

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

COMPREHENSIVE HEALTH OF)
PLANNED PARENTHOOD)
GREAT PLAINS, et al.)
)
Plaintiffs,)
)
v.)
)
DR. RANDALL WILLIAMS, et al.,)
)
Defendants.)

Case No. 2:16-cv-04313-HFS

ANSWER OF DEFENDANTS HAWLEY AND WILLIAMS

Defendants Attorney General Joshua Hawley and Director Dr. Randall Williams, for their answer to Plaintiffs' Complaint state as follows:

Defendants deny each and every allegation in Plaintiffs' Complaint, unless expressly admitted, and then only to the extent of the referenced response. Any factual averment admitted is limited to the fact itself and does not extend to any conclusions, characterizations, implications, or speculation contained therein or in the Complaint as a whole. Defendants also specifically deny any pseudo-allegations contained in headings, prayers for relief, or unnumbered paragraphs.

“I. Preliminary Statement”

1. Paragraph 1 of Plaintiffs’ Complaint contains allegations that are in the nature of a prayer for relief, and contains legal conclusions and arguments that Defendants are not required to admit or deny. Sections 197.200, 197.215, 188.080, and 188.027 of the Missouri Revised Statutes, and Mo. Code Regs. tit. 19, §30-30.060 speak for themselves; Defendants deny all allegations of Paragraph 1 not in conformance with the statutes or regulation. To the extent that the final sentence of Paragraph 1 contains legal characterizations concerning Missouri’s ASC and hospital privilege requirements, Defendants deny the same. *Whole Women’s Health v. Hellerstedt*, 136 S.Ct. 2292 (2016) speaks for itself. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 1 of Plaintiffs’ Complaint.

2. Defendants admit that currently there is only one licensed abortion facility located in Missouri. Defendants deny the allegations contained in the third sentence of Paragraph 2 of Plaintiffs’ Complaint. Defendants are without sufficient knowledge or information to form a belief as to the truth of the remaining allegations contained in Paragraph 2 of Plaintiffs’ Complaint and therefore deny the same.

3. Defendants are without sufficient knowledge or information to

form a belief as to the truth of the allegations contained in the first sentence of Paragraph 3 of Plaintiffs' Complaint, and therefore deny the same. Defendants deny the allegation that Plaintiff Comprehensive Health of Planned Parenthood Great Plains is unable to provide abortion services in Kansas City because of the ASC and hospital privilege requirements. Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained in the second sentence of Paragraph 3 of Plaintiffs' Complaint, and therefore deny the same. Defendants deny the remaining allegations contained in Paragraph 3 of Plaintiffs' Complaint.

4. Paragraph 4 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. To the extent that Paragraph 4 contains factual allegations, Defendants deny the same. To the extent a response is required, Defendants deny the remaining allegations contained in Paragraph 4 of Plaintiffs' Complaint.

“II. Jurisdiction and Venue”

5. Defendants admit the allegations contained in Paragraph 5 of Plaintiffs' Complaint.

6. Paragraph 6 of Plaintiffs' Complaint contains legal conclusions and assertions of law that Defendants are not required to admit or deny. To

the extent a response is required, Defendants deny the remaining allegations contained in Paragraph 6 of Plaintiffs' Complaint.

7. Defendants admit that the Western District of Missouri is an appropriate venue. Defendants admit that, in their official capacities, they reside in the Central Division of the Western District of Missouri.

“III. Parties”

“A. Plaintiffs”

8. Defendants admit the allegations contained in the first sentence of Paragraph 8 of Plaintiffs' Complaint. Defendants admit that Plaintiff Comprehensive Health's predecessor, Planned Parenthood of Kansas and Mid-Missouri, provided abortions in Columbia and Kansas City in the past at the Brous Center and Columbia Center locations. Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations that Plaintiff Comprehensive Health provides abortion services at two health centers in Kansas and one in Oklahoma, as well as the allegations contained in the third sentence of Paragraph 8, and therefore deny the same. The final sentence of Paragraph 8 is an assertion of law that Defendants are not required to admit or deny.

9. Defendants admit the allegations contained in the first sentence of Paragraph 9 of Plaintiffs' Complaint. Defendants admit that RHS operates

a licensed abortion facility ASC in St. Louis, Missouri, but are without sufficient knowledge or information to form a belief as to the truth of the allegation that RHS operates a health center in Fairview Heights, Illinois. Defendants are without sufficient knowledge or information to form a belief as to the truth of the remaining factual allegations contained in Paragraph 9 of Plaintiffs' Complaint. The final sentence of Paragraph 9 is an assertion of law that Defendants are not required to admit or deny.

10. Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained in the first two sentences of Paragraph 10 of Plaintiffs' Complaint. The final sentence of Paragraph 10 is an assertion of law that Defendants are not required to admit or deny.

“B. Defendants”

11. Defendants deny that Peter Lyskowski is the Director of DHSS, in that Dr. Randall Williams became the Director of DHSS on March 9, 2017. Defendants admit that DHSS is responsible for licensing ambulatory surgical centers, including abortion facility ASCs, and that DHSS has authority to promulgate “reasonable rules, regulations, and standards” as provided in Mo. Rev. Stat. §197.225. The statutes speak for themselves, and Defendants deny all allegations of Paragraph 11 not in conformance with the statutes. The

second sentence of Paragraph 11 is an assertion of law that Defendants are not required to admit or deny.

12. Defendants deny that Chris Koster is the Attorney General of the State of Missouri in that Joshua D. Hawley is the Attorney General for the State of Missouri. Section 197.235 RSMo speaks for itself, and Defendants deny all allegations of Paragraph 12 not in conformance with the statute. Paragraph 12 of Plaintiffs' Complaint contains legal conclusions that Defendants are not required to admit or deny. The third sentence of Paragraph 12 is an assertion of law that Defendants are not required to admit or deny. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 12 of Plaintiffs' Complaint.

13. Defendants admit that Defendant Daniel Knight is the Prosecuting Attorney for Boone County, Missouri, in which the Columbia Center is located. Paragraph 13 of Plaintiffs' Complaint contains legal conclusions that Defendants are not required to admit or deny. The third sentence of Paragraph 13 is an assertion of law that Defendants are not required to admit or deny. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 13 of Plaintiffs' Complaint.

14. Defendants admit that Defendant Jean Peters Baker is the

Prosecuting Attorney for Jackson County, Missouri, where the Broussard Center/Comprehensive Health's Kansas City facility is located. Paragraph 14 of Plaintiffs' Complaint contains legal conclusions that Defendants are not required to admit or deny. The third sentence of Paragraph 14 is an assertion of law that Defendants are not required to admit or deny. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 14 of Plaintiffs' Complaint.

15. Defendants deny that Dean Dankelson is the Prosecuting Attorney for Jasper County, in that Theresa Kenney is the Prosecuting Attorney for Jasper County. Defendants admit, on information and belief, that Plaintiff RHS has a health center in Joplin, Jasper County, Missouri. Paragraph 15 of Plaintiffs' Complaint contains legal conclusions that Defendants are not required to admit or deny. The third sentence of Paragraph 15 is an assertion of law that Defendants are not required to admit or deny. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 15 of Plaintiffs' Complaint.

16. Defendants admit that Defendant Dan Patterson is the Prosecuting Attorney for Greene County, Missouri, and admit, on information and belief, that Plaintiff RHS has a health center in Springfield, Greene County, Missouri. Paragraph 16 of Plaintiffs' Complaint contains legal

conclusions that Defendants are not required to admit or deny. The third sentence of Paragraph 16 is an assertion of law that Defendants are not required to admit or deny. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 16 of Plaintiffs' Complaint.

“IV. FACTUAL ALLEGATIONS”

“A. Abortion Background”

17. Defendants deny the allegations contained in Paragraph 17 of Plaintiffs' Complaint.

18. Defendants admit that abortion can be performed surgically, or may be induced by administering medication. Defendants admit that medical instruments can be used during an abortion. Defendants admit that Plaintiff RHS currently offers both surgical and medication abortion services at its Forest Park abortion facility in St. Louis. Defendants deny the remaining allegations contained in Paragraph 18 of Plaintiffs' Complaint.

19. Defendants are without sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 19 of Plaintiffs' Complaint and therefore deny the same.

“B. ASC Restriction”

20. The statutes and regulations speak for themselves, and

Defendants deny all allegations of Paragraph 20 not in conformance with the statutes and/or regulations. Paragraph 20 of Plaintiffs' Complaint contains legal conclusions that Defendants are not required to admit or deny. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 20 of Plaintiffs' Complaint.

21. Section 197.235 RSMo speaks for itself, and Defendants deny all allegations of Paragraph 21 not in conformance with the statute.

22. Mo. Code Regs. tit. 19, §30-30.070 speaks for itself, and Defendants deny all allegations of Paragraph 22 not in conformance with the regulation. Defendants admit that, during the preliminary injunction hearing in the 2007 federal case, *Planned Parenthood v. Drummond*, W.D. Mo. Case No. 07-4164, DHSS took the position that facilities not licensed before 2007 HB 1055 took effect would be required to comply with Mo. Code Regs. tit. 19, §30-30.070(2) if such facilities were providing abortions and were ambulatory surgical centers as defined in Mo. Rev. Stat. §197.200. Defendants deny the remaining allegations contained in Paragraph 22 of Plaintiffs' Complaint.

