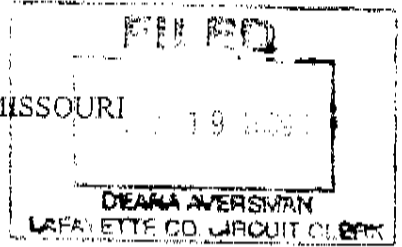


IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSOURI
ASSOCIATE DIVISION



COMPLAINT

STATE OF MISSOURI

Plaintiff,

vs.

Jared Leroy Mohler
[REDACTED]
Columbia, MO

Defendant.

) PA File No. 107012230
)
)
) Case No.
) OCN:
)
) W/M DOB: [REDACTED] 1961
) 604; 295
) SSN:
)

COUNT: 1

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 568.080, RSMo, committed the class C felony of use of a child in a sexual performance, punishable upon conviction under Section(s) 568.080, RSMo, in that between May 1, 1986 and September 1, 1986, in the County of Lafayette, State of Missouri, the defendant, acting in concert with another, knowingly induced [REDACTED], a child less than seventeen years old, to engage in a sexual performance, knowing the character and content thereof, in which [REDACTED] had sexual contact with a horse.

Charge Code: 2610099.0

RANGE OF PUNISHMENT: Class A Felony -- 10 to 30 years or life imprisonment in the Missouri Department of Corrections. Class B Felony -- 5 to 15 years in the Missouri Department of Corrections. Class C Felony -- 1 to 7 years in the Missouri Department of Corrections, or 1 year in the County Jail and/or up to a \$5,000.00 fine. Class D Felony -- 1 to 4 years in the Missouri Department of Corrections, or 1 year in the County Jail and/or up to a \$5,000.00 fine

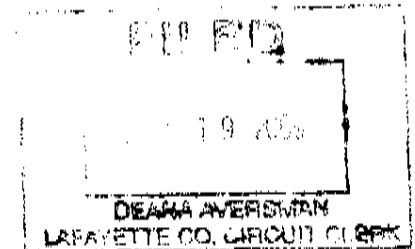
The facts that form the basis for this information and belief are contained in the attached statement(s) of facts concerning this matter, which statement(s) are made a part hereof and are submitted herewith as a basis upon which this court may find the existence of probable cause for the issuance of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

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

KELLIE WINGATE RITCHIE, #36569
Prosecuting Attorney
County of Lafayette

PROBABLE CAUSE STATEMENT FORM

Date: November 18, 2009



I, *Cynthia L. Schroer*, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that, Jared Leroy Mohler, [REDACTED] 1961; W/M
SSN: [REDACTED] Listed Address: [REDACTED] Columbia, MO. Physical
Identifiers: 6' 04" -- 295 lbs.
2. **The facts supporting this belief are as follows:**

The Lafayette County Sheriff's Department was contacted in August of 2009 by a Detective with the Independence Police Department with information of criminal activity perpetrated on children under the age of 12 at a location identified as [REDACTED] Bates City, Missouri, Lafayette County. The reports provided by the Independence detective indicated that at least five of the Mohler children reported sexual abuse perpetrated by several Mohler men. The properties were owned by Burrell Edward Mohler, Sr., during the periods of time that abuse is alleged.

Upon receipt of this information, Lafayette County investigators began reviewing all existing reports made by the victims and began contacting several victims listed in the reports. Due to the length of the alleged abuse, the number of defendants, the number of victims, and the fact that the victims now reside in various parts of the continent, the probable cause statements are being submitted to the Lafayette County Prosecutor as they are completed, beginning with the youngest known victims first.

