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2012 SEP -6 PM 12: 00

CLERK OF
THE DISTRICT COURT
GEARY COUNTY

IN THE DISTRICT COURT OF GEARY COUNTY, KANSAS

STATE OF KANSAS, Plaintiff,

VS. Case No. 2012-CR-000607

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

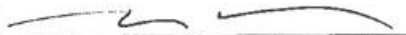
That on or about and between the 1st day of January, 2008 and the 31st day of December, 2011, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously entice, command, invite, persuade or attempt to persuade (DOB: XX-XX-1994), a child under 14 years of age, to enter a room with the intent to commit an unlawful sexual act upon or with the child, to-wit: lewd acts. In violation of K.S.A. 2011 Supp. 21-5508(b)(2), Aggravated Indecent Solicitation of a Child, a severity level 5 person felony.

COUNT 2

That on or about and between the 1st day of January, 2008 and the 31st day of December, 2011, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully, and with the intent to thwart or interfere in any manner with the orderly administration of justice; prevent or dissuade, or attempt to prevent or dissuade a victim or witness or person acting on behalf of a victim or witness, to-wit: (DOB: XX-XX-1994), from making a report of a crime or attempted crime, to a law enforcement, probation, parole, correctional, community correction services or judicial officer, and the act is in furtherance of a conspiracy. In violation of


K.S.A. 2011 Supp. 21-5909(a)(2)(A) & (b)(2), Aggravated Intimidation of a Witness or Victim, a severity level 6 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.

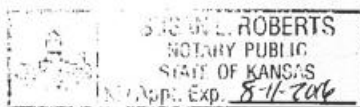

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STATE OF KANSAS, COUNTY OF GEARY, ss:

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 5th day of September, 2012.




Notary Public