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CLERK OF
THE DISTRICT COURT
GEARY COUNTY

IN THE DISTRICT COURT OF GEARY COUNTY, KANSAS

STATE OF KANSAS, Plaintiff,

VS. Case No. 2012-CR-000592

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 March 1, 2012 and April 30, 2012, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously engage in lewd fondling or touching of the person of either the child, to-wit: (DOB: XX-XX-1998), or the offender, done or submitted to with the intent to arouse or to satisfy the sexual desires of either the child or the offender, or both, when said child is under 14 year of age and the offender is 18 years of age or older. In violation of K.S.A. 2011 Supp. 21-5506(b)(3)(A) & (c)(3), Aggravated Indecent Liberties with a Child, an off-grid person felony.

COUNT 2

That on or about and between March 1, 2012 and April 30, 2012, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously engage in oral copulation with (DOB: XX-XX-1998), a child under 14 years of age, and the offender was 18 years of age or older. In violation of K.S.A. 2011 Supp. 21-5504(b)(1) & (c)(3), Aggravated Criminal Sodomy, an off-grid person felony.

COUNT 3

That on or about and between April 1, 2012 and May 31, 2012, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously engage in lewd fondling or touching of the person of either the child, to-wit: [REDACTED] (DOB: XX-XX-1998), or the offender, done or submitted to with the intent to arouse or to satisfy the sexual desires of either the child or the offender, or both, when said child is under 14 year of age and the offender is 18 years of age or older. In violation of K.S.A. 2011 Supp. 21-5506(b)(3)(A) & (c)(3), Aggravated Indecent Liberties with a Child, an off-grid person felony.

COUNT 4

That on or about and between April 1, 2012 and May 31, 2012, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously engage in oral copulation with [REDACTED] (DOB: XX-XX-1998), a child under 14 years of age, and the offender was 18 years of age or older. In violation of K.S.A. 2011 Supp. 21-5504(b)(1) & (c)(3), Aggravated Criminal Sodomy, an off-grid person felony.

COUNT 5

That on or about June 17, 2012, in Geary County, Kansas, Jordan Charles Young, then and there being present did unlawfully and feloniously engage in oral copulation with [REDACTED] (DOB: XX-XX-1998), a child under 14 years of age, and the offender was 18 years of age or older. In violation of K.S.A. 2011 Supp. 21-5504(b)(1) & (c)(3), Aggravated Criminal Sodomy, an off-grid 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.

