sliced. CA stated he kicked open the locked front door, and observed a heavily bleeding adult female, identified as SP (32 years of age), laying on the living room floor. CA said he saw a white male with a bald head run towards the back of the house. CA stated he grabbed a juvenile female, identified as EP (7 years of age), and ran back to 2007 W. Scott. CA advised he knew there was a juvenile male inside the residence but he didn't know his location yet. Cpl. Millirons and Ofc. M. Keller then made exigent entry into 2001 W. Scott. Cpl. Millirons observed SP, who was deceased, on the living room floor. During the search of the residence, Cpl. Millirons located the deceased juvenile male, identified as DM (13 years of age) in the northeast bedroom of the residence. Cpl. Millirons noted the back sliding glass door was open and there were blood stains on the door. The suspect was not located at that time. Cpl. Millirons observed a bloody knife laying on a chair in the living room.

As noted above, SP and DM were located deceased in the residence. SP was laying on her side on the living room floor, and there was a large amount of blood encircling her head and the area around her. SP's injuries were not readily apparent due to the positioning of her body. DM was located in the northeast bedroom of the residence, and he appeared to have suffered significant injuries to his neck and other areas of his body. AM was reported to have suffered a significant sharp force injury to her neck, a laceration to her right hand, and a laceration to her left elbow. EP was reported to

have suffered a cut to her right hand, a significant laceration to the top of her head, a significant laceration to her right collarbone area, a wound to the area behind her right ear, a laceration to her left ear, an apparent stab wound to the lower back center of her neck, and a small cut to her right stomach area.

Before being transported to the hospital, EP was asked by Cpl. A. Cassity who hurt her, and she stated "Brandon." Cpl. Cassity did not ask her any further questions.

During an interview with Det. O. Hoedel, HL stated she was with CA when they arrived at 2007 W. Scott. HA said when they arrived they saw a juvenile female, AM, covered in blood pounding on the front door of 2007 W. Scott. HL approached AM and applied pressure to a deep 2-inch-long laceration on her throat. AM told HL somebody attacked her mother, and she woke up to the person attacking her. HL asked AM who did it, and she said her "step-dad." HL then witnessed CA kick open the front door of 2001 W. Scott and yell "leave the kid alone." After CA kicked open the door, a 2nd juvenile female, EP, came out of the residence. HL said EP told her that her brother, DM, was still in the house. HL said officers arrived soon after.

During an interview with Det. O. Hoedel, CA stated he arrived at 2007 W. Scott with HL, and as he was pulling into the driveway he observed AM covered in blood walking to the front door of 2007 W. Scott. CA asked AM if she was ok, and AM told him there was somebody attacking her mother and he had a knife. AM also advised her sister was still in the house. CA ran to the front door and he heard a female screaming inside. CA then kicked the door in after knocking loudly. Once the door was open, CA observed an older female on the floor with blood on her, and a juvenile female, EP, standing next to her looking at her. CA said he then observed a white male, with a buzzed haircut, in his mid-thirties, and wearing a white t-shirt, standing in a hallway. The male looked at him and then went towards the back of the house and out of sight. CA grabbed EP and took her outside. HL told CA there was still a juvenile male in the house, and he tried to yell for the male from the front door. CA stood with EP after the incident and EP told him "Brandon King" was the person who attacked them and he was her dad.

Cpl. C. Lightwine responded to the scene as well, and while on scene, she spoke briefly with AM. AM told her Brandon King was the person who attacked her.

While in the area looking for the suspect, Cpl. K. Hall observed a white male running westbound in the area of Lynn and Brown wearing a gray hoodie. Cpl. Hall was approached by an area resident who advised him the male Cpl. Hall saw had come from his back yard (1410 N. Brown) and no one should be back there. Cpl. Hall went after the male who was walking north on Brown, and while doing so, he was updated by the dispatcher the suspect was now wearing a gray hoodie and had attempted to steal a car at 2407 W. Lynn. When Cpl. Hall got close to the male, he yelled at him and told him to stop. The male, identified as Brandon King, put his hands in the air and turned towards Cpl. Hall. Cpl. Hall saw King's left hand was covered by his hoodie sleeve. King laid down on the ground, and he told Cpl. Hall he did not have a weapon. Cpl. Hall asked King where the weapon was at and King answered it was back at the house. King then told him both of his hands were cut and he couldn't remove his left hand from his sleeve. King was then placed in handcuffs and he confirmed his first name was Brandon. King refused to state his last name. Cpl. Hall observed King had blood on all of his clothing, both hands, and his head.

During a post-Miranda interview, Brandon told me he currently resided at 2001 W. Scott, and he lived with SP, EP, SP's mother, and 4th individual. Brandon also told me SP's other kids, among

them AM and DM, were staying at the house during the winter break. I asked Brandon what happened today, and he first told me he had a headache, pressure to his head, and he was spacing out. I asked Brandon what happened after he was spacing out, and he said he had confusion and couldn't see straight. Brandon eventually told me he would tell me what happened if he could smoke a cigarette. I asked Brandon if he would give me a summary of what happened, and he told me "I'm guilty." Brandon told me he was guilty of "the crime that was committed at 2001 W. Scott." I asked Brandon what happened at the address, and he said, "involving a knife." Brandon admitted the crime was committed against "a 13-year-old named DM, AM that's 14, SP my fiancé when she ran out, and I hopefully didn't get EP." Brandon told me he decided to "carry it out", and he clarified that meant "the stabbing." I asked Brandon if he stabbed SP, and he said "yeah." I asked Brandon if he stabbed AM, and he said "yeah." I asked Brandon if he stabbed DM, and he said "yeah." I asked Brandon if he stabbed EP, and he said, "I don't remember."