23. Defendants admit that Plaintiff Comprehensive Health's Columbia Center and Brous Center locations do not comply with all requirements of Mo. Code Regs. tit. 19, §30-30.070(2), however, the 2010

Settlement Agreement granted waivers and deviations from various requirements in §30-30.070(2). Further answering, Defendants affirmatively state that in 2015, DHSS granted a variance request for a requirement in §30-30.070(2) at the Columbia Center. Defendants are without sufficient information to form a belief as to the truth of the allegations that RHS' Springfield and Joplin locations do not meet the requirements of §30-30.070(2), and therefore deny the same. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 23 of Plaintiffs' Complaint.

24. *Whole Women's Health v. Hellerstedt*, 136 S.Ct. 2292 (2016) speaks for itself. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 24 of Plaintiffs' Complaint.

25. Defendants admit that the vagina has bacterial flora in it. Defendants deny the remaining allegations contained in Paragraph 25 of Plaintiffs' Complaint.

26. Paragraph 26 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. Defendants are without sufficient information to form a belief as to the truth of the allegations contained in the first three sentence of Paragraph 26 of

Plaintiffs' Complaint, and therefore deny the same. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 26 of Plaintiffs' Complaint.

27. Defendants admit that medication abortion can involve taking two different medications at different times. Defendants deny the remaining allegations contained in Paragraph 27 of Plaintiffs' Complaint.

28. Defendants admit that DHSS entered into the settlement agreement that can be found in the record in this case, see Ct. Doc. 28-1 at 17 through 36. The settlement agreement speaks for itself. Defendants admit that it has granted deviations pursuant to Mo. Code Regs. Tit. 19, § 30-30.070 in the past. Further answering, Defendants affirmatively state that DHSS has a process that allows it to grant waivers or deviations from requirements of Mo. Code Regs. tit. 19, §30-30.070(2), *see* Mo. Code Regs. tit. 19, §30-30.070(1). To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 28 of Plaintiffs' Complaint.

29. Defendants deny the allegations contained in Paragraph 29 of Plaintiffs' Complaint.

30. Defendants admit that RHS was not a party to the 2010 settlement agreement or the 2007 federal case, *Planned Parenthood v. Drummond*, W.D. Mo. Case No. 07-4164. Defendants admit that the Joplin

and Springfield health centers have not applied for abortion facility licenses, and have not requested waivers or deviations, and that the regulations applicable to abortion facility ASCs apply to them. Defendants are without sufficient information to form a belief as to the truth of the remaining allegations contained in Paragraph 30 of Plaintiffs' Complaint, and therefore deny the same.

“C. Hospital Relationship Restriction”

31. Paragraph 31 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. The statute and regulation speak for themselves, and Defendants deny all allegations of Paragraph 31 not in conformance with the statute and/or regulation.

32. Missouri's statutes speak for themselves, and Defendants deny all allegations of Paragraph 32 not in conformance with the statutes. Paragraph 32 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 32 of Plaintiffs' Complaint.

33. Paragraph 33 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny.

Defendants deny the remaining allegations contained in Paragraph 33 of Plaintiffs' Complaint.

34. Paragraph 34 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. Defendants are without sufficient information to form a belief as to the truth of the allegations contained in the first three sentences of Paragraph 34 of Plaintiffs' Complaint and therefore deny the same. Defendants admit that effective December 1, 2015, the category of hospital privileges held by the physician who had been providing abortion services at the Columbia Center were eliminated by MU Health Care. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 34 of Plaintiffs' Complaint.

35. Defendants deny the factual allegations contained in the second sentence of Paragraph 35 of Plaintiffs' Complaint. Defendants are without sufficient information to form a belief as to the truth of the remaining allegations contained in Paragraph 35 of Plaintiffs' Complaint, and therefore deny the same.

36. Defendants are without sufficient information to form a belief as to the truth of the allegations contained in Paragraph 36 of Plaintiffs' Complaint, and therefore deny the same.

37. Paragraph 37 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. *Whole Women's Health v. Hellerstedt*, 136 S.Ct. 2292 (2016) speaks for itself. To the extent a further response is required, Defendants deny the remaining allegations contained in Paragraph 37 of Plaintiffs' Complaint.

38. Defendants deny that abortion is "extremely safe." Defendants are without sufficient information to form a belief as to the truth of the remaining allegations contained in Paragraph 38 of Plaintiffs' Complaint, and therefore deny the same.

