



5676

COMPLAINT

(General Form)

17998
X

In the Magistrate Court of Johnson County, Kansas

STATE OF KANSAS, }
Johnson County, }

ss.

James W. Bouska

~~Assistant~~ County Attorney,

being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of ~~Johnson~~ Wyandotte, and State of Kansas,

Henry Floyd Brown, Andrew Evan Gipson, Bonnie S. Wilane and Karen Lynne Goetz, also known as Karen Lynne Brandon, did then and there unlawfully, willfully and feloniously steal, take and carry away the personal property of another, to-wit: a 1959 white Chevrolet two-door Impala automobile, bearing Missouri registration plate numbered XK8-621, owned by the estate of Josephine Mahar, deceased, and in the custody of John Archer, and being of the value of more than \$50, to-wit: approximately \$150; and thereafter, on or about the 19th day of January, 1968, said Henry Floyd Brown, Andrew Evan Gipson, Bonnie S. Wilane and Karen Lynne Goetz, also known as Karen Lynne Brandon, did then and there bring said personal property so taken by larceny in Wyandotte County, Kansas into Johnson County, Kansas; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

COUNT II James W. Bouska, County Attorney, being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of Johnson and State of Kansas, Henry Floyd Brown, Andrew Evan Gipson, Bonnie S. Wilane and Karen Lynne Goetz, also known as Karen Lynne Brandon, did then and there unlawfully, feloniously, willfully and maliciously injure the property of another, to-wit: public property belonging to the City of Overland Park, Kansas, consisting of damage done to a brick wall and an airconditioning unit located at the northwest corner of the City Hall, by causing dynamite to explode at said location, the value of said property and the amount of damage done thereto being more than \$50, the approximate amount of damage done thereto being \$3,000; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

COUNT III James W. Bouska, County Attorney, being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of Johnson and State of Kansas, Henry Floyd Brown, Andrew Evan Gipson, Bonnie S. Wilane and Karen Lynne Goetz, also known as Karen Lynne Brandon, did then and there unlawfully, willfully and feloniously enter the premises of Metcalf State Bank, Overland Park, Kansas, with intent to rob said bank of money belonging to said bank; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

~~Contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.~~

FILED

FEB 16 1968

Edna Ferguson

CLERK OF MAGISTRATE COURT
JOHNSON COUNTY, KANSAS

~~Subscribed and sworn to before me this~~

~~day~~

~~at~~

COUNT IV James W. Bouska, County Attorney, being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of Johnson and State of Kansas, Henry Floyd Brown, Andrew Evan Gipson, Bonnie S. Wilane and Karen Lynne Goetz, also known as Karen Lynne Brandon, did then and there unlawfully, willfully and feloniously, on purpose and of malice aforethought, shoot at another, to-wit: Chester Sundbye, a police officer, with a rifle, with intent to kill the said Chester Sundbye; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

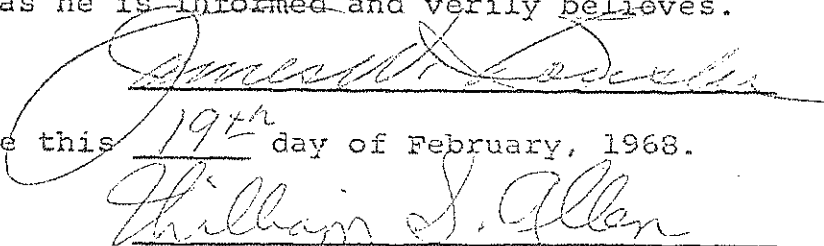
COUNT V James W. Bouska, County Attorney, being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of Johnson and State of Kansas, Henry Floyd Brown, Andrew Evan Gipson, Bonnie S. Wilane and Karen Lynne Goetz, also known as Karen Lynne Brandon, did then and there unlawfully, willfully and feloniously take the property of another, a 1966 Chevrolet convertible automobile, blue in color, with a white canvas top, bearing 1967 Kansas registration plate numbered JO 14508, owned by Howard L. Upton and Erma D. Upton, in the presence of Erma D. Upton and against her will, by putting her in fear of some immediate injury to her person, by threatening her and showing her a firearm, which was pointed at the said Erma D. Upton; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

COUNT VI James W. Bouska, County Attorney, being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of Johnson and State of Kansas, Henry Floyd Brown, Andrew Evan Gipson, Bonnie S. Wilane and Karen Lynne Goetz, also known as Karen Lynne Brandon, did then and there unlawfully, willfully, feloniously, maliciously, deliberately, premeditatedly, on purpose and with malice aforethought, kill Eldon Miller, a police officer, by shooting the said Eldon Miller in the head with a firearm; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

COUNT VII James W. Bouska, County Attorney, being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of Johnson and State of Kansas, Henry Floyd Brown did then and there unlawfully, willfully and feloniously have a pistol in his possession, having been previously convicted of felonious assault and robbery and assault with intent to kill, in Clackamas County, Oregon in 1945; and kidnapping, in United States District Court, in Waterloo, Iowa, in 1952; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

COUNT VIII James W. Bouska, County Attorney, being duly sworn, on oath says, that on or about the 19th day of January, 1968, in the County of Johnson and State of Kansas, Andrew Evan Gipson did then and there unlawfully, willfully and feloniously have a pistol in his possession, having previously been convicted of burglary in Greene County, Missouri in 1954; burglary and grand larceny in Jasper County, Missouri in 1956; and robbery in United States District Court in Kansas City, Kansas, in 1963; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas, as he is informed and verily believes.

Subscribed and sworn to before me this 19th day of February, 1968.


Judge of the Magistrate Court