As the interview progressed, Brandon admitted he decided on 12/30/2020 to kill everyone in the house because he was currently facing a new charge in Christian County and he was going to flee the state. Brandon said he knew about some money at the house he could steal from SP's mother, and he wanted to steal SP's mother's van. Brandon decided to kill everyone because he didn't want to leave any witnesses to the theft. Brandon stated when a family friend left the house he decided it was the right time to do it since everyone was asleep. Brandon then admitted to stabbing DM multiple times in a back room. Brandon admitted to stabbing AM while she was asleep in the bed in a bedroom and the commotion from that attack woke SP. Brandon said SP came out of her room while he was attacking AM, so he attacked her in the living room. Brandon said while he was stabbing SP, EP tried to get in the way so he swung the knife at her a couple times and he thought he hit her with the knife. Brandon said while he was attacking SP and EP in the living room he heard pounding on the door from CA, and he could hear CA yelling for him to stop and not hurt the kids. Brandon said he threw the knife he used, which he described as an all silver knife, down in either the living room or the kitchen. Brandon said CA kicked open the front door and pointed a gun at him so he ran off. Brandon said he ran from the house and went to an abandoned house on Division. Brandon said he found clothing there and put it on so he could walk around without all the blood on his clothing being so noticeable. Brandon said he was walking down the street when he was contacted by the police and he confirmed Cpl. Halls account of their encounter.

Brandon told me if CA had not interrupted the incident he would have continued to attack EP with the intent to kill her.

I am requesting that an arrest warrant be issued because (complete at least one of the following):

1. I have reasonable grounds to believe the defendant will not appear upon a summons based on the facts stated above and the following information:

King stated one of his motives for committing the crime was his need to flee the state to avoid a criminal charge in Christian County, MO.

☐ Not Applicable

2. I have reasonable grounds to believe the defendant poses a danger to a crime victim, the community, or any other person based on the facts stated above and the following information:

Due to the facts and circumstances involved in this case, I believe King presents a continued threat to the surviving witnesses as one of his goals in the crime was to get rid of any witnesses to the planned theft.

☐ Not Applicable

The facts contained above are true to the best of my information and belief.

/s/ James Sweet

1547

Detective

Signature

DSN

Title

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

STATE OF MISSOURI,)	
Plaintiff,)	
)	
)	
vs.)	Case No. 2131-CR00001
)	
BRANDON CORBIN KING)	OCN#
)	
Defendant.)	

STATE'S REQUEST FOR ARREST WARRANT AND TO DETAIN PENDING TRIAL

COMES NOW, Plaintiff, State of Missouri, pursuant to the Missouri Constitution, Article I, Section 32.2; Sections 544.457 and 544.676, RSMo; and Missouri Supreme Court Rules 22.04, 22.05, and 33.01; and, based upon the probable cause statement filed contemporaneously herewith and incorporated by reference herein and the statements in support of request for conditions of release set out below, requests that the Court issue an arrest warrant and that defendant be detained pending trial. In support of the request for issuance of a warrant and to detain pending trial, Plaintiff further states:

1. Pursuant to Missouri Supreme Court Rule 22.04, the probable cause statement filed contemporaneously herewith and incorporated by reference herein provides sufficient facts to show that a crime has been committed and that there are reasonable grounds to believe the defendant will not appear upon a summons and/or that the defendant poses a danger to a crime victim, the community or any other person.
2. Pursuant to Missouri Supreme Court Rule 22.04(d); the Missouri Constitution, Article I, Section 32.2; Sections 544.457 and 544.676, RSMo; and Missouri Supreme Court Rule 33.01(d); and based on the probable cause statement filed herein, and the following additional available

information, the State requests the Court find there is clear and convincing evidence that no combination of nonmonetary conditions and monetary conditions will secure the safety of the community or other person, including but not limited to the crime victim(s) and witness(es) and that the Court order that the defendant be detained pending trial or other disposition:

Defendant is on parole for robbery in the first degree a dangerous felony and is a prior and persistent offender. While in prison for that offense the defendant committed the felony offense of endangering a correctional employee. Since being released from prison on parole the defendant has committed and been charged with the felony of forgery in Christian County case number 19CT-CR02233-01. In this case, the defendant intended to steal money and a van from the house of the hospitalized mother of his girlfriend in order to flee from the Christian County charges and stated the motive for the killings and attempted killings herein was to eliminate the victims as witnesses.

3. Alternatively, should the Court not order the Defendant detained pending trial, Plaintiff requests that the Court,

a. Impose the conditions of release required by Missouri Supreme Court Rule 33.01(b) as set out in Exhibit A to Arrest Warrant,

b. Find that additional conditions of release set out in Exhibit A to Arrest Warrant are necessary to secure the appearance of the Defendant at trial, or any other stage of the criminal proceeding, or the safety of the community or other person, including but not limited to crime victims and witnesses, and

c. Set bond upon a finding that non-monetary conditions alone will not secure the appearance of the defendant at trial, or any other stage of the criminal proceedings, or the safety

of the community or other person including but not limited to the crime victim(s) and witness(es) and that security or supervision by a surety is necessary to ensure the defendant's appearance and compliance with the Court's conditions of release.

WHEREFORE, Plaintiff prays that the Court issue an arrest warrant for the defendant and that defendant be detained pending trial and for such other and further relief as the Court finds just and proper.

Respectfully submitted,

A handwritten signature in dark ink, reading "Dan Patterson". The signature is written in a cursive, flowing style with a large initial "D".

Dan Patterson
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