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CLERK OF DISTRICT COURT  
MCPHERSON COUNTY, KANSAS

Christine M. T. Ladner, #12414  
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**IN THE NINTH JUDICIAL DISTRICT  
IN THE DISTRICT COURT OF MCPHERSON COUNTY, KANSAS**

STATE OF KANSAS, )  
)  
Plaintiff, )  
)  
v. )  
MICHAEL LELAND AKINS, JR., )  
w/m DOB XX/XX/1971 )  
)  
Defendant. )  
\_\_\_\_\_ )

Case No. 2010 CR 9

**COMPLAINT/INFORMATION**

COMES NOW, Christine M. T. Ladner, Assistant Attorney General, being first duly sworn on oath, for the Complaint/Information against the above shown Defendant, states and alleges as follows:

**COUNT ONE**

**RAPE**

That between the dates of May 1, 2009 and May 14, 2009 the above named Defendant, a person 18 years of age or older, within McPherson County, did unlawfully and feloniously engage in sexual intercourse with a child who is under 14 years of age; to-wit: M.S.B. (DOB: 1995).

*Contrary to Kansas Statutes Annotated 21-3502(a)(2), Rape, an Off-grid Person Felony (life with Hard 25 for first offense).*

**OR, IN THE ALTERNATIVE,**

**COUNT TWO**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of May 1, 2009 and May 14, 2009, the above named Defendant, a person 18 years of age or older, within McPherson County, did unlawfully and feloniously commit an act of lewd fondling or touching of the person of a child who is under 14 years of age to-wit: M.S.B. (DOB: 1995) with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both.

*Contrary to Kansas Statutes Annotated 21-3504(a)(3)(A), Aggravated Indecent Liberties, an Off-grid Person Felony (life with Hard 25 for first offense).*

**COUNT THREE**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of May 15, 2009 and December 18, 2009, the above Defendant, within McPherson County, did unlawfully and feloniously commit an act of sexual intercourse of the person of a child who is 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995).

*Contrary to Kansas Statutes Annotated 21-3504(a)(1), Aggravated Indecent Liberties, a Severity Level 3 Person Felony.*

**COUT FOUR**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of May 15, 2009 and December 18, 2009, the above named Defendant, within McPherson County, did unlawfully and feloniously commit an act of lewd

fondling or touching of the person of a child who is under 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995) with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both, and who did not consent thereto.

***Contrary to Kansas Statutes Annotated 21-3504(a)(2)(A), Aggravated Indecent Liberties, a Severity Level 4 Person Felony.***

#### **COUNT FIVE**

#### **AGGRAVATED INDECENT LIBERTIES**

That between the dates of May 15, 2009 and December 18, 2009, the above Defendant, within McPherson County, did unlawfully and feloniously commit an act of sexual intercourse of the person of a child who is 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995).

***Contrary to Kansas Statutes Annotated 21-3504(a)(1), Aggravated Indecent Liberties, a Severity Level 3 Person Felony.***

#### **COUNT SIX**

#### **INDECENT SOLICITATION OF A CHILD**

That between the dates of May 15, 2009 and December 18, 2009, the above Defendant, within McPherson County, did unlawfully and feloniously entice or solicit a child 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995) to commit or to submit to an unlawful sexual act: to-wit: Aggravated Indecent Liberties contrary to K.S.A. 21-3504(a)(2)(A).

***Contrary to Kansas Statutes Annotated 21-3510(a)(1), Indecent Solicitation of a Child, a Severity Level 6 Person Felony.***

**COUNT SEVEN**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of May 15, 2009 and December 18, 2009, the above named Defendant, , within McPherson County, did unlawfully and feloniously commit an act of lewd fondling or touching of the person of either the child or the offender, the child being a child who is under 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995) done or submitted to with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both, and who did not consent thereto.

*Contrary to Kansas Statutes Annotated 21-3504(a)(2)(A), Aggravated Indecent Liberties, a Severity Level 4 Person Felony.*

**COUNT EIGHT**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of November 18, 2009 and December 2, 2009, the above Defendant, within McPherson County, did unlawfully and feloniously commit an act of sexual intercourse of the person of a child who is 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995).

*Contrary to Kansas Statutes Annotated 21-3504(a)(1), Aggravated Indecent Liberties, a Severity Level 3 Person Felony.*

***OR, IN THE ALTERNATIVE,***

**COUNT NINE**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of November 18, 2009 and December 2, 2009, the above named Defendant, a person 18 years of age or older, within McPherson County, did unlawfully and

feloniously commit an act of lewd fondling or touching of the person of a child who is 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995) with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both and who does not consent thereto.

***Contrary to Kansas Statutes Annotated 21-3504(a)(2)(A), Aggravated Indecent Liberties, an Off-grid Person Felony.***

**COUNT TEN**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of May 15, 2009 and December 18, 2009, the above named Defendant, , within McPherson County, did unlawfully and feloniously commit an act of lewd fondling or touching of the person of a child who is under 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995) with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both, and who did not consent thereto.

***Contrary to Kansas Statutes Annotated 21-3504(a)(2)(A), Aggravated Indecent Liberties, a Severity Level 4 Person Felony.***

**COUNT ELEVEN**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of May 15, 2009 and December 18, 2009, the above named Defendant, within McPherson County, did unlawfully and feloniously commit an act of lewd fondling or touching of the person of a child who is under 14 or more years of age but less than 16 years of age to-wit: M.S.B. (DOB: 1995) with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both, and who did not consent thereto.

