

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

STATE OF KANSAS,

Plaintiff,

vs.

SAMANTHA C ELMER,
2506 Allison Dr, Lawrence, KS 66046

Defendant.

L15079680

INFORMATION

Mark Andrew Simpson, Assistant District Attorney, of lawful age, being first duly sworn on oath, for complaint against the above shown defendant, alleges and states:

Count 1

That on or about 21st day of October, 2015, to the 29th day of October, 2015, in Douglas County, Kansas, one Samantha C Elmer, did then and there unlawfully and feloniously take or entice away any child under the age of 16 years, to-wit: MKB (DOB: 12/08/2005), with the intent to detain or conceal such child from the child's parent, guardian or other person having the lawful charge of such child and takes the child outside the state without the consent of either the person having custody or the court, all in violation of K.S.A. 21-5409(b)(2)(C). (Aggravated Interference with Parental Custody, Level 7/Person/Felony)

OR IN THE ALTERNATIVE:

That on or about 21st day of October, 2015, to the 29th day of October, 2015, in Douglas County, Kansas, one Samantha C Elmer, did then and there unlawfully and feloniously take or entice away any child under the age of 16 years, to-wit: MKB (DOB: 12/08/2005), with the intent to detain or conceal such child from the child's parent, guardian or other person having the lawful charge of such child and detains or conceals the child in an unknown place, whether inside or outside the state, all in violation of K.S.A. 21-5409(b)(2)(F). (Aggravated Interference with Parental Custody, Level 7/Person/Felony)

Count 2

That on or about 21st day of October, 2015, to the 29th day of October, 2015, in Douglas County, Kansas, one Samantha C Elmer, did then and there unlawfully and feloniously take or entice away any child under the age of 16 years, to-wit: TMB (DOB: 06/24/2004), with the intent to detain or conceal such child from the child's parent, guardian or other person having the lawful charge of such child and takes the child outside the state without the consent of either the person having custody or the court, all in violation of K.S.A. 21-5409(b)(2)(C). (Aggravated Interference with Parental Custody, Level 7/Person/Felony)

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Felony Penalty Section: K.S.A. 21-6804

Witnesses:

MKB (DOB: 12/8/2005)

Justin B Bush

Rodney Jason Elmer

Zoe Herrington

Mary Jones

Turkish Airlines Records Custodian

TMB (DOB: 6/24/2004)

Evidence Officer

Caleb Lewis

Records Custodian (LPD)

Amber Rhoden

I declare under penalty of perjury that the above and foregoing is true and correct. Executed on Wednesday, November 04, 2015.

/s/ Mark Andrew Simpson

Mark Andrew Simpson, 23855

Assistant District Attorney

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Lawrence, KS 66044

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