

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI**  
**AT INDEPENDENCE**

<b>POLICE NO. :</b>	18-045263
<b>PROSECUTOR NO. :</b>	095447001
<b>OCN:</b>	an017942

<b>STATE OF MISSOURI,</b>	)	
	<b>PLAINTIFF,</b>	)
<b>vs.</b>	)	
	)	
<b>ZACHARY R. SPROWLS</b>	)	
<b>5813 S. Appleton</b>	)	<b>CASE NO. 1816-CR</b>
<b>Raytown, MO 64133</b>	)	<b>DIVISION</b>
<b>DOB: 09/19/1990</b>	)	
<b>Race/Sex: W/M</b>	)	
<b>████████████████████</b>	)	
	<b>DEFENDANT.</b>	)

**AMENDED COMPLAINT**

**Count I. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2016 and February 15, 2017, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant had deviate sexual intercourse with █████, who was then less than twelve years old, by touching the defendant's hand to █████'s genitals.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for the unclassified felony of first degree statutory sodomy is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years.

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**Count II. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2016 and February 15, 2017, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with [REDACTED] who was then less than twelve years old, by penetrating [REDACTED] anus with the defendant's finger.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years.

**Count III. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2016 and February 15, 2017, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with [REDACTED] who was then less than twelve years old, by touching the defendant's penis to [REDACTED]'s anus.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years.

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**Count IV. Child Molestation - 2nd Degree -child Less Than 12 Yoa (566.068-001Y20173699.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.068, RSMo, committed the class B felony of child molestation in the second degree, punishable upon conviction under Section 558.011, RSMo, and subject to lifetime supervision under Section 217.735 and Section 559.106, RSMo, in that on or between February 16, 2018 and July 9, 2018, in the County of Jackson, State of Missouri, the defendant, for the purpose of arousing or gratifying the sexual desire of the defendant, subjected [REDACTED] who was then less than twelve years of age, to sexual contact by touching the defendant's hand to [REDACTED] genitals through the clothing.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class B felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than five (5) years and not to exceed fifteen (15) years.

**Count V. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 12 Yoa (566.062-003Y20171199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2018 and July 9, 2018, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant knowingly had deviate sexual intercourse with [REDACTED], who was then a child less than twelve years old, by touching the defendant's penis to [REDACTED]'s genitals.

An individual convicted and sentenced for this offense when the victim is a child less than twelve years of age shall not be eligible for parole until eighty-five percent of the sentence is served.

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**Count VI. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2016 and July 9, 2018, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant had deviate sexual intercourse with ■■■■■, who was then less than twelve years old, by touching the defendant's hand to ■■■■■s vagina.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years.

**Count VII. Statutory Rape 1st Degree - Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Sexual Intercourse With More Than One Person/victim Is Less Than 12 Years Of Age (566.032-002Y19951116.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.032, RSMo, committed the felony of statutory rape in the first degree, punishable upon conviction under Section 566.032, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2016 and July 9, 2018, in the County of Jackson, State of Missouri, the defendant knowingly had sexual intercourse with ■■■■■, a child less than twelve years old.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for the unclassified felony of first degree statutory rape is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years.

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**Count VIII. Statutory Sodomy Or Attempted Statutory Sodomy - Deviate Sexual Intercourse - Person Less Than 12 Yoa (566.062-003Y20171199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2017 and February 15, 2018, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with [REDACTED], who was then less than twelve years old, by touching the defendant's mouth to [REDACTED] genitals.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years.

**Count IX. Statutory Sodomy 1st Degree - Deviate Sexual Intercourse With Person Less Than 14 Years Old - Serious Physical Injury/displays Deadly Weapon Or Dangerous Instrument/subjects Victim To Intercourse With More Than One Person/victim Is Less Than 12 Years Of A (566.062-001Y19951199.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 566.062, RSMo, committed the felony of statutory sodomy in the first degree, punishable upon conviction under Section 566.062, RSMo, and subject to lifetime supervision under Sections 217.735 and 559.106, RSMo, in that on or between February 16, 2016 and July 9, 2018, in the County of Jackson, State of Missouri, the defendant for the purpose of arousing or gratifying the sexual desire of the defendant, had deviate sexual intercourse with [REDACTED] who was then less than twelve years old, by penetrating [REDACTED] anus with the defendant's tongue.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment is imprisonment in the custody of the Missouri Department of Corrections for life or for a term of years not less than ten years.

