

Melissa G. Johnson, #16601  
Assistant Attorney General  
Kansas Attorney General's Office  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
Topeka, KS 66612-1597  
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Email: melissa.johnson@ag.ks.gov

IN THE DISTRICT COURT OF BARBER COUNTY, KANSAS

STATE OF KANSAS, )  
Plaintiff, )  
 )  
v. ) Case No. 18-CR-\_\_\_\_\_  
 )  
VIRGIL "DUSTY" BREWER, )  
Defendant. )  
 )

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COMPLAINT/INFORMATION

COMES NOW the State of Kansas, by and through Derek Schmidt, the duly elected Attorney General for the State of Kansas and Melissa G. Johnson and C.W. Klebe, duly appointed, qualified and acting Assistant Attorneys General for the State of Kansas, and for its Complaint/Information against the Defendant above-named, alleges and states:

COUNT 1

That on or about October 6, 2017, Virgil D. Brewer, did then and there in Barber County, Kansas, unlawfully, feloniously and recklessly kill a human being, to-wit: Steven Myers.

**INVOLUNTARY MANSLAUGHTER; in violation of K.S.A. 21-5405(a)(1), a Level 5 Person Felony. (Possible prison sentence of 31 to 136 months per K.S.A. 21-6804; up to \$300,000 fine per K.S.A. 21-6611);**

Respectfully submitted,

OFFICE OF THE KANSAS ATTORNEY  
GENERAL DEREK SCHMIDT



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



Melissa G. Johnson, #16601  
Assistant Attorney General  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612-1597



Charles W. Klebe, #22214  
Assistant Attorney General  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612-1597

**Witnesses:**

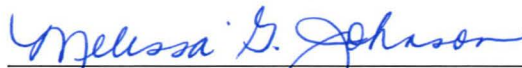
Shawn Adams  
Kayla Adams  
Dan Ailstock  
Ethan Ailstock  
Ted Alexander  
Max Barrett

State v. Virgil "Dusty" Brewer,  
Complaint/Information

SA Tim Beckham  
Anita Belt  
Randall Brewer  
Troy Campbell  
SSA Brian Carroll  
Jim Cooper  
Harry Dawson  
Mica Ensley  
Tim Gorrill MD  
Robert Hall  
SSA Robert Jacobs  
SAC Cory Latham  
Mark Long  
Trudy Mayfield  
Andrew McCloskey  
Richard Meador MD  
David Miller  
Brian Miller  
Marilee Miller  
Adam Mills  
Kristina Myers  
William Myers  
Joshua Roberts  
Leigh Schreinder  
Lonnie Small  
James Stevens  
Mike Stull  
Mark Suchy  
Jeremy Thompson  
Donald Thurber  
Dan West  
Gina Woods  
Garrett Woods  
Jeffrey Woods  
Brendan Wheelock


STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SHAWNEE    )

I, Melissa G. Johnson, of lawful age, being first duly sworn on oath deposes and states that I am a duly appointed Assistant Attorney General acting at the request of the Barber County Attorney Gaten Wood, and I am 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/Information are true and correct as he was informed and believes.

  
\_\_\_\_\_  
Melissa G. Johnson, #16601  
Assistant Attorney General


SUBSCRIBED TO AND SWORN TO before me this 31<sup>st</sup> day of August, 2018.

**Joseph Milavec**  
Notary Public - State of Kansas  
My commission expires: 1-5-14.

  
\_\_\_\_\_  
Notary Public

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SHAWNEE    )

I, Charles W. Klebe, of lawful age, being first duly sworn on oath deposes and states that I am a duly appointed Assistant Attorney General acting at the request of the Barber County Attorney Gaten Wood, and I am 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/Information are true and correct as he was informed and believes.

  
\_\_\_\_\_  
Charles W. Klebe, #22214  
Assistant Attorney General

SUBSCRIBED TO AND SWORN TO before me this 31<sup>st</sup> day of August, 2018.

**Joseph Milavec**  
Notary Public - State of Kansas  
My commission expires: 1-5-19

  
\_\_\_\_\_  
Notary Public

**CERTIFICATE OF SERVICE**

I hereby certify that on this 31<sup>st</sup> day of August, 2018, I filed a true and correct copy of the foregoing Complaint/Information with the Clerk of the District Court by using the electronic filing system.



\_\_\_\_\_  
Melissa G. Johnson, #16601  
Assistant Attorney General