



birth being January 28, 1994;

- C. On the date of her detention, Alyssa was enrolled in the 10th grade in Jefferson City Public School;
- D. Alyssa was certified to stand trial as an adult on the present charge of murder in the first degree on December 22, 2009;
- E. The Cole County Sheriff took Alyssa into custody on December 22, 2009, immediately following her certification to stand trial as an adult;
- F. Alyssa was expelled from the Jefferson City Public Schools on December 22, 2009 due to being charged with a felony;
- G. Since the date of her certification -- December 22, 2009 -- Alyssa has remained continuously under the custody and control of the Cole County Sheriff, though housed in other county jails;
- H. Since the date of her expulsion from Jefferson City Public Schools -- December 22, 2009 -- Alyssa has not been enrolled in any program of academic instruction;

2. At the April 28 motion hearing, the State did not deny the truthfulness of any of the above factual averions, but contended that the Motion should be denied because Alyssa was expelled from Jefferson City Public School and that she should not be treated differently than any other county jail inmate.

3. Undersigned counsel is obligated to determine whether the Court's ruling should be reviewed on either direct appeal or by seeking an extraordinary writ. If the

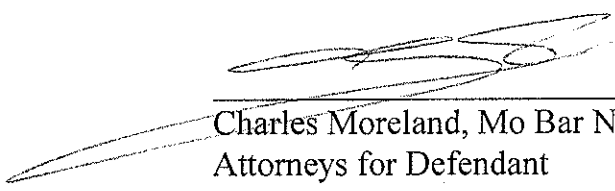
issue is appealed, either by direct appeal or by seeking an extraordinary writ, counsel will be obliged to provide this Court with a complete record on appeal, one that will enable this Court to resolve all of the issues presented. Rule 81.12.

4. The granting of this request will not prejudice the State but rather, will ensure the resolution of all of the issues presented.

WHEREFORE, the Accused requests that this Court grant her leave to supplement the record by (1) the parties stipulating to the above stated facts, (2) submission of affidavits from the attached affidavits from the Cole County Sheriff and a Jefferson City Public School administrator, (3) judicial notice, and/or (4) testimony.

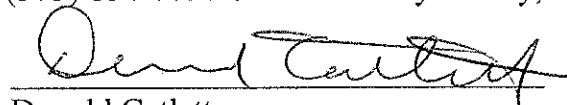
Respectfully submitted,

  
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**Certificate of Service**

I certify that a true copy of the above and foregoing was served to all parties by fax transmission to Mr. Mark Richardson at (573) 634-7797 on this 6th day of July, 2010.

  
Donald Catlett