

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

In the Matter of:

BENSON JEROME EDWARDS JR, Juvenile
DOB XX/XX/2001 [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:
BENSON JEROME EDWARDS JR
[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]
[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 Benson Jerome Edwards Jr. did then and there unlawfully and feloniously commit an overt act, to-wit: shot Ulisses 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

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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 2

That on or about the 29th day of March 2019, in Douglas County, Kansas, one Benson Jerome Edwards Jr, 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 Benson Jerome Edwards Jr, 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: Tanfolgio Giuseppe .32, 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 Benson Jerome Edwards Jr, 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: Tanfolgio Giuseppe .32, all in violation of K.S.A. 21-5420(b)(1). (Aggravated Robbery, Level 3/Person/Felony)

Count 5

That on or about the 29th day of March 2019, in Douglas County, Kansas, one Benson Jerome Edwards Jr, did then and there unlawfully and feloniously possess any weapon and the defendant has within the preceding five years been adjudicated as a juvenile offender because of the commission of an act which if done by an adult would constitute the commission of a felony, and was not found to have been in possession of a firearm at the time of the commission of the crime, all in violation of K.S.A. 21-6304(a)(2).
(Criminal possession of a firearm by a convicted felon, Level 8/Non 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:

[REDACTED]

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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