

IN THE CIRCUIT COURT OF CLAY COUNTY, MISSOURI, AT LIBERTY  
SEVENTH JUDICIAL CIRCUIT

IN THE MATTER OF THE SEARCH )  
WARRANT EXECUTED AT )  
3620 N. LISTER, KANSAS CITY, MO )  
ON OCTOBER 19, 2011 )  
)  
)  
)  
)  
)  
)

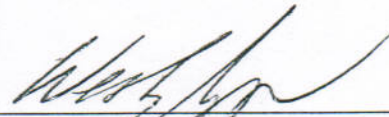
Warrant No. 10 18 11 7B  
Division Seven

STATE'S MOTION TO SEAL COURT RECORDS

Comes now the State of Missouri, by and through Assistant Prosecuting Attorney Wesley M. Rogers, and pursuant to Supreme Court Operating Rule 4.24(1)(r), Section 610.100(2), RSMo., and Section 610.100(3), RSMo. asks this court to seal records relating to search warrant no. 10 18 11 7B. In support of its motion, the State states as follows:

1. The search warrant was executed at 3620 N. Lister, Kansas City, MO on October 19, 2011.
2. The search warrant was sought to assist in the pending investigation of missing child, L.I. who was last seen on October 3, 2011.
3. There is information contained in the affidavit and application for the search warrant that was necessary to secure the search warrant that is currently not public knowledge.
4. If the information contained in the affidavit and application for search warrant is released to the public, it would likely interfere in the ongoing investigation of the missing child.


Respectfully submitted,



Wesley M. Rogers #60270  
Assistant Prosecuting Attorney  
Clay County Courthouse  
11 South Water Street  
Liberty, MO 64068  
Ph: (816) 736-8300  
Fax: (816) 736-8301

**FILED**

TIME: OCT 21 2011 11:13  
Clay County Circuit Court

10/21/11  
Denied  


**Officer's Return**

I certify that I am a peace officer within the State of Missouri and executed the above search warrant as follows:

Date and manner of execution: 10-19-11 KNOCK

Name of possessor (and owner if known and if not the same) of property: \_\_\_\_\_

A property receipt and a warrant copy were left  with possessor  in the premises.

The inventory receipt is attached to this return  Yes  No

Property seized (general description): \_\_\_\_\_

Attached to this return are:  Photograph(s)  Copy/copies of items seized  Inventory.

10-19-11  
Date

DET. [Signature] 4542  
Signature of Officer Making Return

**FILED**

TIME: OCT 21 2011 11:37

Clay County Circuit Court

RETURN / RECEIPT FOR SEARCH WARRANT

SUPP CRN 11-071958

I, Det. David Albers, #4542, being a peace officer in and for the county of Clay, State of Missouri, do hereby make Return / Receipt of the attached Warrant as follows:

That on the 19th day of October, 2011, and within 10 days after filing of the Application for Issuance of Search Warrant, I went to the person, place or thing described in said Warrant and searched the same for the property described, and that upon said person, place or thing I discovered the following property described in said Warrant which I then and there took into my possession: (list property taken)

- Multi-color comforter
- Purple shorts
- Multi-color Disney character shirt
- Glow worm toy
- "Cars" themed blanket
- Rolls of tape
- Tape dispenser

that I made this inventory in the presence of (possessor) the person from whose possession I took said property; that the owner of said property is Jeremy Irwin (that there was no person present from whose possession said property was taken;) that I delivered to said possessor and/or owner a Receipt for the property taken, together with a copy of this warrant (that, there being no person in possession of said property present on said premises, I left a copy of this Warrant with a Receipt for the property taken, in a conspicuous place on said premises); that I have now placed said property so taken in the possession of the Court that issued said Search Warrant.

  
PEACE OFFICER

Subscribed and Sworn before me this            day of            ,            .