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**State vs. Zachary R. Sprowls**

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

/s/ Kelly Collins  
Kelly Collins (#68006)  
Assistant Prosecuting Attorney  
321 W. Lexington  
Independence, MO 64050  
(816) 881-3288  
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**WITNESSES:**

1. PO Desiree Abraham, 223 N. Memorial Drive, Independence, MO 64050
2. DET Jaime Harraman, 223 N. Memorial Drive, Independence, MO 64050
3. [REDACTED]
4. Rita M. Owsley, 209 E. Short Ave., Independence, MO 64050

## PROBABLE CAUSE STATEMENT

Date: 7/30/2018

Report #: 2018-45263

I, Jaime L. Harraman, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe between 2016 and 2018, on approximately fifty (50) occasions, Zachary R. Sprowls, (Race- White, Sex- Male, DOB- 09/19/1990, Address-5813 S. Appleton, Raytown, Missouri, 64133, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 06/28/2018 [REDACTED] (mother of the victim) responded to police headquarters to make a report regarding ongoing sexual abuse occurring in her home located at [REDACTED] E. Short Ave, City of Independence, County of Jackson, and State of Missouri. She alleged [REDACTED] was scratching her vaginal area and when asked about it [REDACTED] disclosed Sprowls had touched her private parts and showed his private parts to [REDACTED]. Additionally [REDACTED] disclosed Sprowls had shown her pornographic material and touched [REDACTED] with his private part. He allegedly forced her to wash her hands and change her clothing when he was done. [REDACTED] disclosed this type of activity had been occurring frequently.

On 07/09/2018 the victim ([REDACTED], nine year old female) was forensically interviewed (F.I.) at the Child Protection Center. She was asked why she thought she was there and she stated "because someone hurt me in a bad way". She identified "Zachary Sprowls" as the person that hurt her. She described being hurt in a bad way as "sexually abused me", "it means that he touched me in places I don't want to be touched". She said that he did it more than once and described some of the incidents, most of which occurred at [REDACTED] E. Short Ave., City Of Independence, County of Jackson, State of Missouri. One described incident took place in Kansas City Missouri.

- [REDACTED] was in her room preparing to change into her pajamas. Sprowls followed her and opened the door while she was fully naked. Sprowls placed her on the bed by lifting her forcefully. Sprowls then touched her on her "Privates Front" which she later identified as her way of saying vaginal area by circling the area of the vagina on the F.I. drawing. She also later identified the male "Privates Front" as the penis and the "Back Privates" as the anal area. She described the finger Sprowls would use to touch her as the "pointer" finger. The index finger was circled on the F.I. drawing. When [REDACTED] told Sprowls to stop touching her Sprowls told her to "shut up". She said that it hurt her and it felt bad when Sprowls was touching her. Sprowls told her to "shut up" and told her that he was going to "get mad" and "do it more" if she told on him. She noticed that Sprowls closed the door behind him after he entered the room so nobody would see what he was doing in her room. Sprowls rolled her over and touched her anal area with his finger. Sprowls touched her inside and outside of both the vagina and anus which caused her pain.
- [REDACTED] went to her and she was followed by Sprowls who came into her room and told her to take her clothing off. She told Sprowls "no" but he took her pants and shirt off against her will. Sprowls took his penis out and tried to put it inside of her. She started to cry because Sprowls was holding her down by her feet and it hurt when Sprowls was rubbing his penis into/on her anus. She demonstrated being a position of all fours when Sprowls was trying to put his penis into her anus. [REDACTED] did not disclose her exact age at the time.
- When [REDACTED] was nine (9), "a few weeks ago" there was another incident that she spoke about. She was in a car with Sprowls and his brother [REDACTED] they had to go downtown to pick up a work truck. She later described the area as Downtown Kansas City Missouri; she knew the difference between downtown Kansas City Missouri and Downtown Independence Missouri. It was a business called "Top Master".

After [REDACTED] got out of the car, Sprowls told her to sit up front with him. She told Sprowls that she was not allowed to sit up front with him but Sprowls told her she needed to get up front with him. Sprowls had her manipulate the seatbelt and her shirt so that he could put his hand down her pants. She stated that he was rubbing his finger over her underwear but inside her pants. She said that it was hurting her because Sprowls was sticking his finger into her vagina through her underwear, meaning pushing the fabric into her vagina with his finger. She told him to stop and tried to hit him. Sprowls told her that if she tried to hit him again he was going to put his penis in her anus. When they got to a red light she jumped into the backseat and sat behind him so that he could not touch her again. Sprowls told her to get in the front seat but she refused.

