

IN THE CIRCUIT COURT OF TANEY COUNTY, MISSOURI
Associate Division _____

STATE OF MISSOURI,)
)
) Plaintiff,)
))
) Case No. _____
) OCN
 vs.) 10053
) 13033
 GERALD L CHAMBERLAIN,)
) 13033
) Defendant.)

State of Missouri)
) ss.
 County of Taney)

FELONY COMPLAINT

COMES NOW the Prosecuting Attorney of the County of Taney, State of Missouri, being duly sworn upon oath 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 the County of Taney, State of Missouri, charges that the defendant, in violation of The Prosecuting Attorney of the County of Taney, State of Missouri, charges that the defendant, in violation of Section 565.024, RSMo, committed the class C felony of involuntary manslaughter, punishable upon conviction under Section 558.011 and 560.011, RSMo, in that on or about the 23rd day of April, 2007, in the County of Taney, State of Missouri, the defendant, GERALD L CHAMBERLAIN, while under the influence of alcohol, caused the death of MARY K. FLANIGAN by striking another vehicle with the victim as an occupant when operating a motor vehicle with criminal negligence in that defendant was driving on the wrong side of the road.

COUNT II

The Prosecuting Attorney of the County of Taney, State of Missouri, charges that the defendant, in violation of Section 565.060, RSMo, committed the class C felony of assault in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in the on or about the 23rd day of April, 2007, in the County of Taney, State of Missouri, the defendant, GERALD L. CHAMBERLAIN, operated a motor vehicle while under the influence of alcohol

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and acted with criminal negligence in that the defendant was driving on the wrong side of the road and caused physical injury to GAIL LANGSTON by colliding with a vehicle in which the victim was an occupant.

COUNT III

The Prosecuting Attorney of the County of Taney, State of Missouri, charges that the defendant, in violation of Section 565.060, RSMo, committed the class C felony of assault in the second degree, punishable upon conviction under Sections 558.011 and 560.011, RSMo, in the on or about the 23rd day of April, 2007, in the County of Taney, State of Missouri, the defendant, GERALD L. CHAMBERLAIN, operated a motor vehicle while under the influence of alcohol and acted with criminal negligence in that the defendant was driving on the wrong side of the road and caused physical injury to OWEN MCMULLEN by colliding with a vehicle in which the victim was an occupant.

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.

JEFFREY M. MERRELL
Prosecuting Attorney of the County of
Taney, State of Missouri, by

JEFFREY MERRELL
Assistant Prosecuting Attorney
County of Taney, State of Missouri
Missouri Bar #46206