\_\_\_\_\_  
CLERK OF THE CIRCUIT COURT



IN THE CIRCUIT COURT OF CLAY COUNTY, MISSOURI

Judge or Division: 7	Case Number: 10 18 11 76	<b>FILED</b> TIME: OCT 18 2011 3:00pm
Clay County Circuit Court (Date File Stamp)		

Application for Search Warrant

I am a  peace officer  prosecuting attorney,  
 I am submitting this application by  hard-copy  facsimile  other electronic means: \_\_\_\_\_

Being duly sworn and pursuant to Section 542.276 RSMo, I state upon information and belief the following:

Describe facts and/or attach affidavit showing probable cause.  
 Affidavit(s) attached  Yes  No

Describe in detail the person, place, or thing to be searched.  
 3620 N. Lister Drive, Kansas City, Clay County, Missouri. The house is a one story single family residence; the house is light green with white brick front. The house is the third structure south of 37th on the West side of N. Lister. The numbers 3620 are clearly displayed on the house to right of the front door.

The actual land of 3620 N. Lister.

Any and all vehicles (operable or non-operable) and trailers located on the property of 3620 N. Lister.

The detached building located to the rear of the 3620 N. Lister residence.

Property to be seized. [Describe in detail the property, article, material, substance, or person to be searched for and seized.]  
 Any evidence deemed to have evidentiary value to the relevant case of a missing child, to include, but not limited to DNA, fingerprints, cell phones and evidence of human decomposition.

Based on this information, I request that the court issue a Search Warrant as provided by law.

Kenneth W. Dwyer 45  
Applicant

10/18/11  
Date

[Signature]  
Person Authorized to Administer Oaths

[Signature]  
Prosecuting Attorney

Subscribed and sworn to before me on this

10-18-11 (Seal)  
 3:00  AM  PM  
 Date and Time of Application

Clay County, MO

AFFIDAVIT FOR SEARCH WARRANT

10 18 11 7R

STATE OF MISSOURI

ss.

COUNTY OF CLAY

I, Kimberly Shirley-Williams, Detective with the Kansas City, Missouri Police Department, FIRST BEING SWORN UPON MY OATH STATE AS FOLLOWS, BEFORE THE UNDERSIGNED JUDGE AUTHORIZED TO ISSUE WARRANTS IN CRIMINAL CASES:

My name is Kimberly Shirley-Williams. I have been employed at the Kansas City, Missouri Police Department for over thirteen years. I am currently assigned as a detective with the Kansas City Missouri Police Department Crimes Against Children Unit.

I am requesting a Search Warrant for the residence at 3620 N. Lister Drive, Kansas City, Clay County, Missouri, the actual land, any and all vehicles (operable or non-operable) and trailers located on the property, and the detached building located to the rear of the residence.

The property to be searched for and seized is described as follows: Any evidence deemed to have evidentiary value to the relevant case of a missing child, to include, but not limited to DNA, fingerprints, cell phones and evidence of human decomposition.

On October 4, 2011 patrol officers with the Kansas City Missouri Police department were dispatched to 3620 N. Lister on a reported missing child.

Upon arrival, contact was made with Jeremy Irwin who stated his ten-month-old daughter (LI) was missing from their house. Officers entered the residence to search for the baby. All rooms in the house and the basement were checked for the baby. An area canvass was also conducted in the back yard, both yielding negative results.

Detectives obtained consent to search for the house beginning on October 4, 2011. Detectives and crime scene personnel searched the home for any evidence of a child or evidence to support an abduction of a child. Crime scene personnel recovered items from the home, but due to the initial information provided by the family, the only areas extensively processed for DNA and fingerprints during the consent were the baby's bedroom and possible points of entry.

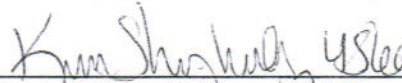
Interviews with Jeremy Irwin and Deborah Bradley, the baby's mother and father, revealed the baby was missing along with three cell phones. Law enforcement personnel searched the home and located a cell phone in the bottom desk drawer of the computer desk. It was later determined that the cell phone located in the drawer was not one of the missing cell phones in question. The three reported missing cell phones have not been located and would include additional evidence. A search of the surrounding area for evidence of the baby and/or cell phones has been met with negative results.