39. Defendants deny that abortion complications are rare. Defendants admit that patients may not experience symptoms related to some abortion complications until after having left the location where the abortion was provided. Defendants are without sufficient information to form a belief as to the truth of the remaining allegations contained in Paragraph 39 of Plaintiffs' Complaint, and therefore deny the same.

40. Defendants are without sufficient information to form a belief as to the truth of the allegations contained in Paragraph 40 of Plaintiffs' Complaint, and therefore deny the same.

41. 42 U.S.C. §1395dd(b) ("EMTALA") speaks for itself, and Defendants deny all allegations not in conformance with the statute.

Defendants are without sufficient information to form a belief as to the truth of the remaining allegations contained in Paragraph 41 of Plaintiffs' Complaint, and therefore deny the same.

42. Defendants are without sufficient information to form a belief as to the truth of the allegations contained in Paragraph 42 of Plaintiffs' Complaint, and therefore deny the same.

43. Defendants deny the allegations contained in Paragraph 43 of Plaintiffs' Complaint.

“D. The Impact of the Restrictions”

44. Paragraph 44 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the remaining allegations contained in Paragraph 44 of Plaintiffs' Complaint.

45. Defendants deny the allegations contained in Paragraph 45 of Plaintiffs' Complaint.

46. Defendants deny that “abortion is one of the safest procedures in contemporary medicine.” Defendants are without sufficient information to form a belief as to the truth of the remaining allegations contained in Paragraph 46 of Plaintiffs' Complaint, and therefore deny the same.

47. Paragraph 47 of Plaintiffs' Complaint contains legal conclusions

and arguments that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the remaining allegations contained in Paragraph 47 of Plaintiffs' Complaint.

48. Paragraph 48 of Plaintiffs' Complaint contains legal conclusions and arguments that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the remaining allegations contained in Paragraph 48 of Plaintiffs' Complaint.

49. Paragraph 49 of Plaintiffs' Complaint contains a legal conclusion or argument that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the remaining allegations contained in Paragraph 49 of Plaintiffs' Complaint.

“CLAIMS FOR RELIEF”

“COUNT I (Substantive Due Process—Right to Privacy—ASC Restriction)”

50. As to Paragraph 50 of Plaintiffs' Complaint, Defendants admit and deny Paragraphs 1 through 49 of Plaintiffs' Complaint in accordance with Defendants' answers as if set forth herein.

51. Paragraph 51 of Plaintiffs' Complaint contains a legal conclusion or argument that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the allegations contained in

Paragraph 51 of Plaintiffs' Complaint.

“COUNT II (Substantive Due Process—Right to Privacy—Hospital Relationship Restriction)”

52. As to Paragraph 52 of Plaintiffs' Complaint, Defendants admit and deny Paragraphs 1 through 51 of Plaintiffs' Complaint in accordance with Defendants' answers as if set forth herein.

53. Paragraph 53 of Plaintiffs' Complaint contains a legal conclusion or argument that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the allegations contained in Paragraph 53 of Plaintiffs' Complaint.

“COUNT III (Equal Protection—ASC Restriction)”

54. As to Paragraph 54 of Plaintiffs' Complaint, Defendants admit and deny Paragraphs 1 through 53 of Plaintiffs' Complaint in accordance with Defendants' answers as if set forth herein.

55. Paragraph 55 of Plaintiffs' Complaint contains a legal conclusion or argument that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the allegations contained in Paragraph 55 of Plaintiffs' Complaint.

“COUNT IV (Equal Protection—Hospital Relationship Restriction)”

56. As to Paragraph 56 of Plaintiffs' Complaint, Defendants admit

and deny Paragraphs 1 through 55 of Plaintiffs' Complaint in accordance with Defendants' answers as if set forth herein.

57. Paragraph 57 of Plaintiffs' Complaint contains a legal conclusion or argument that Defendants are not required to admit or deny. To the extent a response is required, Defendants deny the allegations contained in Paragraph 57 of Plaintiffs' Complaint.

“REQUEST FOR RELIEF”

58. Paragraph 58 consists of a prayer for relief to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the requested relief.

59. Paragraph 59 consists of a prayer for relief to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the requested relief.

60. Paragraph 60 consists of a prayer for relief to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the requested relief.

61. Paragraph 61 consists of a prayer for relief to which no response is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the requested relief.

62. Paragraph 62 consists of a prayer for relief to which no response

is required. To the extent a response is required, Defendants deny that Plaintiffs are entitled to the requested relief.

