

2012 AUG 20 PM 2:28
CLERK OF DISTRICT COURT
GEARY COUNTY

IN THE DISTRICT COURT OF GEARY COUNTY, KANSAS

STATE OF KANSAS, Plaintiff,

 VS. Case No. 2012-CR-000551

JORDAN CHARLES Defendant,
YOUNG

COMPLAINT/INFORMATION

I, Michelle Lorraine Brown, the undersigned Assistant County Attorney of Geary County, in the name and by the authority and on behalf of the State of Kansas, come now here and gives the Court to understand and be informed:

COUNT 1

That on or about and between August 1, 2008 and June 1, 2009, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously entice, command, invite, persuade or attempt to persuade a child under the age of 14 years, to wit: (DOB: XX-XX-1995), to commit or to submit to an unlawful sexual act, to wit: lewd and lascivious behavior. In violation of section 72(b)(1) of chapter 136 of the 2010 Session Laws of Kansas, to be codified at K.S.A. 2011 Supp. 21-5508(b)(1), Aggravated Indecent Solicitation of a Child, a severity level 5 person felony,

COUNT 2


That on or about and between August 1, 2010 and June 1, 2011, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously engage in any lewd fondling or touching of the defendant's person by (DOB: XX-XX-1995), a child 14 or more years of age but less than 16 years of age, done or submitted to with the intent to arouse or to satisfy the sexual desires of the victim, the defendant, or both. In violation of section 31(a)(1) of chapter 30 of the 2011 Session Laws of Kansas, to be codified at K.S.A. 2011 Supp. 21-5506(a)(1),

Indecent Liberties with a Child, a severity level 5 person felony.

COUNT 3

That on or about and between August 1, 2010 and June 1, 2011, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously commit an overt act towards the perpetration of the crime of Criminal Sodomy, to-wit: attempt to engage in anal copulation with (DOB: XX-XX-1995), a child 14 or more years of age, but less than 16 years of age, and done with the intent to commit said crime, but failed in the perpetration thereof or was prevented or intercepted in executing said crime. In violation of section 14 of chapter 30 of the 2011 Session Laws of Kansas, to be codified at K.S.A. 2011 Supp. 21-5301 & section 30(a)(3) of chapter 30 of the 2011 Session Laws of Kansas, to be codified at K.S.A. 2011 Supp. 21-5504(a)(3), Attempted Criminal Sodomy, a severity level 5 person felony.


the same being contrary to and in violation of the laws of the State of Kansas, and against the peace and dignity thereof.



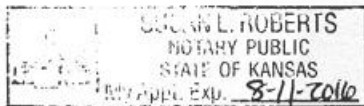
Michelle Lorraine Brown, #16682
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Junction City, KS 66441-2590
Telephone: 785-762-4343

STATE OF KANSAS, COUNTY OF GEARY, ss:

I, Michelle Lorraine Brown, being of lawful age, duly sworn on oath, say that I am the Assistant County Attorney of Geary County, in the State of Kansas and that I am informed and verily believe that the facts and allegations set forth in the within information are true, so help me God.


Michelle Lorraine Brown, #16682
Assistant County Attorney

SUBSCRIBED AND SWORN before me this 20th day of August, 2012.




Notary Public