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CLERK OF THE BARTON COUNTY DISTRICT COURT
CASE NUMBER: 2018-CR-000555
State's Filing #1
(Complaint - Younger)

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IN THE DISTRICT COURT OF BARTON COUNTY, KANSAS
TWENTIETH JUDICIAL DISTRICT

STATE OF KANSAS,	)	
Plaintiff,	)	
vs.	)	
	)	
KIMBERLEY S. YOUNGER,	)	**Case No. 2018 CR ___**
Defendant.	)	

COMPLAINT

The State of Kansas, by and through Derek L. Schmidt, duly elected and qualified Kansas Attorney General, and Victor J. Braden, duly appointed and qualified Deputy Kansas Attorney General, alleges and states against the defendant, **Kimberley S. Younger**:

COUNT ONE
CAPITAL MURDER
Off-Grid Person Felony

That on or about the 14th day of July, 2018, in Barton County, Kansas, **Kimberley S. Younger** (DOB: 05/25/1966) did unlawfully, feloniously, intentionally, and with premeditation, kill Alfred Carpenter, Jr.; did unlawfully, feloniously, intentionally, and with premeditation, kill Pauline Carpenter; as part of two or more acts or transactions connected together or constituting parts of a common scheme or course of conduct.

Section violated:
K.S.A. 21-5401(a)(6), and amendments thereto; and
K.S.A. 21-5210, and amendments thereto.

Penalty sections:
K.S.A. 21-5401(c), and amendments thereto;
K.S.A. 21-6806(c), and amendments thereto;
K.S.A. 21-6617(a), and amendments thereto; and
K.S.A. 21-6620(a)(1), and amendments thereto.

OR, IN THE ALTERNATE TO COUNT ONE, COUNT TWO

COUNT TWO
MURDER IN THE FIRST DEGREE (PREMEDITATED)
Off-Grid Person Felony

That on or about the 14th day of July, 2018, in Barton County, Kansas, **Kimberley S. Younger**, did unlawfully, feloniously, intentionally, and with premeditation, kill Alfred Carpenter, Jr.

Section violated:
K.S.A. 21-5402(a)(1), and amendments thereto; and
K.S.A. 21-5210, and amendments thereto.

Penalty sections:
K.S.A. 21-5402(b), and amendments thereto;
K.S.A. 21-6806(c), and amendments thereto;
K.S.A. 21-6620(c), and amendments thereto; and
K.S.A. 21-6623, and amendments thereto.

ALSO, IN THE ALTERNATE TO COUNT ONE, COUNT THREE

COUNT THREE
MURDER IN THE FIRST DEGREE (PREMEDITATED)
Off-Grid Person Felony

That on or about the 14th day of July, 2018, in Barton County, Kansas, **Kimberley S. Younger**, did unlawfully, feloniously, intentionally, and with premeditation, kill Pauline Carpenter.

Section violated:
K.S.A. 21-5402(a)(1), and amendments thereto; and
K.S.A. 21-5210, and amendments thereto.

Penalty sections:
K.S.A. 21-5402(b), and amendments thereto;
K.S.A. 21-6806(c), and amendments thereto;
K.S.A. 21-6620(c), and amendments thereto; and
K.S.A. 21-6623, and amendments thereto.

COUNT FOUR
CONSPIRACY TO COMMIT FIRST DEGREE MURDER (PREMEDITATED)
Severity Level 2 Person Felony

That on or between the 11th day of July, 2018, and the 14th day of July, 2018, in Barton County, Kansas, **Kimberley S. Younger**, did unlawfully, feloniously and knowingly agree with another person, to wit: Michael Fowler, to commit or assist in the commission of the crime of murder in the first degree (premeditated), with the intent that murder in the first degree (premeditated) be committed, and Michael Fowler committed an overt act in furtherance of said agreement by shooting Alfred Carpenter, Jr.

Section violated:
K.S.A. 21-5302 and 21-5402(a)(1), and amendments thereto.

Penalty sections:
K.S.A. 21-5402(b), and amendments thereto;
K.S.A. 21-5302(d)(1), and amendments thereto; and
K.S.A. 21-6804, and amendments thereto.

COUNT FIVE
SOLICITATION TO COMMIT FIRST DEGREE MURDER (PREMEDITATED)
Severity Level 3 Person Felony

That on or about the 11th day of July, 2018, in Barton County, Kansas, **Kimberley S. Younger**, did unlawfully, feloniously and intentionally command, encourage, or request Michael Fowler to commit murder in the first degree (premeditated), a felony.

Section violated:
K.S.A. 21-5303 and 21-5402(a)(1), and amendments thereto.

Penalty sections:
K.S.A. 21-5402(b), and amendments thereto;
K.S.A. 21-5303(d)(1), and amendments thereto; and
K.S.A. 21-6804, and amendments thereto.

COUNT SIX
THEFT
Severity Level 7 Non-Person Felony

That on or about the 14th day of July, 2018, in Barton County, Kansas, **Kimberley S. Younger**, did unlawfully, feloniously and knowingly obtain unauthorized control over property, to wit: Dodge Ram Truck with attached Camper and Trailer, and contents therein, with value of at least $25,000 but less than $100,000, owned by Alfred Carpenter, Jr., with the intent to deprive Alfred Carpenter, Jr., permanently of the use or benefit of the property.

