

IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSOURI
ASSOCIATE DIVISION

COMPLAINT

STATE OF MISSOURI

Plaintiff,

vs.

Roland Neil Mohler

Bates City, MO 64011

Defendant.

) PA File No. [REDACTED]

)

)

) Case No.

) OCN:

)

) W/ M DOB: [REDACTED]/1962

)

) SSN:

)

COUNT: I

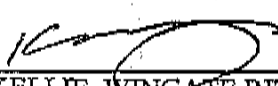
The Prosecuting Attorney for the County of Lafayette, State of Missouri, upon information and belief, charges the defendant in violation of Section 568.080, RSMo, committed the class C felony of use of a child in a sexual performance, punishable upon conviction under Section(s) 568.080, RSMo, in that between March 1, 1988 and March 21, 1995, 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 a dog was manipulated to have sexual contact with [REDACTED].

Charge Code: 2220599.0

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 3, 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, Roland Neil Mohler; DOB: [REDACTED]/1962; W/M SSN: [REDACTED] - Listed Address: [REDACTED], MO 64011
Physical Identifiers: 6'02" - 350 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. This property was purchased by Burrell Edward Mohler, Sr. on March 22, 1974. It was then purchased by his son, Burrell Edward Mohler, Jr. on July 19, 1995.

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. The six children of Burrell Jr. have now approached authorities with information alleging abuse by all four sons of Burrell, Sr. as well as Burrell, Sr. himself.

On October 29, 2009, I interviewed [REDACTED], age 26 who was identified as one of the victims in this matter. [REDACTED] is one of the female children of Burrell, Jr. and was born in 1983. She had suppressed many of the memories of abuse perpetrated on her as well as her siblings and is very fearful of her grandfather, father and uncles. During this interview, she identified 8 specific memories of abuse and a 9th that was perpetrated on her brother that she was forced to watch. The act perpetrated against her brother would also have been during the time frame listed below. She has many memories of abuse, but some of the abuse occurred in other jurisdictions in the State of Missouri as well as another State. [REDACTED] knows that all of these events took place prior to her turning 12 years of age and believes that most occurred from age 5 through 11 (March 1, 1988 through March 21, 1995. She became pregnant and was made to have an abortion at age 11 1/2. She doesn't remember any sexual abuse after that date. The abuse that occurred in Lafayette County specific to Roland Mohler is outlined below.

[REDACTED]