

Adam Y. Zentner, #25044  
Assistant Attorney General  
Kansas Attorney General's Office  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
Topeka, KS 66612-1597  
Phone: (785) 296-2215  
Fax: (785) 291-3875  
Email: adam.zentner@ag.ks.gov

**IN THE DISTRICT COURT OF MARSHALL COUNTY, KANSAS**

STATE OF KANSAS,	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2019-CR-_____
	)	
Sonya Laurette Stohs,	)	
Defendant.	)	
	)	

---

**COMPLAINT INFORMATION**

The State of Kansas, by and through Adam Y. Zentner, Assistant Attorney General, and submits the following information:

**Count 1**

Between and including May 29, 2013, and April 4, 2019, in Marshall County, Kansas, **Sonya Laurette Stohs**, then having control of public money by virtue of her official position, to wit: Marshall County Clerk, did unlawfully, feloniously, and knowingly use public money in a manner not authorized by law, to wit: private benefit or gain, and the aggregate amount of money paid or claimed contrary to this section is more than \$100,000.00, in violation of K.S.A. 21-6005(a) & (b)(1)(A), Misuse of Public Funds, a severity level 5 nonperson felony.

**Witnesses:**

Ackerman, Tim (Undersheriff)  
Ackerman, Todd (MPD)  
Baier, David (Commissioner, Chairman)  
Bramhall, Keith (Commissioner)  
Ellenbecker, Jami (Treasurer)  
Hargrave, Daniel (Sheriff)  
Heinen, Mary Ann (Payroll Clerk)  
Jackson, Samantha (Time Clock Clerk)  
Kickhaefer, Barbara (Commissioner)  
Knop, Dennis  
Kueny, Mary  
Ray, Cheryl Ann  
Ray, Kyle  
Ray, Neil P.  
Salcedo, Danielle (Accounts Payable Clerk)  
Stohs, Broderick  
Stohs, Grace  
Stohs, Gregory  
Wetter, Mary Ellen  
Wilson, Sandra (Deputy County Clerk)

*Kansas Bureau of Investigation (KBI)*

Beabout, Robert  
Besenyi, Robert  
Blanton, Karen  
Bridges, James  
Bundy, Steve  
Burk, Ronnie  
Gillespie, Steve  
Gill, Jarrod  
Hachmeister, Aaron  
Herrera, Andy

Hornseth, Crystal  
King, Verla  
Marks, Crystal  
Miller, Pamela  
O'Neal, Jerry  
Purling, Nathan  
Smith, Bill  
Stokes, Jeff  
Underwood, Jared  
Weisgerber, Melissa

*United States Secret Service (USSS)*

Albin, Chad  
Johnson, Terry  
Matushek, Andrew  
Seubert, John

*Record custodians*

Amazon  
AT&T  
DirectTV  
Dish Network  
First Commerce Bank – Card Services  
Genesis Pure  
Kansas Gas Service  
Nationwide Insurance  
Plexus Worldwide LLC  
Prosperity Bank  
Stitch Fix Clothing  
Ulta Beauty  
Verizon Wireless  
Wal-Mart  
Westar Energy

I certify under penalty of perjury that the contents of this document are true and correct to the best of my knowledge and belief.

OFFICE OF KANSAS ATTORNEY GENERAL  
DEREK SCHMIDT

/s/ Adam Y. Zentner  
Adam Y. Zentner, #25044  
Assistant Attorney General  
Kansas Attorney General's Office  
120 SW 10<sup>th</sup> Avenue, 2<sup>nd</sup> Floor  
Topeka, KS 66612-1597  
Phone: (785) 296-2215  
Fax: (785) 291-3875  
Email: adam.zentner@ag.ks.gov