63. Defendants deny each and every allegation of Plaintiffs' Complaint not herein admitted.

64. Defendants deny that Plaintiffs are entitled to any of the relief requested.

Affirmative and Other Defenses

65. Plaintiffs have failed to state a claim upon which relief can be granted. Therefore this case should be dismissed under Rule 12(b)(6).

66. Plaintiffs have not established the existence of irreparable harm in the absence of injunctive relief.

67. Plaintiffs' own actions or inaction caused or contributed to cause any deprivation they claim to have sustained.

68. Plaintiffs do not have standing to bring claims on behalf of individuals who presently seek, or in the future may seek, abortions.

69. The challenges to the ASC requirements brought by Plaintiffs are not ripe because, among other reasons, no Plaintiff has applied for a variance or deviation from those requirements, and Plaintiff RHS has not applied for an abortion license.

70. Plaintiffs' challenges to the hospital privileges requirements are

not ripe as to all facilities but the Kansas City facility, because Plaintiffs and affiliated medical personnel have not applied for appropriate hospital privileges and/or transfer agreements at appropriate hospitals.

71. The Plaintiffs Comprehensive Health and Dr. Yeomans' challenges to the hospital privileges requirements are not ripe because Comprehensive Health is bound by the 2010 settlement agreement. *See* Ct. Doc. 28-1 at 17 through 36.

72. Plaintiffs Comprehensive Health and Dr. Yeomans' challenges are not redressable because the Columbia and Kansas City facilities suffer from uncorrected deficiencies that would prevent their use for abortions even if the challenged requirements were enjoined.

73. Plaintiffs' challenges to the hospital privilege requirements are not redressable because they have asserted no ripe challenge to the ASC requirements.

74. The claims asserted by Plaintiffs Comprehensive Health and Dr. Yeomans are barred by the 2010 settlement agreement. *See* Ct. Doc. 28-1 at 17 through 36.

75. Plaintiffs' challenges to the ASC requirements should be denied because the ASC requirements protect women's health and safety and do not impose an undue burden on access to abortion.

76. Plaintiffs' challenges to the hospital-privileges requirements should be denied because the hospital-privileges requirements protect women's health and safety and do not impose an undue burden on access to abortion.

77. Plaintiffs' prayer for relief is overbroad in that it seeks to enjoin all regulations of abortion facilities, in direct contravention of *Roe v. Wade*, 410 U.S. 113, 93 S.Ct. 705 (1973), *Planned Parenthood of Southeastern Pennsylvania v. Casey*, 505 U.S. 833, 112 S.Ct. 2791 (1992), *Whole Women's Health v. Hellerstedt*, 136 S.Ct. 2292 (2016), and other law.

78. Plaintiffs' prayer for relief is overbroad in that it seeks a state-wide injunction.

79. Plaintiffs' prayer for relief is overbroad in that it seeks an injunction against the enforcement of statutes and regulations that impose no undue burden on access to abortion.

80. Plaintiffs' prayer for relief is overbroad in that it seeks relief for women as to whom the restrictions unquestionably pose no undue burden on abortion access.

81. Defendants incorporate by reference any additional defenses that may be uncovered or made known during the investigation and discovery in this case. Defendants specifically reserve the right to amend this

answer to include any such defenses, including any affirmative defenses.

Jury Demand

82. Defendants demand a trial by jury on all issues triable by a jury.

Prayer for Relief

83. For the reasons stated hereinabove, Defendants request that the Court order judgment in their favor, award them their costs and expenses, and for such other and further relief as the Court deems just and proper in the premises.

Respectfully submitted,

JOSHUA D. HAWLEY
Attorney General

D. John Sauer
State Solicitor

/s/ Emily A. Dodge
Emily A. Dodge
Assistant Attorney General
Mo. Bar No. 53914
P.O. Box 899
Jefferson City, MO 65102
Phone No. (573) 751-4692
Fax No. (573) 751-9456

ATTORNEYS FOR DEFENDANTS
HAWLEY AND WILLIAMS

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification to the following:

Arthur A. Benson
Jamie K. Lansford
Arthur Benson & Associates
4006 Central Ave.
Kansas City, MO 64111

Melissa A. Cohen
Jennifer Sandman
Planned Parenthood Federation of American Inc
123 William Street
New York, New York 10038

Ronald N. Sweet
Boone County Assistant Attorney
801 E. Walnut, Suite 211
Columbia, MO 65201

Robert Travis Willingham
Jackson County Counselor's Office
415 E. 12th Street, Suite 200
Kansas City, MO 64106

Norman Earl Rouse
5759 E. 20th Street
Joplin, MO 64801

Timothy Myers
Greene County Prosecutor's Office
1010 N. Boonville

Springfield, MO 65802

/s/ *Emily A. Dodge*
Assistant Attorney General