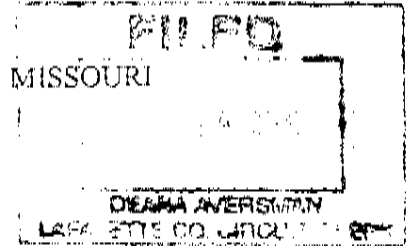
Burrell, Sr., fathered four sons identified as Burrell Edward Mohler, Jr., Jared L. Mohler, Roland N. Mohler and David A. Mohler. Burrell Jr. fathered six children; five girls and one boy. Burrell, Sr., also has a brother by the name of Darryl W. Mohler. The victims allege abuse by all four sons of Burrell, Sr., as well as Burrell, Sr., himself. Some of the victims also name Darryl W. Mohler as a perpetrator of child sexual abuse.

On or about November 12, 2009, [REDACTED], age [REDACTED], who was previously identified as one of the victims in this matter, gave a statement to Lafayette County law enforcement authorities regarding sexual abuse perpetrated by several Mohler men. [REDACTED] is one of the female children of Burrell, Jr., and was born in 1981. During this interview, she identified specific memories of abuse as outlined below along with time frames to the best of her memory. [REDACTED] knows that she was sexually abused by several Mohler men in different jurisdictions from approximately 5 years of age to approximately 12 years of age.

IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSOURI

ASSOCIATE DIVISION

COMPLAINT



STATE OF MISSOURI

Plaintiff,

vs.

Burrell Edward Mohler Jr.

Independence, MO

Defendant.

) PA File No. 107012229

)

)

) Case No.

) OCN:

)

) W/M DOB: [REDACTED] 1956

)

) SSN:

)

COUNT: I

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 566.030, RSMo, committed the class B felony of rape, punishable upon conviction under Section 566.030, RSMo, in that between May 1, 1986 and September 1, 1986, in the County of Lafayette, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED], a child less than fourteen years old to whom the defendant was not married.

Charge Code: 1102099.0

COUNT: II

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 568.080, RSMo, committed the class C felony of use of a child in a sexual performance, punishable upon conviction under Section(s) 568.080, RSMo, in that between May 1, 1986 and September 1, 1986, in the County of Lafayette, State of Missouri, the defendant, acting in concert with another, knowingly induced [REDACTED], a child less than seventeen years old, to engage in a sexual performance, knowing the character and content thereof, in which [REDACTED] had sexual contact with a horse.


Charge Code: 2610099.0

RANGE OF PUNISHMENT: Class A Felony -- 10 to 30 years or life imprisonment in the Missouri Department of Corrections. Class B Felony -- 5 to 15 years in the Missouri Department of Corrections. Class C Felony -- 1 to 7 years in the Missouri Department of Corrections, or 1 year in the County Jail and/or up to a \$5,000.00 fine. Class D Felony -- 1 to 4 years in the Missouri Department of Corrections, or 1 year in the County Jail and/or up to a \$5,000.00 fine

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts concerning this matter, which statement(s) are made a part hereof and are

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.


KELLIE WINGATE RITCHIE, #36569
Prosecuting Attorney
County of Lafayette

PROBABLE CAUSE STATEMENT FORM

Date: November 18, 2009

I, *Cynthia L. Schroer*, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that, Burrell Edward Mohler, Jr.: 02/28/1956; W/M SSN: ██████████ – Listed Address: ██████████ Independence, MO. Physical Identifiers: 5'11" – 250 lbs.
2. The facts supporting this belief are as follows:

The Lafayette County Sheriff's Department was contacted in August of 2009 by a Detective with the Independence Police Department with information of criminal activity perpetrated on children under the age of 12 at a location identified as ██████████, Bates City, Missouri, Lafayette County. The reports provided by the Independence detective indicated that at least five of the Mohler children reported sexual abuse perpetrated by several Mohler men. The properties were owned by Burrell Edward Mohler, Sr., during the periods of time that abuse is alleged.

Upon receipt of this information, Lafayette County investigators began reviewing all existing reports made by the victims and began contacting several victims listed in the reports. Due to the length of the alleged abuse, the number of defendants, the number of victims, and the fact that the victims now reside in various parts of the continent, the probable cause statements are being submitted to the Lafayette County Prosecutor as they are completed, beginning with the youngest known victims first.

