ELECTRONICALLY FILED
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CLERK OF THE FRANKLIN COUNTY
CASE NUMBER: FR-2021-CR-000129
PII COMPLIANT

IN THE DISTRICT COURT OF FRANKLIN COUNTY, KANSAS
FOURTH JUDICIAL DISTRICT

STATE OF KANSAS,

Plaintiff,

vs.

MARK A. SAMSEL,

Defendant.

COMPLAINT

I, Brandon L. Jones, Franklin County Attorney, of lawful age, being first duly sworn on oath, for complaint against the above-named defendant, alleges and states:

COUNT 1 - BATTERY

That on or about April 28, 2021, in Franklin County, Kansas, **MARK A. SAMSEL** did unlawfully and knowingly or recklessly cause bodily harm to another person, to wit: T.L.E. (DOB: xx/xx/2005), or knowingly cause physical contact with another person, to-wit: T.L.E. (DOB: xx/xx/2005), done in a rude, insulting, or angry manner, **a class B person misdemeanor**, in violation of K.S.A. 21-5413(a)(1), (a)(2), & (g)(1).

Penalty Range: From up to 6 months in the county jail and/or a fine up to $1,000, pursuant to K.S.A. 21-6602(a)(2) & 21-6611(b)(2), and amendments thereto.

COUNT 2 - BATTERY

That on or about April 28, 2021, in Franklin County, Kansas, **MARK A. SAMSEL** did unlawfully and knowingly or recklessly cause bodily harm to another person, to wit: T.L.E. (DOB: xx/xx/2005), or knowingly cause physical contact with another person, to-wit: T.L.E. (DOB: xx/xx/2005), done in a rude, insulting, or angry manner, **a class B person misdemeanor**, in violation of K.S.A. 21-5413(a)(1), (a)(2), & (g)(1).

Penalty Range: From up to 6 months in the county jail and/or a fine up to $1,000, pursuant to K.S.A. 21-6602(a)(2) & 21-6611(b)(2), and amendments thereto.

COUNT 3 - BATTERY

That on or about April 28, 2021, in Franklin County, Kansas, **MARK A. SAMSEL** did unlawfully and knowingly cause physical contact with another person, to-wit: J.G. (DOB: xx/xx/2005), done in a rude, insulting, or angry manner, **a class B person misdemeanor**, in violation of K.S.A. 21-5413(a)(2) & (g)(1).

Penalty Range: From up to 6 months in the county jail and/or a fine up to $1,000, pursuant to K.S.A. 21-6602(a)(2) & 21-6611(b)(2), and amendments thereto.

The State hereby endorses the following **WITNESSES** whom the State may call to appear and testify:

Joshua A. Adams
M.A. (DOB: xx/xx/2005)
Ryan T. Adams
Jaquelyn Bauer
E.L.B. (DOB: xx/xx/2006)
John T. Bird
Corporal T. Brooks - FRSO
Alise M. Chandler
K.C. (DOB: xx/xx/2006)
M.C. (DOB: Unknown)
Police Officer B. Davenport - WPD
Charles R. Ellis
Sherry D. Ellis
T.L.E. (DOB: xx/xx/2005) – Victim
Ariana L. Englehart
L.F. (DOB: Unknown)
E.F. (DOB: xx/xx/2005)
Timothy S. Farquhar
J.G. (DOB: xx/xx/2005) – Victim
C.M.G. (DOB: xx/xx/2003)
R.H. (DOB: xx/xx/2006)
Detective W. Hargesheimer - FRSO
Jerry A. Hunsaker, Jr.
J.R.H. (DOB: xx/xx/2005)
Jodi R. Hylton
Lieutenant K. Lasswell - FRSO
Kaylie M. Reese
M.R. (DOB: xx/xx/2005)
Deputy Sheriff B. Rivers - FRSO
LeeAnn Samsel
Robert M. Samsel

A.M.L.T. (DOB: xx/xx/2006)
Gregory S. Taylor
Deputy Sheriff C. Thompson - FRSO
Sergeant J. Vega - FRSO
Wellsville Police Department Personnel - WPD
D.A.S.W. (DOB: xx/xx/2005)
Mark W. Winton
Jessica A. Zeck
J.Z. (DOB: xx/xx/2006)

FRSO Case # F2021-000449

Respectfully Submitted,

/s/Brandon L. Jones
Brandon L. Jones, #19858
Franklin County Attorney
Franklin County Attorney's Office
220 South Beech Street, Suite B
Ottawa, Kansas 66067
(785) 229-8970
(785) 229-8971 (fax)
bjones@franklincoks.org

SUBSCRIBED AND SWORN before me this 17th day of May 2021.

Notary Public

My appointment expires: NOTARY PUBLIC - State of Kansas Noel K. Young My Appt. Exp. 01/10/23

<u>Notice</u>: Pursuant to K.S.A. 22-2907, you are advised the Franklin County Attorney's Office has a diversion program in place and has adopted written policies relating to the administration of this program. If you are considering applying for diversion, you must initiate this process immediately. Please visit www.franklincoks.org for more information.