

Paul E. Brothers, #26863  
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**IN THE NINTH JUDICIAL DISTRICT  
DISTRICT COURT OF MCPHERSON COUNTY, KANSAS**

**STATE OF KANSAS**

**v.**

**Case No. \_\_\_\_\_**

**TINA NICOLE BROWN,**

**Defendant.**

**COMPLAINT/INFORMATION**

COMES NOW, the State of Kansas by and through Derek L. Schmidt, Kansas Attorney General, and Paul E. Brothers, Assistant Attorney General, and gives the Court to understand and be informed that:

**COUNT ONE**

**MURDER IN THE FIRST DEGREE**

**K.S.A. 21-5402(a)(2)(b) & (c)(1)(V)**

**Off-Grid Person Felony**

That on or about the 24th day of February, 2020, in McPherson County, Kansas, Tina Nicole Brown did then and there, unlawfully and feloniously kill a human being, to wit: Kelly G. Peterson, in the commission of, attempt to commit, or flight from a inherently dangerous felony, to wit: mistreatment of an elder person as defined in K.S.A. 21-5417(a)(1), contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

**Penalty Sections: K.S.A. 21-6804, K.S.A. 21-6806, K.S.A. 21-6620, K.S.A. 21-6611, & K.S.A. 22-3717**

**Penalty Range: Life imprisonment in the custody of the Secretary of Corrections, with a mandatory minimum term of imprisonment of not less than 25 years or a sentence equal to the sentence established for a severity level 1 crime pursuant to the sentencing guidelines grid for nondrug crimes (up to 653 months), whichever is greater, and such mandatory**

**minimum term of imprisonment shall not be reduced by the application of good time credits; and a fine up to \$500,000.00.**

## **COUNT TWO**

### **MISTREATMENT OF AN ELDER PERSON**

**K.S.A. 21-5417(a)(1) & (b)(1)**

**Level 5, Person Felony**

That on or about the 24th day of February, 2020, in McPherson County, Kansas, Tina Nicole Brown did then and there, unlawfully, feloniously, and knowingly, inflict physical injury upon an elder person, to wit: Kelly G. Peterson, an elder person as defined in K.S.A. 21-5417(e)(3), contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

**Penalty Sections: K.S.A. 21-6804, K.S.A. 21-6611, & K.S.A. 22-3717**

**Penalty Range: 31-136 months imprisonment in the custody of the Secretary of Corrections; a fine up to \$300,000.00; and 24 months post-release supervision.**

## **COUNT THREE**

### **BATTERY AGAINST A LAW ENFORCEMENT OFFICER**

**K.S.A. 21-5413(a)(2), (c)(1)(B), & (g)(3)(A)**

**Class A, Person Misdemeanor**

That on or about the 24th day of February, 2020, in McPherson County, Kansas, Tina Nicole Brown did then and there, unlawfully and knowingly, cause physical contact with a uniformed or properly identified city law enforcement officer, to wit: McPherson Police Chief Mikel Golden, while Chief Golden was engaged in the performance of his duty, in a rude, insulting, or angry manner, contrary to the form of the statutes in such case made and provided against the peace and dignity of the State of Kansas.

**Penalty Sections: K.S.A. 21-6602(a)(1), K.S.A. 21-6611(b)(1)**

**Penalty Range: Up to one year confinement in the county jail and a fine up to \$2,500.00.**



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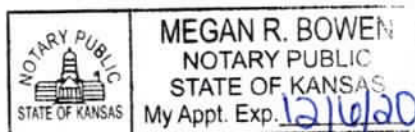
STATE OF KANSAS, McPHERSON COUNTY, SS:

I, Paul E. Brothers, being first duly sworn, state that I have read the above and foregoing Complaint/Information and know the contents thereof, and that the same is true in substance and in fact to my best information and belief:



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SUBSCRIBED AND SWORN to before me this 26 day of February, 2020.

  
Notary Public

Assigned Prosecutors:

Steven A. Karrer

Paul E. Brothers

STATE'S WITNESSES:

Marvin Franklin – Special Agent, Kansas Bureau of Investigation

Ryan Boyer – Special Agent, Kansas Bureau of Investigation

Steve Rosebrough – Assistant Special Agent in Charge, Kansas Bureau of Investigation

Jeremy Newman – Senior Special Agent, Kansas Bureau of Investigation

Amber Cole – Special Agent, Kansas Bureau of Investigation

Jacob Leakey – Special Agent, Kansas Bureau of Investigation

Cory Letham – Kansas Bureau of Investigation

Eric Moore – Kansas Bureau of Investigation

Traci Allen – Kansas Bureau of Investigation

Jamie Funk – Kansas Bureau of Investigation

Shane Webb – Kansas Bureau of Investigation

Kayla Horst – Kansas Bureau of Investigation

Brian Carroll – Kansas Bureau of Investigation

Cory Stephens – Kansas Bureau of Investigation

Kayla Nida – Kansas Bureau of Investigation

Chris Engle-Tjaden – Kansas Bureau of Investigation

Grant Mausolf – Kansas Bureau of Investigation

Mikel Golden – Chief of Police, McPherson, Kansas Police Department

Leslie Caballero – McPherson Kansas, Police Department

Brady Winkler – McPherson Kansas, Police Department

David Reed – McPherson Kansas, Police Department

Philip Burkhart – McPherson Kansas, Police Department

Shannon Quinn – McPherson Kansas, Police Department

Jessica Dirks – McPherson Kansas, Police Department

Collin Reissig – McPherson Kansas, Police Department

Ayeshah Munden – McPherson Kansas, Police Department

Trea Lott – McPherson Kansas, Police Department

Patrick C. Carr – McPherson Kansas, Police Department

Joshua Prindle – McPherson Kansas, Police Department

Kyle Askren – McPherson Kansas, Police Department

Jake Pearson – McPherson Kansas, Police Department

Scott Brunsell – McPherson Kansas, Police Department

Jason Moen – McPherson Kansas, Police Department

Matthew van der Hoeven – McPherson Kansas, Police Department

Katie Conn – McPherson Kansas, Police Department

William Burgess – McPherson Kansas, Police Department

Kevin Mckean – McPherson Kansas, Police Department

Anthony Jones – McPherson Kansas, Police Department

Jon Yates – McPherson Kansas, Police Department

James Halbmaier – McPherson Kansas, Police Department

William Cummins – McPherson Kansas, Police Department

Tim Schrock

Ronnie Huff

Lisa Huff

Doug Strawn

Ilsa Bless

Kevin Otte

Kimberly Miller

David Wegele

Ronald Fielder

Chad Phillips

Sarah Tucker

Kory Philips

Rhonda Brown

Rocky Phillips

Antonino Martinez

Charles Shelton

Shelia Schmidt

Cristina L. Koch

Records Custodian – People's Bank

Records Custodian – Mead's Liquor