Burrell, Sr., fathered four sons identified as Burrell Edward Mohler, Jr., Jared L. Mohler, Roland N. Mohler and David A. Mohler. Burrell Jr. fathered six children; five girls and one boy. Burrell, Sr., also has a brother by the name of Darryl W. Mohler. The victims allege abuse by all four sons of Burrell, Sr., as well as Burrell, Sr., himself. Some of the victims also name Darryl W. Mohler as a perpetrator of child sexual abuse.

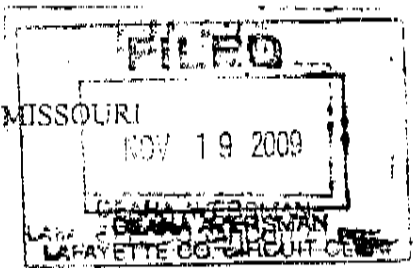
Report of ██████████

On or about November 12, 2009, ██████████, age ██████████ who was previously identified as one of the victims in this matter, gave a statement to Lafayette County law enforcement authorities regarding sexual abuse perpetrated by several Mohler men. ██████████ is one of the female children of Burrell, Jr., and was born in 1981. During this interview, she identified specific memories of abuse as outlined below along with time frames to the best of her memory. ██████████ knows that she was

IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSOURI

ASSOCIATE DIVISION

COMPLAINT



STATE OF MISSOURI

Plaintiff,

vs.

Burrell Edward Mohler Sr.
[REDACTED]
Independence, MO

Defendant.

) PA File No. 107012228
)
)
) Case No.
) OCN:
)
) W/M DOB: [REDACTED] 1932
)
) SSN: [REDACTED]
)

COUNT: I

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 566.030, RSMo, committed the class B felony of rape, punishable upon conviction under Section 566.030, RSMo, in that between May 1, 1986 and September 1, 1986, in the County of Lafayette, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED], a child less than fourteen years old, to whom the defendant was not married.

Charge Code: 1102099.0

COUNT: II

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 566.030, RSMo, committed the class B felony of rape, punishable upon conviction under Section 566.030, RSMo, in that between May 1, 1986 and September 1, 1986, in the County of Lafayette, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED], a child less than fourteen years old to whom the defendant was not married.

Charge Code: 1102099.0

COUNT: III

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 566.030, RSMo, committed the class B felony of rape, punishable upon conviction under Section 566.030, RSMo, in that between May 1, 1987 and September 1, 1987, in the County of Lafayette, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED], a child less than fourteen years old to whom the defendant was not married.

Charge Code: 1102099.0

COUNT: IV

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 566.030, RSMo, committed the class B felony of rape, punishable upon conviction under Section 566.030, RSMo, in that between May 1, 1987 and September 1, 1987, in the County of Lafayette, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED], a child less than fourteen years old to whom the defendant was not married.

Charge Code: 1102099.0

COUNT: V

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 566.030, RSMo, committed the class B felony of rape, punishable upon conviction under Section 566.030, RSMo, in that between January 1, 1987 and December 31, 1987, in the County of Lafayette, State of Missouri, the defendant knowingly had sexual intercourse with [REDACTED], a child less than fourteen years old to whom the defendant was not married.

Charge Code: 1102099.0

COUNT: VI

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 566.060, RSMo, committed the class B felony of sodomy, punishable upon conviction under Section 566.060, RSMo, in that between November 9, 1983 and November 8, 1985, in the County of Lafayette, State of Missouri, the defendant knowingly had deviate sexual intercourse with [REDACTED], a child less than fourteen years old to whom the defendant was not married.

Charge Code: 1108099.0

COUNT: VII

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 568.080, RSMo, committed the class C felony of use of a child in a sexual performance, punishable upon conviction under Section(s) 566.060, RSMo, in that between May 1, 1986 and September 1, 1986, in the County of Lafayette, State of Missouri, the defendant, acting in concert with another, knowingly induced [REDACTED], a child less than seventeen years old, to engage in a sexual performance, knowing the character and content thereof, in which [REDACTED] had sexual contact with a horse.