- The same day as the incident in the vehicle [REDACTED] was carried up to her room "like a baby" by Sprowls when they arrived at 209 E. Short. She tried to runaway but Sprowls grabbed her and then sat down in the room. Sprowls had her face him and sit on his lap with her legs wrapped around him and her arms around his neck. [REDACTED] had her pants removed by this time. Sprowls took his penis out of his pants and was lifting her up and down on his penis trying to rub her vagina. She started smacking him trying to make him stop but Sprowls would not stop. She told Sprowls that it hurt her and Sprowls told her "well it feels good to me". She said his penis did not go inside of her; it just rubbed against her vagina. [REDACTED] did not disclose her exact age at the time.
- [REDACTED] said Sprowls put his penis in her "a lot" in the past. She described a time when Sprowls lifted her onto a counter in the kitchen and started to put his fingers inside her vagina. Sprowls exposed his penis and tried to put it inside of her vagina. They heard a door open and he stopped quickly. Her mother came into the kitchen and Sprowls told her mother that he was trying to help her get a cup of water. After her mother left the kitchen Sprowls took her pants down again and exposed his penis. [REDACTED] said Sprowls tried to put his penis inside of her again. She said that it hurt really, really bad. She hit Sprowls and scratched him until he stopped. She got away from Sprowls and ran outside. Sprowls followed her and told her "You're not going anywhere" but she ran to her mother and said that she was going to a friend's house which she did to get away from Sprowls. [REDACTED] stated she was scared to tell her mother [REDACTED]. did not disclose her exact age at the time.
- [REDACTED] was asked if Sprowls ever used anything else in her vagina or anus and [REDACTED] said "no", but he used something that would not leave any "marks" or "fingerprints" something plastic "that is for guys". Sprowls asked [REDACTED] questions "like, do I want to have a baby?" When asked what the thing [REDACTED] described it as being for guys, [REDACTED] said "I think it's a condom" [REDACTED] said Sprowls puts it on his penis. Sprowls had told [REDACTED] about buying the condoms. [REDACTED] knows Sprowls keeps the box of condoms in his car. [REDACTED] only remembers Sprowls using a condom twice.
- [REDACTED] knows Sprowls has taken pictures of her when she gets undressed. The door to her room is missing a door knob so she puts clothing in the hole for privacy. Sprowls is able to open the door easily and comes into her room to take photos of her while she is naked. Sprowls has also taken photos of his penis and holds it in front of her face and forces her to look at it by holding her face in front of his phone. Sprowls takes pictures of her front and back while she is naked. She said she was posed in some of the pictures because Sprowls tells her how to sit and tells her to stand still. She also knows that Sprowls has taken pictures of her when she was not looking. Most of the pictures were taken in her bedroom. Sprowls takes some of them through the hole where the doorknob should be. [REDACTED] has seen the photos of herself on his phone which she described as a grey Samsung. [REDACTED] stated Sprowls had been taking pictures of her for approximately two (2) years (which would have been between the ages of seven (7) and eight (8)).



- █████ stated Sprowls tried to lick her vagina on several occasions and her anus once. She remembers that she was eight (8) years old at the time for the vaginal licking. She said that Sprowls licked the outside and the inside and it did not feel good to her. Sprowls would pull her pants and underwear down in order to lick her. She disclosed the anal licking occurred in her residence in her aunt's bedroom when she was nine (9).

After every sexual encounter Sprowls would threaten her in some way to make sure that she was not going to tell on him. She said Sprowls would come over all the time to ask her if she told anyone about the things that he does to her.

On 07/18/2018 I met with █████, █████, █████, and █████ at police headquarters to show them Photo Lineups created by the Missouri Information Analysis Center that contained Zachary Sprowls. █████. and █████ were individually brought into an interview room to view the lineup. Both selected Zachary Sprowls from the MIAC lineup. Both picked him by number and identified him by name. Both marked the selection with a circle and wrote either their initial or name. The presentations of the lineups were recorded with audio and video.

On 07/30/2018 at approximately 0930 hours I escorted Zachary Sprowls from the detention unit to interview room 327 on the third floor of Police Headquarters in the Investigations Unit for an interview. Audio and video recording equipment was activated prior to the interview. At approximately 0940 hours Sprowls was presented with a warning of Miranda Rights form. The form was read aloud and initialed after each warning by Sprowls, acknowledging that he understood his rights. Sprowls was confronted with the allegations █████ made against him and confessed to the following events between 2016 and 2018. He was unsure of exact dates but stated █████ would have been seven (7) years of age at the time of the first encounter.