***Contrary to Kansas Statutes Annotated 21-3504(a)(2)(A), Aggravated Indecent Liberties, a Severity Level 4 Person Felony.***

**COUNT TWELVE**

**BATTERY**

That between the dates of November 26, 2009 and December 18, 2009, the above named Defendant, within McPherson County, did unlawfully and intentionally caused physical contact with another person to-wit: E.S.B when done in a rude, insulting or angry manner.

***Contrary to Kansas Statutes Annotated 21-3412(a)(2), Battery, a Class B Person Misdemeanor.***

**COUNT THIRTEEN**

**BATTERY**

That between the dates of August 20, 2009 and December 18, 2009, the above named Defendant, within McPherson County, did unlawfully and intentionally caused physical contact with another person to-wit: E.S.B when done in a rude, insulting or angry manner.

***Contrary to Kansas Statutes Annotated 21-3412(a)(2), Battery, a Class B Person Misdemeanor.***

**COUNT FOURTEEN**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of August 20, 2009 and December 18, 2009, the above named Defendant, a person 18 years of age or older, within McPherson County, did unlawfully and feloniously commit an act of lewd fondling or touching of the person of a child who is under 14 years of age to-wit: E.S.B. (DOB: 1996) with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both.

***Contrary to Kansas Statutes Annotated 21-3504(a)(3)(A), Aggravated Indecent Liberties, an Off-grid Person Felony (life with Hard 25 for first offense).***

**COUNT FIFTEEN**

**LEWD AND LASCIVIOUS BEHAVIOR**

That between the dates of August 20, 2009 and December 18, 2009, the above named Defendant, within McPherson County, did unlawfully expose his sex organ in the presence of a person under 16 years of age to-wit: E.S.B. (DOB: 1996) who is not the spouse of the offender and who has not consented thereto, with the intent to arouse or gratify the sexual desires of the offender or another.

*Contrary to Kansas Statutes Annotated 21-3508(a)(2) and (b)(2), Lewd and Lascivious Behavior, a Severity level 9 Person Felony.*

**COUNT SIXTEEN**

**AGGRAVATED INDECENT SOLICITATION OF A CHILD**

That between the dates of July 27, 2009 and December 18, 2009, the above Defendant, within McPherson County, did unlawfully and feloniously entice or solicit a child under the age of 14 to-wit: L.E.B. (DOB: 1999) to commit or to submit to an unlawful sexual act: to-wit: Lewd and Lascivious Behavior pursuant to K.S.A. 21-3508(a)(2).

*Contrary to Kansas Statutes Annotated 21-3511(a), Aggravated Indecent Solicitation of a Child, a Severity Level 5 Person Felony.*

**COUNT SEVENTEEN**

**AGGRAVATED INDECENT SOLICITATION OF A CHILD**

That between the dates of July 27, 2009 and December 18, 2009, the above Defendant, within McPherson County, did unlawfully and feloniously entice or solicit a child under the age of 14 to-wit: L.E.B. (DOB: 1999) to commit or to submit to an unlawful sexual act: to-wit: Lewd and Lascivious Behavior pursuant to K.S.A. 21-3508(a)(2).

***Contrary to Kansas Statutes Annotated 21-3511(a), Aggravated Indecent Solicitation of a Child, a Severity Level 5 Person Felony.***

**COUNT EIGHTEEN**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of July 27, 2009 and December 18, 2009, the above named Defendant, a person 18 years of age or older, within McPherson County, did unlawfully and feloniously commit an act of lewd fondling or touching of the person of either the child or the offender, the child being a child who is under 14 years of age to-wit: L.E.B. (DOB: 1999) done or submitted to with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both.

***Contrary to Kansas Statutes Annotated 21-3504(a)(3)(A), Aggravated Indecent Liberties, an Off-grid Person Felony (life with Hard 25 for first offense).***

**COUNT NINETEEN**

**AGGRAVATED INDECENT LIBERTIES**

That between the dates of December 27, 2008 and December 18, 2009, the above named Defendant, a person 18 years of age or older, within McPherson County, did unlawfully and feloniously commit an act of lewd fondling or touching of the person of either the child or the offender, the child being a child who is under 14 years of age to-wit: J.M.B. (DOB: 2000) done or submitted to with the intent to arouse or satisfy the sexual desires of either the child or the offender, or both.

***Contrary to Kansas Statutes Annotated 21-3504(a)(3)(A), Aggravated Indecent Liberties, an Off-grid Person Felony (life with Hard 25 for first offense).***

OFFICE OF THE ATTORNEY GENERAL  
STEPHEN N. SIX



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Topeka, KS 66612-2215  
(785) 296-2215

STATE OF KANSAS            )  
  ) ss.  
COUNTY OF MCPHERSON)

I, Christine M. T. Ladner, do solemnly swear that the matters set forth in the above Amended Complaint/Information are to the best of my information and belief, true, so help me God.



Christine M. T. Ladner #12414  
Assistant Attorney General

SUBSCRIBED AND SWORN to before me this 12 day of January, 2010



Judge

Warrant Issued – Appearance Bond requirement is \$ 250,000.

WITNESSES

SSA Roger D. Butler, KBI

MPSO Det. C.A. Hanson #615

David Page, McPherson County Attorney

Clerk of the District Court, Ninth Judicial District, duces tecum

Jennifer Kay Akins

MSB

ESB

LEB

JMB

KCB

NFB

Kelly Robbins

David Fyler

Wilma Mueller, SRS

Records Custodian of school calendar USD 448

Odessa Snyder

Timothy Sterling Brewer

Marlene Beesen