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2019 Apr 02 AM 8:08

CLERK OF THE DOUGLAS COUNTY DISTRICT COURT
CASE NUMBER: 2019-JV-000039

In the District Court of Douglas County, Kansas
Judicial & Law Enforcement Center
Juvenile Division
Lawrence, Kansas 66044

In the Matter of:

SAHAVIONE K CARAWAY, Juvenile
DOB XX/XX/2002 [REDACTED]

L19016015

COMPLAINT

Pursuant to K.S.A. 38-2327 and 38-2328

COMES NOW, the State of Kansas, by and through the Assistant District Attorney, BRYANT T BARTON, and alleges as follows:

1. The juvenile named above is a juvenile offender;
2. The full name, date of birth and residence of the alleged juvenile offender are:
SAHAVIONE K CARAWAY
[REDACTED]
[REDACTED]
[REDACTED]
3. The name and residence of the alleged juvenile offender's parent(s) [REDACTED]
[REDACTED]
4. The name and address of any persons having custody or control of the alleged juvenile offender are:
[REDACTED]
[REDACTED]
[REDACTED]
5. The names of the witnesses endorsed by the Complainant are listed at the end of this pleading.

Count 1

That on or about the 29th day of March 2019, in Douglas County, Kansas, one Sahavione K Caraway, did then and there unlawfully and feloniously commit an overt act, to-wit: shot Ulises Elijah Rojo multiple times with a firearm, toward the perpetration of the crime of Murder in the First Degree, as defined by K.S.A. 21-5402(a)(2), with the intent to commit said crime but failed in the perpetration thereof or was prevented or intercepted in executing said crime, all in violation of K.S.A. 21-5301.
(Attempted Murder in the First Degree, Level 1/Person/Felony)

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Count 2

That on or about the 29th day of March 2019, in Douglas County, Kansas, one Sahavione K Caraway, did then and there unlawfully and feloniously commit an overt act, to-wit: shot D.F.R. (DOB: 02/22/2003) multiple times with a firearm, toward the perpetration of the crime of Murder in the First Degree, as defined by K.S.A. 21-5402(a)(2), with the intent to commit said crime but failed in the perpetration thereof or was prevented or intercepted in executing said crime, all in violation of K.S.A. 21-5301. (Attempted Murder in the First Degree, Level 1/Person/Felony)

Count 3

That on or about the 29th day of March 2019, in Douglas County, Kansas, one Sahavione K Caraway, did then and there unlawfully, knowingly, and feloniously take property, to wit: vaplug cartridges, from the person or presence of another, to-wit: Ulises E Rojo, by threat of bodily harm or by force while armed with a dangerous weapon, to wit: Smith & Wesson M&P 15-22, all in violation of K.S.A. 21-5420(b)(1). (Aggravated Robbery, Level 3/Person/Felony)

Count 4

That on or about the 29th day of March 2019, in Douglas County, Kansas, one Sahavione K Caraway, did then and there unlawfully, knowingly, and feloniously take property, to wit: Apple iPhone 6, from the person or presence of another, to-wit: DFR (DOB: 02/22/2003), by threat of bodily harm or by force while armed with a dangerous weapon, to wit: Smith & Wesson M&P 15-22, all in violation of K.S.A. 21-5420(b)(1). (Aggravated Robbery, Level 3/Person/Felony)

The State further requests that the Court enter a child support order against the parents named below, in the event the alleged juvenile offender is removed from the home:



I declare under penalty of perjury that the above and foregoing is true and correct. Executed on Tuesday, April 2, 2019.

/s/ Bryant T Barton

BRYANT T BARTON 19178

Assistant District Attorney

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Witnesses:

Ulises E Rojo
SKC (DOB: 1/12/2002)
BJE (DOB: 12/22/2001)
Randall Faircloth
ARP (DOB: 12/10/2002)
DFR (DOB: 2/22/2003)
Ulisses E Rojo
Steven Wechsler
Daniel Affalter II
George Baker
M Todd Brown
Evidence Officer
Lance B Flachsbarth
Gwyn Fogarty
Trent Froebe
Larry E Hamilton
Adam Kent Heffley
Samuel Hiatt
Donald B Hicks
Jamie Len Lawson
Joshua Leitner
Kimberlee Nicholson
Amy Price
Jana E Ramsey
Records Custodian (LPD)
Micah Stegall
Michael Verbanic