

FILED BY CLERK
K.S. DISTRICT COURT
THIRD JUDICIAL DIST.
TOPEKA, KS.

2016 MAY 24 PM 2 24

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**IN THE KANSAS DISTRICT COURT
THIRD JUDICIAL DISTRICT, SHAWNEE COUNTY, KANSAS
CRIMINAL LAW DIVISION**

**STATE OF KANSAS,
Plaintiff**

vs.

**Case No. 16-CR-834
Division No. 11**

**ERIN MARIE THOMPSON,
Defendant**

COMPLAINT/INFORMATION

COMES NOW, Steven W. Wilhoft, Assistant Attorney General for the State of Kansas,
of lawful age, being first duly sworn on oath, and for complaint/information against the
above named defendant alleges and states:

COUNT ONE:
PERJURY

K.S.A. 21-5903(a)(2)
Severity Level 9 Nonperson Felony

That on or about the 29th day of May, 2015, the above named defendant, within
Shawnee County, Kansas, then and there being present, did contrary to the statutes of the
State of Kansas, unlawfully, feloniously, intentionally and falsely subscribe as true and
correct under penalty of perjury a material matter in any declaration, verification,

certificate or statement as permitted by K.S.A. 53-601, and amendments thereto, in violation of K.S.A. 21-5903(a)(2), and amendments thereto, and against the peace and dignity of the State of Kansas. (Perjury) Severity Level 9 Nonperson Felony, (5-17 months)

Section Violated: K.S.A. 21-5903(a)(2)
Penalty Section: K.S.A. 21-5903(b)(1)

COUNT TWO: K.S.A. 21-5903(a)(2)
PERJURY Severity Level 9 Nonperson Felony

That on or about the 10th day of October, 2014, the above named defendant, within Shawnee County, Kansas, then and there being present, did contrary to the statutes of the State of Kansas, unlawfully, feloniously, intentionally and falsely subscribe as true and correct under penalty of perjury a material matter in any declaration, verification, certificate or statement as permitted by K.S.A. 53-601, and amendments thereto in violation of K.S.A. 21-5903(a)(2), and amendments thereto, and against the peace and dignity of the State of Kansas. (Perjury) Severity Level 9 Nonperson Felony, (5-17 months)

Section Violated: K.S.A. 21-5903(a)(2)
Penalty Section: K.S.A. 21-5903(b)(1)

COUNT THREE: K.S.A. 21-5903(a)(2)
PERJURY Severity Level 9 Nonperson Felony

That on or about the 4th day of August, 2014, the above named defendant, within Shawnee County, Kansas, then and there being present, did contrary to the statutes of the State of Kansas, unlawfully, feloniously, intentionally and falsely subscribe as true and correct under penalty of perjury a material matter in any declaration, verification, certificate or statement as permitted by K.S.A. 53-601, and amendments thereto in

violation of K.S.A. 21-5903(a)(2), and amendments thereto, and against the peace and dignity of the State of Kansas. (Perjury) Severity Level 9 Nonperson Felony, (5-17 months)

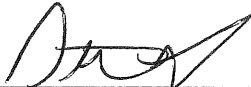
Section Violated: K.S.A. 21-5903(a)(2)
Penalty Section: K.S.A. 21-5903(b)(1)

WITNESSES

The State of Kansas endorses the following witnesses whom the State may call to appear and testify:

Sheriff Herman Jones
Undersheriff Phil Blume
Det. Emily Adams
Lt. Matthew Biltoft
SSA David Brede
Sgt. Andy Dale
Jason E. Geier
Ann Goodall
Capt. Phillip Higdon
SSA Mark Malick
Brian Weis
Ted Baird
Amber Barron
Zebulin Barron
Laine Brumley
Ryan Duncan
Bishop Levi Hays
William "Billy" Rork
Rosie Sweeten
Steven Sandgren
Kevin Shepherd
Jacie J. Spradling
Charles Ward
Shawnee County Sheriff's Department Records Custodian
Verizon Records Custodian

OFFICE OF KANSAS ATTORNEY
GENERAL DEREK SCHMIDT



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STATE OF KANSAS, COUNTY OF CRAWFORD, SS:

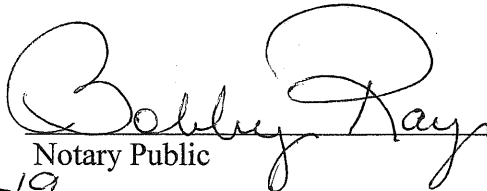
I, Steven W. Wilhoft, do solemnly swear that the matters set forth within the complaint/ information are true and correct to the best of my knowledge and belief.



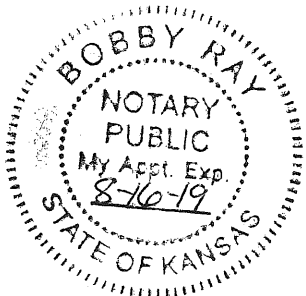
Steven W. Wilhoft
Assistant Attorney General

SUBSCRIBED AND SWORN to before me this 24th day of

May, 2016.


Notary Public

My commission expires: 8-16-19



5,000.00 DJM
BOND REQUEST \$ 10,000.00

- With Prof. Surety
- With Surety
- OR
- Cash
- OR Cash Deposit
- As Set
- Summons to Issue in Lieu of Warrant
- Summons Issued
- No Contact With Victim(s)
- No Weapons
- Bond supervision
- Will extradite
- Will not extradite
- Will extradite from border-states only
- No Possession or consumption of any alcohol/cereal malt beverages or illegal drugs
- Do not operate motor vehicle without a valid license and insurance