Charge Code: 2610099.0

COUNT: VIII

The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 568.080, RSMo, committed the class C felony of use of a child in a sexual performance, punishable upon conviction under Section(s) 568.080, RSMo, in that between January 1, 1987 and December 31, 1987, in the County of Lafayette, State of Missouri, the defendant, knowingly induced [REDACTED], a child less than seventeen years old, to engage in a sexual performance, knowing the character and content

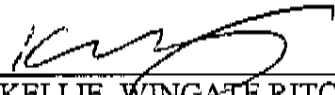
thereof, in which defendant directed [REDACTED] to engage in sexual contact with more than one minor child.

Charge Code: 2610099.0

RANGE OF PUNISHMENT: Class A Felony -- 10 to 30 years or life imprisonment in the Missouri Department of Corrections. Class B Felony -- 5 to 15 years in the Missouri Department of Corrections. Class C Felony -- 1 to 7 years in the Missouri Department of Corrections, or 1 year in the County Jail and/or up to a \$5,000.00 fine. Class D Felony -- 1 to 4 years in the Missouri Department of Corrections, or 1 year in the County Jail and/or up to a \$5,000.00 fine

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts concerning this matter, which statement(s) are made a part hereof and are 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.

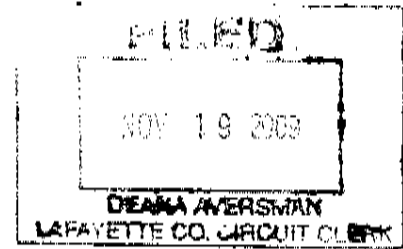


KELLIE WINGATE RITCHIE, #36569
Prosecuting Attorney
County of Lafayette

COPY

PROBABLE CAUSE STATEMENT FORM

Date: November 18, 2009



I, *Cynthia L. Schroer*, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that, Burrell Edward Mohler, Sr.; DOB: ██████████ 1932; W/M SSN: ██████████ - Listed Address: ██████████ Independence, Missouri.
2. **The facts supporting this belief are as follows:**

The Lafayette County Sheriff's Department was contacted in August of 2009 by a Detective with the Independence Police Department with information of criminal activity perpetrated on children under the age of 12 at a location identified as ██████████ Bates City, Missouri, Lafayette County. The reports provided by the Independence detective indicated that at least five of the Mohler children reported sexual abuse perpetrated by several Mohler men. The properties were owned by Burrell Edward Mohler, Sr., during the periods of time that abuse is alleged.

Upon receipt of this information, Lafayette County investigators began reviewing all existing reports made by the victims and began contacting several victims listed in the reports. Due to the length of the alleged abuse, the number of defendants, the number of victims, and the fact that the victims now reside in various parts of the continent, the probable cause statements are being submitted to the Lafayette County Prosecutor as they are completed, beginning with the youngest known victims first.

Burrell, Sr., fathered four sons identified as Burrell Edward Mohler, Jr., Jared L. Mohler, Roland N. Mohler and David A. Mohler. Burrell Jr. fathered six children; five girls and one boy. Burrell, Sr., also has a brother by the name of Darryl W. Mohler. The victims allege abuse by all four sons of Burrell, Sr., as well as Burrell, Sr., himself. Some of the victims also name Darryl W. Mohler as a perpetrator of child sexual abuse.

Report of A.J.A.:

On or about November 12, 2009, ██████████, age 28, who was previously identified as one of the victims in this matter, gave a statement to Lafayette County law enforcement authorities regarding sexual abuse perpetrated by several Mohler men. ██████████ is one of the female children of Burrell, Jr., and was born in 1981. During this interview, she identified specific memories of abuse as outlined below along with time frames to the best of her memory. ██████████ knows that she was