

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT KANSAS CITY

JANE DOE I, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 03-CV-219085
)	
THOMAS PHILLIPS, et al.,)	Division No. 4
)	
Defendants.)	

**MOTION FOR ORDER PROHIBITING USE OF PHOTOGRAPHS OF SORA
REGISTRANTS WHOSE CONVICTIONS PREDATED JANUARY 1, 1985**

COME NOW Plaintiffs, by counsel, and move this Court for an order prohibiting the use and internet publication of photographs of Plaintiffs (other than Jane Doe III) and other SORA¹ registrants whose convictions predated January 1, 1985, which photographs were provided by those registrants in compliance with the statute. The Missouri Supreme Court has held that application of SORA's registration requirements to those Plaintiffs and other registrants whose convictions predated January 1, 1985, is unconstitutional under the Missouri Constitution's prohibition against laws with retrospective application. *Doe v. Phillips*, 194 S.W.3d 833, 852 (Mo. banc 2006). Accordingly, those Plaintiffs and other registrants whose convictions predated January 1, 1985, should never have had to register, and should never have had to provide their photographs to law enforcement authorities as a part of that registration process. Continued use and publication on the internet by law

¹MO. REV. STAT. §§ 589.400 to 589.425, "Sexual Offender Registration Act", also referred to as "Megan's Law".