- He claimed tickling █████ escalated to touching her over the clothing on her vagina and anus. On some of the occasions he pushed his fingers against her with enough force that his finger and the material from her clothing went slightly into her vagina. Other times she was naked from the waist down and he touched her on her bare skin. She told him that it hurt and it made him stop what he was doing. He stated that he inserted his fingers into her vagina slightly which was what caused her pain.

- Numerous times while █████ was between the ages of seven (7) and nine (9) years old he would have her sit on his lap or she would voluntarily sit on her lap. Numerous times he would get a partial or full erection after she would "grind" on him like a "lap dance" or while he stroked his erect penis against her vagina. He stated that he was sexually aroused from the contact and believed █████ was aroused as well and had "provoked" him into the sexual contact. He stated she was willing until it hurt and then he would stop. He estimated she was naked from the waist down and his penis was exposed about half of the contacts. The other half she was either fully dressed or he was fully dressed or perhaps she was dressed and his penis was exposed. When asked how many times there was sexual contact he claimed it was approximately fifty (50) times since 2016.

- During one of the times █████ was on his lap he pulled her bathing suit to the side and allowed his exposed penis to slide inside of her. He ejaculated inside of her during that contact. It lead to him having a discussion with her about the use of condoms. He said he was really worried about ejaculating inside of her vagina. █████ was seven (7) years old at the time.

- Another time Sprowls had █████ on his lap while he was on the couch at her residence. He had her vagina exposed and his penis exposed. He rubbed on her until he ejaculated but it was not inside of her. It occurred between 2016 and 2017 making █████ between the ages of seven (7) and nine (9) years old.

- █████ was naked in her room on an occasion when Sprowls walked in on her. He exposed his penis and rubbed on her vagina. He claimed that it was giving her pleasure but when it started to hurt her he stopped. . █████ was between the ages of seven (7) and nine (9) years old.

- He recalled the time [REDACTED] was in a car with him and alleged he put his hand down her pants to rub on her vagina. He stated it occurred because he was reaching for a phone that she had between her legs. The vehicle hit a bump and his hand inserted between her pants and underwear. [REDACTED] was between the ages of seven (7) and nine (9) years old.

- Sprowls admitted to performing oral sex on L.O. on at least two (2) occasions. He licked her vagina over clothing on one incident and the other was during an encounter when she was naked. During one of the times that she was naked he ejaculated on her anus and lower back. He claimed she wanted to lick the semen from his penis and he allowed her to do so. She spit it out after it got into her mouth.

- When asked how many times he ejaculated during sexual contact he claimed it was approximately five (5) times total. Once which was the incident when [REDACTED] was seven (7) when he ejaculated inside of her and the other times [REDACTED] was between the ages of seven (7) and nine (9) years old when he ejaculated on her anus and lower back after rubbing his penis on her vagina and anal area.

- When asked about pornographic pictures pictures Sprowls stated he took a few pictures of [REDACTED]'s buttocks and she had taken some for him herself. He stated the pictures were on a phone that was ruined and his current phone had previously help those photos but they were deleted. Sprowls voluntarily provided his phone for evidential analysis and stated he knew the police could possibly recover the photographs which he knew was child pornography. He claimed he never showed the photos to anyone and had them so he could masturbate to them. He also admitted [REDACTED] had seen pornography his phone to which included pictures of his penis. He claimed after seeing the picture of his penis on his phone [REDACTED] wanted to see his penis in person. He exposed his penis and she stroked it with her hand. He claimed he did not ejaculate because she did not do it long enough to cause ejaculation.

- Regarding the incident [REDACTED] disclosed in the kitchen on the counter, Sprowls stated that did happen but it was over the clothing. At first he said [REDACTED] slipped trying to get a cup of water but he later stated she was seated on the counter and when her mother left the room he exposed his penis and rubbed it against her vagina while she was wearing yoga pants.

- Sprowls admitted that he knew what he during the approximately fifty (50) sexual encounters with [REDACTED] was wrong and against the law. He also knew that possessing child pornography and taking pictures (producing) was wrong and against the law. He stated he wanted to tell His father and [REDACTED]'s mother what he was doing, but it caught up to him before he could. He claimed to have told [REDACTED] not to tell anyone and told her he would be mad if she did because he wanted to be the one to tell people. Sprowls admitted to knowing [REDACTED] was only seven (7) to nine (9) years old at the time of the approximately fifty (50) sexual encounters, the last being this year while she was nine (9).

Detective Jaime L. Harraman

/S/Jaime L. Harraman #1461

Print Name

Signature