Investigative interviews with the people involved revealed conflicting information for clear direction in the investigation. Bradley made the statement she did not initially look for her baby behind the house because she "was afraid of what she might find." The extent of the search had been limited in nature with consent although each search has recovered evidence helpful to further progress the investigation. However, the type of search needed at this time would not be conducive to being revoked at any time by the owners and/or their attorney. A more extensive intrusive search needs to be completed at the property where the baby was last accounted. There have been 585 tips/leads investigated as of this date and none have revealed the whereabouts or deposition of the baby. The items and evidence recovered as of this date supports the need for a

thorough, time consuming, and systematic search using additional techniques. The search needed on the property may include handheld tool excavation of the physical land. The land includes a garden area with portions of dirt having an appearance of being recently disturbed or overturned.


On October 17, 2011 an FBI cadaver dog was brought into the residence upon consent of Irwin and Bradley. The cadaver dog indicated a positive "hit" for the scent of a deceased human in an area of the floor of Bradley's bedroom near the bed.

The foregoing is true to the best belief and knowledge, further affiant saith not.



Det. Kimberly Shirley-Williams #4566

Subscribed and sworn to before me, an Associate Circuit Judge of Clay County, State of Missouri, this 18<sup>th</sup> day of Oct., 2011 at 3:00 p.m.

  
\_\_\_\_\_  
JUDGE



IN THE CIRCUIT COURT OF CLAY COUNTY, MISSOURI

10 18 11 7B

Judge or Division: <u>7</u>	Case Number: <u>101811-7B</u>	<b>FILED</b> TIME: <u>OCT 18 2011</u> (Date File Stamp) <u>3:00pm</u>
Name and Title of Person Making Application: Det. Kimberly Shirley-Williams, KCPD		

**Search Warrant**

Clay County Circuit Court

**State of Missouri to any Peace Officer in Missouri:**

Based on information provided in a verified application/affidavit, the Court finds probable cause to warrant a search for and/or seizure of the following:

- Property, article, material or substance that constitutes evidence of the commission of a crime;
- Property that has been stolen or acquired in any manner declared an offense;
- Property for which possession is an offense under the laws of this state;
- Any person for whom a valid felony arrest warrant is outstanding;
- Deceased human fetus or corpse, or part thereof;
- Other (Specify - See Missouri Revised Statute Section 542.271)

You are commanded to search, seize, and photograph or copy, as applicable, the person, place, or thing described below. Photographs or copies of the seized property, article, materials, substance, or person shall be filed with the Court within 10 days.

The person, place or thing to be searched is described as follows:

3620 N. Lister Drive, Kansas City, Clay County, Missouri. The house is a one story single family residence; the house is light green with white brick front. The house is the third structure south of 37th on the west side of N. Lister. The numbers 3620 are clearly displayed on the house right of the front door.

The actual land of 3620 N. Lister.

Any and all vehicles (operable or non-operable) and trailers located on the property of 3620 N. Lister.

The detached building located to the rear of the 3620 N. Lister residence.

The property, article, material, substance or person to be searched for and seized is described as follows:

Any evidence deemed to have evidentiary value to the relevant case of a missing child, to include, but not limited to DNA, fingerprints, cell phones and evidence of human decomposition.

10/18/11 @ 3:00pm  
Date and Time

[Signature]  
Judge

This warrant is issued by:  hard-copy     facsimile     other electronic means:

**Directions to Officer:** Make a complete and accurate written inventory of any property seized pursuant to this warrant. When possible, complete the inventory in the presence of the person from whose possession this property is taken, and give a receipt for the property, as well as copy of this warrant to that person. If no person is found in possession of the property, leave the receipt and warrant copy in the premises searched. Immediately deliver photographs or copies of the seized property, article, materials, substance, or person, the written inventory, and the warrant return to this Court.

**Officer's Return**

I certify that I am a peace officer within the State of Missouri and executed the above search warrant as follows:

Date and manner of execution: \_\_\_\_\_

Name of possessor (and owner if known and if not the same) of property: \_\_\_\_\_

A property receipt and a warrant copy were left  with possessor  in the premises.

The inventory receipt is attached to this return  Yes  No

Property seized (general description): \_\_\_\_\_

Attached to this return are:  Photograph(s)  Copy/copies of items seized  Inventory.

\_\_\_\_\_ Date

\_\_\_\_\_ Signature of Officer Making Return