Section violated:
K.S.A. 21-5801(a)(1), and amendments thereto.

Penalty sections:
K.S.A. 21-5801(b)(2), and amendments thereto; and
K.S.A. 21-6804, and amendments thereto.

Respectfully submitted,

Derek L. Schmidt, #17781
Kansas Attorney General
120 SW 10th Avenue, Room 200
Topeka, KS 66612
(785) 296-2215
Attorney for the plaintiff

Victor J. Braden, #18524
Deputy Attorney General
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(785) 296-2215
Attorney for the plaintiff

STATE'S WITNESSES

Aguilar, Flavio
Alarcon, Yanelli
Allen, Traci
Arnold, Josh
Atkinson, Charles
Atkinson, Inga
Bailey, David
Bass, Sam
Beckham, Timothy
Bellendir, Brian
Bieberle, Scott
Biggs, Peggy
Bogart, Byron
Bridges, James
Brown, Ron
Butts, William
Camacho, Heriberto
Carpenter, Nathan
Carranza, Esteban
Castro, Patrick
Cole, Joe
Cowett, Todd
Craig, Adam
Crims, Dwayne
Crims, Nakia
Cuthbert, Shannon
Damante, James
Dawa, Michael
Depaz, Donal
DeYoung, Ryan
Diaz, Dario
Drake, Thomas
Dugan, Kevin
Elizalde, Nikki
Erickson, Stephen
Eversole, Shae
Firestine, Shawn
Fowler, Michael
Fox, Sparky
Franklin, Marvin
Frasier, Rusty
Friedlein, Daniel
Garcia, Jose
Gibson, Amanda
Gill, Jarrod
Glasscock, Aaron
Gomez, Brayan
Gonzales, Juan
Gonzales, Oscar
Gonzales, Ricardo
Halls, Nicholas
Haralson, Joe
Haselhorst, Leon
Hawkins, Clint
Hernandez, Augustino
Hernandez-Perdono, Carlos
Hoffsommer, Heather
Horton, Evan
Huff, Donald
Incarnacion, Bernadino
Inman, John
Jacobs, Robert
Jeska, Christopher
Jimenez, Dolores
Jones, John
Jones, Mark
Jones, Tiffany
Kampling, Brock
Kendrick, Mark
King, Verla
King, Zach
Kirl, Brandy
Kokes, Charles
Lacy-Trostle, Diane
Latham, Cory
Latham, Holly
Lee, Kristi
Lee, Zach
Legg, Cynthia
Linnehan, Michael
Lucas, Logan
Lussman, Robert
Luther, Julie
Mares, Marianna
Mares, Tina
Martinez, Arturo
Maurico, Antonio
McCormick, Denny

McCormick, Luke
McCullough, Laura
McGoldrick, Sharon
McGrew, Matthew
McLemore, Heather
McVay, Jeffrey
Mendoza, Oscar
Middleton, Brett
Miranda, Sergio
Moomey, Roy
Moore, Eric
Murrieta, Luis
Murrieta, Rodrigo
Ortega, Luis
Otto, Brenda
Paden, David
Peppas, Nick
Perry, Daniel
Perry, Daniel
Pfeifer, Cindy
Pfeifer, Cynthia
Pfeifer, Mark
Pindo, Samuel Vasquez
Porter, Tyler
Quojano, Julio
Rausch, Michelle
Reyes, John
Reyes, Tomas
Reynolds, John
Rhoades, Ashley
Ripp, Shelley
Rivera, Rene
Romero, Celso
Rose, Rodney
Schomaker, Ryan
Seals, Warren
Sedano-Ponce, Luis
Sellers, Cheryl
Sellers, Julie
Settle, Jason
Shaw, Bill
Simmons, David
Slayton, Megan
Smith, Donna
Smith, Heather
Smith, Randall
Snodgrass, Dustin
Sparks, Savannah
Spencer, Lonnie
Spencer, Scott
Spruell, Rick
Stover, Tyler
Stroud, Patti
Surowicz, Deborah
Taylor, Brandon
Tenney, Christine
Threet, Donnie
Unger, David
Valdivia, Hayley
Viney, Fred
Volkel, Brian
Wagner, Jason
Wagner, Maverick
Wagner, Salena
Ward, Jeff
Watkins, Sarah
Wear, Jonathan
Weaver, Steven
White, Sarah
Wilson, Gary

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF Shawnee)

Victor J. Braden, of lawful age, being first duly sworn on oath deposes and states that he is an appointed and qualified Deputy Kansas Attorney General, and is authorized and empowered to prosecute for and on behalf of the State of Kansas and the matters and things set forth and contained in the above and foregoing Complaint are true and correct as he was informed and verily believes.

Victor J. Braden

Victor J. Braden, #18524
Deputy Attorney General
Criminal Litigation Division

Subscribed and sworn to before me this 6th day of December, 2018, by Deputy Attorney General, Victor J. Braden, #18524.

Lucinda A. Smith

Notary Public

LUCINDA A. SMITH
Notary Public - State of Kansas
My Appt. Expires 10-21-19

My term expires: 10-21-19