

Amy Hanley, #20623
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FILED

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GRANT COUNTY KANSAS
CLERK OF THE DISTRICT CT

**IN THE DISTRICT COURT OF GRANT COUNTY, KANSAS
TWENTY-SIXTH JUDICIAL DISTRICT**

STATE OF KANSAS,
Plaintiff,

v.

MONICA GARCIA,
Defendant.

Case No. 2015 CR 791

COMPLAINT / INFORMATION

COMES NOW the State of Kansas, by and through Derek Schmidt, Kansas Attorney General, and Amy Hanley, Assistant Attorney General, and for its Complaint/Information against the Defendant above-named, alleges and states:

COUNT 1

**FIRST DEGREE FELONY MURDER
K.S.A. 21-5402(a)(2)
Off-grid Person Felony**

That on or about July 31, 2015, within Grant County, Kansas, **Monica Garcia** did, unlawfully and feloniously, kill a human being, to wit: S.R.G. (Y.O.B. 2014), in the commission of an inherently dangerous felony, as defined in K.S.A. 21-5402(c)(1)(G),

and amendments thereto, to wit: Abuse of a Child; in violation of K.S.A. 21-5402(a)(2), an off-grid person felony.

COUNT 2

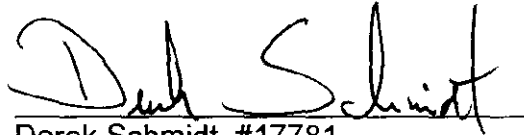
**ABUSE OF A CHILD
K.S.A. 21-5602(a)(1)
Level 5 Person Felony**

That on or about July 31, 2015, within Grant County, Kansas, **Monica Garcia** did unlawfully, feloniously and knowingly, torture or cruelly beat a child under the age of 18 years, to-wit: S.R.G. (Y.O.B. 2014); in violation of K.S.A. 21-5602(a)(1); a level 5 person felony.

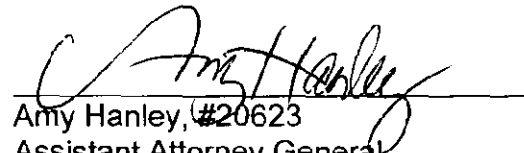
All of the above-said acts then and there committed being contrary to the statutes in such cases made and provided, and being against the peace and dignity of the State of Kansas.

Respectfully submitted,

OFFICE OF THE KANSAS ATTORNEY GENERAL
DEREK SCHMIDT

Handwritten signature of Derek Schmidt in black ink, written over a horizontal line.

Derek Schmidt, #17781
Kansas Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612-1597
Tel: 785-296-2215

Handwritten signature of Amy Hanley in black ink, written over a horizontal line.

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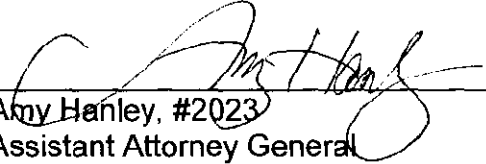
Witness List:

Eva Sierra
Joane Martin
Geneva Pauda
Adam Pauda
Nora Garcia
Amy Orasco
Karina Ochoa
Cruz Ochoa
Adrian Ochoa
Martin Devora
Elizabeth Eastman
Javier Moreno
Darrell Tharp
M.J.G. (dob 11/21/08)
N.E.G. (dob 10/13/11)
S.Z.G. (dob 9/27/13)
Chief Alan Olson – Ulysses PD
Sergeant Ron Vagher – Ulysses PD
SAC Bruce Mellor
SSA John Nachtman
SSA Mark Kendrick
SSA Bethany Popejoy
SSA Jason Larue
SA Chris Nicholson
Dr. Neal Brockbank – Grant County Hospital
Dr. Jon Loewen – Grant County Hospital
Nicole Isherwood – Grant County Hospital
Mitzi Stamey – Grant County Hospital
Dallas Stewart – Grant County Hospital
Stacy Dutton – Grant County Hospital
Jacci Chavez - Grant County Hospital
Jim Ellington – Grant County Hospital
Jada Crapo – Grant County Hospital
Carol Egley – Grant County Hospital
Debra Huddelson – Cimarron Pathology
Dr. Hubert Peterson – District Coroner
Dr. Douglas Johnson – Deputy Coroner
Chris Berry – Frontier Forensics
Dr. Michael Handler – Frontier Forensics

VERIFICATION


STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, Amy Hanley, of lawful age, being first duly sworn upon oath do solemnly swear, that the matters set forth in the foregoing Complaint / Information are, to the best of my knowledge and belief, true. So help me God.



Amy Hanley, #2023
Assistant Attorney General

SUBSCRIBED TO AND SWORN TO before me this 25th day of August, 2015.



Notary Public

