

IN THE CIRCUIT COURT OF GREENE COUNTY, MISSOURI

Associate Division \_\_\_\_\_

STATE OF MISSOURI,	)	
Plaintiff,	)	
	)	
	)	
vs.	)	Case No. 1831-CR01505
	)	
TOMMY R MORRIS ,	)	OCN#
	)	
Defendant.	)	PA File No. 077397844

**FELONY COMPLAINT**

COUNT I

(Missouri Charge Code: 565.021-001Y19840999.)

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about April 17, 2018, in the County of Greene, State of Missouri, D.S. was killed after a car crash as a result of the immediate flight from the perpetration of the class C felony of attempted delivery of a controlled substance under Section 579.020, RSMo and the class C felony of possession of a controlled substance with intent to deliver under Section 579.020, RSMo, committed by the defendant on or about April 17, 2018, in the County of Greene, State of Missouri.

COUNT II

(Missouri Charge Code: 579.020-004Y201735171.1)

The Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of RSMo 579.020, RSMo, committed the class C felony of attempt to deliver a controlled substance, punishable upon conviction under Sections 58.002 and 558.011, RSMo, in that on or about April 17, 2018, in the County of Greene, State of Missouri, the defendant was in possession of methamphetamine packaged for sale and met with M.D. in a parking lot and such conduct was a substantial step toward the commission of the offense of delivery of methamphetamine, a controlled substance, to M.D., and was done for the purpose of committing the offense of delivery of a controlled substance.

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, specifically that of a class B felony, under Sections 558.016 and 557.036, RSMo, in that he has been found guilty of two or more felonies committed at different times. The felonies are as follows:

1. On or about March 28, 2001, the defendant was found guilty of the felony of receiving stolen property, in the Circuit Court of Greene County, Missouri, in Case No. 31300CF8288.
2. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF4286.

3. On or about November 16, 2007, the defendant was found guilty of the felony of possession with intent to distribute, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF0963.
4. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF5040.
5. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31303CF4405.
6. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF5700.
7. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF5700.
8. On or about September 7, 2012, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1131-CR03922-01.
9. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.
10. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.

The defendant is also a persistent drug offender and is punishable by sentence to the range of punishment for a class A felony under Sections 579.170, RSMo, in that he has been found guilty of two or more felony offenses relating to a controlled substance. The felonies are as follows:

1. On or about November 16, 2007, the defendant was found guilty of the felony of possession with intent to distribute, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF0963.
2. On or about September 7, 2012, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1131-CR03922-01.
3. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.
4. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.

COUNT III

(Missouri Charge Code: 579.020-004Y201735072.0)

In the alternative to Count II, the Prosecuting Attorney of the County of Greene, State of Missouri, charges that the defendant, in violation of Section 579.020, RSMo, committed the class C felony of delivery of a controlled substance, punishable upon conviction under Sections 558.002 and 558.011, RSMo, in that on or about April 17, 2018, in the County of Greene, State of Missouri, the defendant, with the intent to deliver

knowingly possessed methamphetamine, a controlled substance, knowing of its presence and nature.

Defendant is a prior offender under Section 558.016, RSMo. Defendant is also a persistent offender and is punishable by sentence to an extended term of imprisonment, specifically that of a class B felony, under Sections 558.016 and 557.036, RSMo, in that he has been found guilty of two or more felonies committed at different times. The felonies are as follows:

1. On or about March 28, 2001, the defendant was found guilty of the felony of receiving stolen property, in the Circuit Court of Greene County, Missouri, in Case No. 31300CF8288.
2. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF4286.
3. On or about November 16, 2007, the defendant was found guilty of the felony of possession with intent to distribute, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF0963.
4. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF5040.
5. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31303CF4405.
6. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF5700.
7. On or about November 16, 2007, the defendant was found guilty of the felony of forgery, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF5700.
8. On or about September 7, 2012, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1131-CR03922-01.
9. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.
10. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.

The defendant is also a persistent drug offender and is punishable by sentence to the range of punishment for a class A felony under Sections 579.170, RSMo, in that he has been found guilty of two or more felony offenses relating to a controlled substance. The felonies are as follows:

1. On or about November 16, 2007, the defendant was found guilty of the felony of possession with intent to distribute, in the Circuit Court of Greene County, Missouri, in Case No. 31306CF0963.
2. On or about September 7, 2012, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1131-CR03922-01.

3. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.
4. On or about October 7, 2016, the defendant was found guilty of the felony of possession of a controlled substance, in the Circuit Court of Greene County, Missouri, in Case No. 1531-CR06208-01.

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

DAN PATTERSON  
Prosecuting Attorney of the County of  
Greene, State of Missouri, by



*Electronically signed:*  
4/18/2018 2:30 PM

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