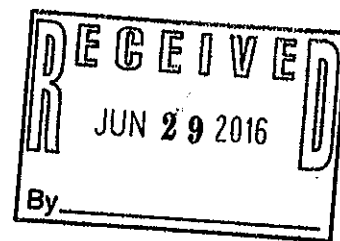




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June 27, 2016

Mr Lucas Zahner
Legal Intern
Midwest Innocence Project
605 W. 47th Street #222
Kansas City MO 64112

RE: Records Request.

Dear Mr. Zahner:

I am the Custodian of Records for the Clay County, Mo., Prosecuting Attorneys' office.

Pursuant to my duties, your letter dated June 23, 2016 was today delivered to me.

I am declining your request.

The Missouri Constitution, Article I, Section 32.1(6) gives victims of crimes "(t)he right to reasonable protection from the defendant or **any person acting on behalf of the defendant,**" (emphasis added) and state law, under RSMo 595.209.1(9) extends this protection to witnesses.

Most respectfully,


James L. Roberts
Custodian of Records

EXHIBIT 2