

IN THE CIRCUIT COURT OF CAPE GIRARDEAU COUNTY, MISSOURI

STATE OF MISSOURI)
)
Plaintiff,)
) Case No.
v.)
)
TIMOTHY W. KRAJCIR)
Big Muddy Correctional Center)
Ina, IL 62846)
White/M DOB: 11/28/1944)
SSN:)
SID: IL08941720)
FBI: 00611788E)
OCN:)
)
Defendant.)

COMPLAINT AND REQUEST FOR A WARRANT IN A FELONY CASE

Comes now, the Prosecuting Attorney of the County of Cape Girardeau, State of Missouri, being duly sworn upon oath and upon information and belief, and states that there is probable cause to believe that the accused committed the following crimes:

COUNT: I

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 565.001, RSMo, committed the class A felony of capital murder, punishable upon conviction under Section 565.008.1, RSMo, in that the defendant willfully, knowingly, with premeditation, deliberately and unlawfully killed Mary E. Parsh by shooting her on or about August 12th, 1977 in the County of Cape Girardeau, State of Missouri, thereby causing her to die on or about August 12th, 1977, in the County of Cape Girardeau, State of Missouri.

Charge Code: 1001004.0

COUNT: II

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 565.001, RSMo, committed the class A felony of capital murder, punishable upon conviction under Section 565.008.1, RSMo, in that the defendant willfully, knowingly, with premeditation, deliberately and unlawfully killed Brenda K. Parsh by shooting her on or about August 12th, 1977, in the County of Cape Girardeau, State of Missouri, thereby causing her to die on or about August 12th, 1977, in the County of Cape Girardeau, State of Missouri.

Charge Code: 1001004.0

COUNT: III

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 565.003, RSMo, committed the class A felony of murder in the first degree, punishable upon conviction under Section 565.008.2, RSMo, in that the defendant unlawfully killed Sheila E. Cole, by shooting her on or about November 16th, 1977, in the County of Alexander, State of Illinois, thereby causing her to die on or about November 16, 1977, in the County of Alexander, State of Illinois, and such killing was committed in the perpetration of the felony of kidnapping on or about November 16, 1977, in violation of Section 569.240, RSMo 1969, when the defendant intentionally kidnapped Sheila E. Cole from the parking lot at Walmart at 211 South Kingshighway, in the City of Cape Girardeau, County of Cape Girardeau, State of Missouri, with intent to cause such person to be sent or taken out of this state.

Charge Code: 1002004.0

COUNT: IV

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 566.030, RSMo, committed the class A felony of forcible rape, punishable upon conviction under Section 558.011.1(1), RSMo, in that on or about January 9th, 1982, in the County of Cape Girardeau, State of Missouri, the defendant knowingly had sexual intercourse with A. S., to whom defendant was not married, without the consent of A. S. by the use of forcible compulsion, and in the course of such offense, the defendant displayed a deadly weapon, specifically a handgun, in a threatening manner.

Charge Code: 1101199.0

COUNT: V

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 565.001, RSMo, committed the class A felony of capital murder, punishable upon conviction under Section 565.008.1, RSMo, in that the defendant willfully, knowingly, with premeditation, deliberately and unlawfully killed Margie L. Call by strangling her on or about January 27th, 1982 in the County of Cape Girardeau, State of Missouri, thereby causing her to die on or about January 27th, 1982 in the County of Cape Girardeau, State of Missouri.

Charge Code: 1001099.0

COUNT: VI

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 566.030, RSMo, committed the class A felony of forcible rape, punishable upon conviction under Section 558.011.1.1, RSMo, in that on or about January 27th, 1982, in the County of Cape Girardeau, State of Missouri, the defendant knowingly had sexual intercourse with Margie L. Call, to whom defendant was not married, without the consent of Margie L. Call by the use of forcible compulsion, and in the course of such offense, the defendant inflicted serious physical injury on Margie L. Call.

Charge Code: 1101199.0

COUNT: VII

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 565.001, RSMo, committed the class A felony of capital murder, punishable upon conviction under Section 565.008.1, RSMo, in that the defendant willfully, knowingly, with premeditation, deliberately and unlawfully killed Mildred Wallace by shooting her on or about June 21st, 1982 in the County of Cape Girardeau, State of Missouri, thereby causing her to die on or about June 21st, 1982 in the County of Cape Girardeau, State of Missouri.

Charge Code: 1001099.0

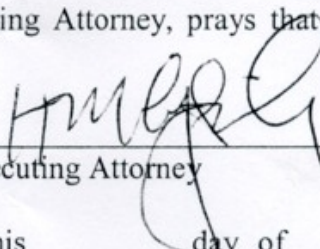
COUNT: VIII

The Prosecuting Attorney of County Cape Girardeau, State of Missouri, charges that the defendant either acting alone or knowingly in concert with another, in violation of Section 566.030, RSMo, committed the class A felony of forcible rape, punishable upon conviction under Section 558.011.1(1), RSMo, in that on or about June 21st, 1982, in the County of Cape Girardeau, State of Missouri, the defendant knowingly had sexual intercourse with Mildred Wallace, to whom defendant was not married, without the consent of Mildred Wallace by the use of forcible compulsion, and in the course of such offense, the defendant inflicted serious physical injury on Mildred Wallace.

Charge Code: 1101199.0

The facts that form the basis for this information and belief are contained in the attached statement of facts 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, H. Morley Swingle, Prosecuting Attorney, prays that an arrest warrant be issued as provided by law.



Prosecuting Attorney

Sworn and subscribed to before me this _____ day of _____.

Susan Wessell
CLERK OF THE COURT

BY: _____