

Jessica G. Domme, #23221  
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**IN THE TWENTY-THIRD JUDICIAL DISTRICT  
DISTRICT COURT OF ROOKS COUNTY, KANSAS**

STATE OF KANSAS,  
Plaintiff,

v.

THOMAS S. WOJTCZUK,  
Defendant.

Case No. 20-CR-\_\_\_\_\_

**COMPLAINT / INFORMATION**

**COMES NOW** the State of Kansas, by and through Derek Schmidt, Attorney General, and Jessica G. Domme, Assistant Attorney General, for its Complaint/Information against the Defendant above-named, alleges and states:

**COUNT 1**

**MURDER IN THE SECOND DEGREE - INTENTIONAL  
Severity Level 1 Person Felony**

That on or about the 8th day of April, 2020, in Rooks County, and State of Kansas, **THOMAS S. WOJTCZUK** did, then and there, unlawfully, feloniously, and intentionally kill a human being, to-wit: Charity Northrop, contrary to and in violation of K.S.A. 2019 Supp. 21-5403(a)(1), and amendments thereto; penalty section: K.S.A. 2019 Supp. 21-5403(b)(1), and amendments thereto.

**Domestic Violence Designation:** There is evidence this offense is a domestic violence offense as provided in K.S.A. 22-4616(a) and K.S.A. 21-5111, and may be subject to the requirements of K.S.A 21-6604(p).

**COUNT 2**

**CRIMINAL POSSESSION OF A FIREARM BY CONVICTED FELON  
Level 8 Nonperson Felony**

That on or about the 8th day of April, 2020, in Rooks County, and State of Kansas, **THOMAS S. WOJTCZUK** did, unlawfully and knowingly possess a firearm, to-wit: a shotgun, and within the proceeding five (5) years has been released from imprisonment for a felony, to-wit: aggravated criminal sexual abuse, Madison Co. Circuit Court Case No. 13-CF-2217, and was not found to have been in possession of a firearm at the time of the prior crime, in violation of K.S.A. 2019 Supp. 21-6304(a)(2), and amendments thereto; penalty section: K.S.A. 2019 Supp. 21-6304(b), and amendments thereto.

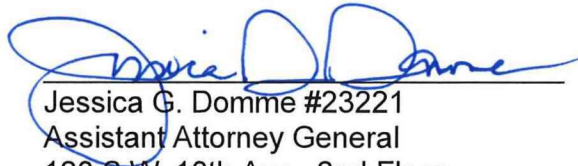
All of the said acts then and there committed being contrary to the statutes in such cases made and provided and being against the peace and dignity of the State of Kansas.

Respectfully submitted,

OFFICE OF THE ATTORNEY GENERAL



Derek Schmidt #17781  
Attorney General  
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### STATE'S WITNESSES

M.B. YOB 2007	Jadiah States
L.B. YOB 2008	Lauren Tucker
B.B. YOB 2009	John Voss
Cory Carlston	Jaelynn Wayman
Julie Cole	Deputy Jessie Goodenow, ROSO
Derry Dibble	Rooks Co. EMS Personnel
Leona Drullinger	Rooks Co. Dispatch Personnel
Dakota Drullinger	SAC Cory Latham, KBI
Donald Earl	ASAC Joby Harrison, KBI
Elayna Frank	SA Andrew Powers, KBI
Angela Hahn	SSA Tim Beckham, KBI
Nathaniel Herbel	SA Dustin Snodgrass, KBI
Kevin Kuhn	SA Charles Bitler, KBI
Ben Larson	SA Andrew Thayer, KBI
Dylan Lynch	SSA Shane Webb, KBI
Bradley Lynch	SSA Tracie Allen, KBI
Rick Newman	TSA Jamie Funk, KBI
Ray Niblock	TSA Chris Engle-Tjaden, KBI
Andrew Saaronen	SA Cort DePeugh, KBI Saaronen
B.S. YOB 2003	TSA Cory Stephens, KBI
Heather Shamburg	Lyle J. Noordhoek, M.D.
Ian Snyder	

**STATE OF KANSAS, COUNTY OF SHAWNEE, SS:**

I, Jessica G. Domme, 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:



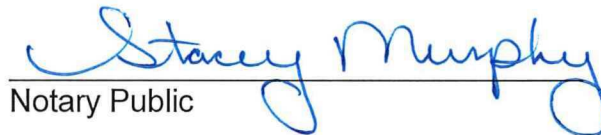
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SUBSCRIBED AND SWORN to before me this 17<sup>th</sup> day of April, 2020.



**Stacey Murphy**  
Notary Public  
State of Kansas

My Appt. Expires May 1, 2022



Notary Public