

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.	)	

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

Plaintiffs have moved for an order prohibiting the use and internet publication of photographs of Plaintiffs (other than Jane Doe III) and photographs of other SORA<sup>1</sup> registrants whose convictions predated January 1, 1985, which law enforcement was provided by virtue of compliance with a statute that has been determined to be unconstitutional as applied to them. These brief suggestions are offered in support of Plaintiffs' motion.

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); MO. CONST. art I, sec. 13 ("no . . . law . . . retrospective in its operation . . . can be enacted").

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

