

IN THE DISTRICT COURT OF JOHNSON COUNTY, KANSAS

STATE OF KANSAS,
Plaintiff,

VS.

COMPLAINT

Case No. 11 CR 0568

ROXANNE JANEL JONES,
Defendant.

**NO ALCOHOL
NO DRUGS
NO CONTACT
VICTIM(S) WITNESSES**

STATE OF KANSAS, JOHNSON COUNTY, ss:

I, Vanessa M. Riebli, Assistant District Attorney of said County, being duly sworn on oath state to the Court that

ROXANNE JANEL JONES

**REPORT TO
PROBATION OFFICER**

did the following:

COUNT I - That on or about the 24th day of January, 2011, in the County of Johnson, State of Kansas, ROXANNE JANEL JONES, did then and there unlawfully, feloniously and willfully obtain or exert unauthorized control over property, or obtain by deception control over property, to-wit: money, with the intention to permanently deprive the owner, to-wit: Elizabeth Eng and/or Marty Eng, of the possession, use or benefit of the property, of a value of at least \$1,000.00 but less than \$25,000.00, a severity level 9 non-person felony, in violation of K.S.A. 21-3701, K.S.A. 21-4704 and K.S.A. 21-4707. (theft)

COUNT II - Further, that on or about the 24th day of January, 2011, in the County of Johnson, State of Kansas, ROXANNE JANEL JONES, did then and there unlawfully, willfully and feloniously obtain, possess, transfer, use, sell or purchase any personal identifying information, or document containing the same, to wit: social security number, belonging to or issued to another person, to wit: Salvador G. Gomez, with the intent to defraud that person, or any one else, in order to receive any benefit, a severity level 8, nonperson felony, in violation of K.S.A. 21-4018, K.S.A. 21-4704 and K.S.A. 21-4707. (identity theft)

COUNT III - Further, that on or about the 24th day of January, 2011, in the County of Johnson, State of Kansas, ROXANNE JANEL JONES, did then and there unlawfully and willfully obtain or exert unauthorized control over property, or obtain by deception control over property, to-wit: money or clothing, with the intention to permanently deprive the owner, to-wit: Christian Family Services, of the possession, use or benefit of the property of a value of less than \$1,000.00, a class A non-person misdemeanor, in violation of K.S.A. 21-3701 and K.S.A. 21-4502(1)(a). (theft)

SCAN DATE 2011/03/15 14:55

CLERK OF DISTRICT COURT
JOHNSON COUNTY, KS.

2011 MAR 15 PM 2: 54

Vanessa M. Riebli

Vanessa M. Riebli #19285
Assistant District Attorney
P.O. Box 728
Olathe, Kansas 66051-0728
(913) 715-3000

Subscribed and sworn to before me this 15th day of March, 2011.



M. Ortiz

Notary Public

WITNESSES:

Elizabeth Eng
Detective Reaser
Christian Family Services personnel
Commerce Bank personnel
Deanna Lutz
Rachel Crews
KC Free Clinic personnel

Special Agent Simmons
Susan Timmons
Marty Eng
Heather King
SMMC personnel
Adoption and Beyond personnel

State of Kansas
Vs.
ROXANNE JANEL JONES

11 CR 0568

Case No.
Print-off Date 03/15/2011

INITIATION OF ACTION

Offenses(s) Alleged: 21-3701.9 THEFT >\$1000 <\$25000
21-4018(C).F IDENTITY THEFT
21-3701.M THEFT <\$1000

 The Court finds from the complaint/affidavit that there is probable cause to believe both that a crime has been committed in Johnson County, Kansas and that the defendant committed the same.

 Therefore a warrant is ordered to be issued for the arrest of the above-named defendant.

 The Court finds probable cause for detention of the above-named defendant.

Defendant's bond is set at \$ 25000

- | | |
|---|--|
| <input checked="" type="checkbox"/> Cash or Surety (C/S) | <input type="checkbox"/> Personal Recognizance (P/R) |
| <input type="checkbox"/> O/R Cash Deposit or C/S | <input type="checkbox"/> Bond Supervision |
| <input type="checkbox"/> House Arrest | <input checked="" type="checkbox"/> No Alcohol |
| <input type="checkbox"/> No Driving | <input type="checkbox"/> No Driving w/o Valid D/L |
| <input type="checkbox"/> Interlock Device Installed | <input type="checkbox"/> Mental Health/Medication |
| <input type="checkbox"/> No Firearms | <input type="checkbox"/> SCRAM Device |
| <input checked="" type="checkbox"/> No Contact Victim(s)/Witnesses whether or not he/she posts bond | |
| <input type="checkbox"/> No Violent Contact Victim(s)/Witnesses After 72 Hours | <input type="checkbox"/> Medication as prescribed |
| <input type="checkbox"/> Mental health evaluation prior to bonding | <input checked="" type="checkbox"/> No drugs |
| <input type="checkbox"/> Return to Residential Center | <input type="checkbox"/> Hold PFA |
| <input type="checkbox"/> No Contact w/childern except per civil orders | <input checked="" type="checkbox"/> Report to probation office |
| <input type="checkbox"/> No Violent Contact Victim(s)/Witnesses | |

 Other: _____

 Therefore a summons is ordered issued for the above-named defendant.

 A complaint has been filed and a notice to appear has been issued for the above-named defendant.

For his appearance in Section _____ of the Criminal Department of the District Court on the _____ day of _____, 20__ at _____ : _____ o'clock _____ .M.

Date

Judge of the District Court/Clerk
CLERK OF DISTRICT COURT
JOHNSON COUNTY, KS

Entered by _____

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