

File in Division 13 (New Case Assignment)

KBI KBI22-628

**IN THE KANSAS DISTRICT COURT
THIRD JUDICIAL DISTRICT, SHAWNEE COUNTY, KANSAS
CRIMINAL LAW DIVISION**

**STATE OF KANSAS,
Plaintiff,**

vs.

**Case No.
DA No. 23-3614
Division No. _____**

**ANASTACIA MARIE ARNOLD,
Defendant.**

COMPLAINT/INFORMATION

COMES NOW, Kevin S Keatley, a duly appointed, qualified and acting Deputy District Attorney of the Third Judicial District of the State of Kansas, and for and on behalf of said State gives the court to understand and be informed that:

COUNT 1

THEFT BY DECEPTION; \$25,000 TO \$100,000
K.S.A. 21-5801(a)(2),(b)(2)
Level 7, Nonperson Felony

On or about the 18th day of March, 2020 through the 14th day of May, 2022 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully and feloniously, obtain control over property or services by deception, to-wit: U.S. Currency, and with the intention to permanently deprive the owner, to-wit: Kansas Bar Association, of the possession, use or benefit of said property, having a value of at least \$25,000 but less than \$100,000, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 2

UNLAWFUL ACTS CONCERNING COMPUTERS

K.S.A. 21-5839(a)(2)

Level 8, Non Person Felony

On or about the 18th day of March, 2020 through the 14th day of May, 2022 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and knowingly use a computer, computer system, computer network or any other property for the purpose of devising or executing a scheme or artifice with the intent to defraud or for the purpose of obtaining money, property, services or any other thing of value by means of false or fraudulent pretense or representation, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 3

FORGERY; MAKING, ALTERING, OR ENDORSING

K.S.A. 21-5823(a)(1)

Level 8, Non Person Felony

On or about the 20th day of March, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #30886 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 4

FORGERY; ISSUING OR DISTRIBUTING

K.S.A. 21-5823(a)(2)

Level 8, Non Person Felony

On or about the 20th day of March, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #30886 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 5
FORGERY; MAKING, ALTERING, OR ENDORSING
K.S.A. 21-5823(a)(1)
Level 8, Non Person Felony

On or about the 11th day of May, 2020 through the 12th day of May, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #30926 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 6
FORGERY; ISSUING OR DISTRIBUTING
K.S.A. 21-5823(a)(2)
Level 8, Non Person Felony

On or about the 12th day of May, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #30926 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 7
FORGERY; MAKING, ALTERING, OR ENDORSING
K.S.A. 21-5823(a)(1)
Level 8, Non Person Felony

On or about the 1st day of May, 2020 through the 21st day of May, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #30945 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 8

FORGERY; ISSUING OR DISTRIBUTING

K.S.A. 21-5823(a)(2)

Level 8, Non Person Felony

On or about the 21st day of May, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #30945 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 9

FORGERY; MAKING, ALTERING, OR ENDORSING

K.S.A. 21-5823(a)(1)

Level 8, Non Person Felony

On or about the 29th day of May, 2020 through the 1st day of June, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #30954 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 10

FORGERY; ISSUING OR DISTRIBUTING

K.S.A. 21-5823(a)(2)

Level 8, Non Person Felony

On or about the 1st day of June, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #30954 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 11

FORGERY; MAKING, ALTERING, OR ENDORSING

K.S.A. 21-5823(a)(1)

Level 8, Non Person Felony

On or about the 23rd day of June, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #30986 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 12

FORGERY; ISSUING OR DISTRIBUTING

K.S.A. 21-5823(a)(2)

Level 8, Non Person Felony

On or about the 23rd day of June, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #30986 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 13

FORGERY; MAKING, ALTERING, OR ENDORSING

K.S.A. 21-5823(a)(1)

Level 8, Non Person Felony

On or about the 26th day of June, 2020 through the 30th day of June, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #30993 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 14

FORGERY; ISSUING OR DISTRIBUTING

K.S.A. 21-5823(a)(2)

Level 8, Non Person Felony

On or about the 30th day of June, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #30993 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 15
FORGERY; MAKING, ALTERING, OR ENDORSING
K.S.A. 21-5823(a)(1)
Level 8, Non Person Felony

On or about the 14th day of July, 2020 through the 15th day of July, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #31005 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 16
FORGERY; ISSUING OR DISTRIBUTING
K.S.A. 21-5823(a)(2)
Level 8, Non Person Felony

On or about the 15th day of July, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #31005 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 17
FORGERY; MAKING, ALTERING, OR ENDORSING
K.S.A. 21-5823(a)(1)
Level 8, Non Person Felony

On or about the 31st day of July, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #31017 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 18

FORGERY; ISSUING OR DISTRIBUTING

K.S.A. 21-5823(a)(2)

Level 8, Non Person Felony

On or about the 31st day of July, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #31017 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

COUNT 19

FORGERY; MAKING, ALTERING, OR ENDORSING

K.S.A. 21-5823(a)(1)

Level 8, Non Person Felony

On or about the 14th day of August, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: Check #31041 on the Kansas Bar Association bank account at Core First Bank and Trust, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or at another time; or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

OR IN THE ALTERNATIVE

COUNT 20

FORGERY; ISSUING OR DISTRIBUTING

K.S.A. 21-5823(a)(2)

Level 8, Non Person Felony

On or about the 20th day of March, 2020 in the State of Kansas and County of Shawnee, Anastacia Marie Arnold, did, then and there, unlawfully, feloniously, and with the intent to defraud, issue or distribute a written instrument, to-wit: Check #31041 on the Kansas Bar Association bank account at Core First Bank and Trust, knowing it to have been made, altered, or endorsed so that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Karla Whitaker or with different provisions; or by the authority of another, to-wit: Karla Whitaker, who did not give such authority, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

Witnesses

The State of Kansas endorses the following witnesses whom the State may call to appear and testify:

AMR Personnel
Crystal Hornseth, #
Karla Whitaker
Shande Chapman
Deputy Darrin Marr
Kansas Bar Association
KBI Lab Personnel
Melanie Roberts
Sergeant Scott L Wanamaker
Shawnee County Dispatch Personnel
Topeka Fire Personnel

Kevin S Keatley, Deputy District Attorney for the Third Judicial District of Kansas, within and for said State being first duly sworn states that I have read the above and foregoing Complaint/Information and know the content thereof, and that the same is true in substance and in fact to my best information and belief.

By: / Kevin S Keatley/
Kevin S Keatley,#25047
Deputy District Attorney
200 SE 7th Street, Suite 214
Topeka, KS 66603
(785) 251- 4330
(785) 251-4909 (FAX)

I verify under penalty of perjury that the foregoing is true and correct.

Executed on this 19 day of July, 2023.

By: / Kevin S Keatley/
Kevin S Keatley,#25047
Deputy District Attorney

BOND REQUEST \$ 2500

With Prof. Surety/Cash

OR

As Set

Summons to Issue in Lieu of Warrant

No Contact With Victim

No Contact With Co-Defendants/Co-Respondents

No Contact With Witnesses

No Weapons

Bond supervision

GPS Monitor

All Conditions as previously ordered on the bond set form

No Possession or consumption of any alcohol/cereal malt beverages or illegal drugs

Do not operate motor vehicle without a valid license and insurance

Remain law abiding

Will extradite

Will not extradite

Will extradite from border-states only

Accelerated Diversion Docket Setting Needed

Docket Date:

Note: The diversion policy of the Shawnee County District Attorney can be found at
<http://www.snco.us/da/>