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CLERK OF THE SHAWNEE COUNTY DISTRICT COURT  
CASE NUMBER: 2020-CR-001356

SNSO 2019-00036159

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

**STATE OF KANSAS,  
Plaintiff,**

**vs.**

**Case No.  
DA No. 20-2019  
Division No. \_\_\_\_\_**

**STEVEN CHARLES WATKINS JR.,  
Defendant.**

**COMPLAINT/INFORMATION**

COMES NOW, Kevin S Keatley, a duly appointed, qualified and acting Assistant 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

**INTERFERENCE WITH LAW ENFORCEMENT, FALSE INFORMATION  
K.S.A. 21-5904(a)(1)(C),(b)(2)(B)  
Level 9, Non Person Felony**

On or about the 10th of February, 2020 in the State of Kansas and County of Shawnee, STEVEN CHARLES WATKINS JR., did, then and there, unlawfully, feloniously, and falsely report to a law enforcement officer, law enforcement agency, or state investigative agency, to-wit: Detective Stephanie Dicken of the Shawnee County Sheriff's Office, any information, knowing that such information is false and intending to influence, impede or obstruct such officer's or agency's duty, in the case of a felony, 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**

**VOTING WITHOUT BEING QUALIFIED  
K.S.A. 25-2416(a)(1)  
Level 7, Non Person Felony**

On or about the 4th of November, 2019 in the State of Kansas and County of Shawnee, STEVEN CHARLES WATKINS JR., did, then and there, unlawfully, feloniously, and knowingly, vote without being qualified in any election district, to-wit: District 8 Topeka City Council election, when not a lawfully registered voter in such election district, 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**

**UNLAWFUL ADVANCE VOTING  
K.S.A. 25-1128(f)  
Level 9, Non Person Felony**

On or about the 28th of October, 2019 in the State of Kansas and County of Shawnee, STEVEN CHARLES WATKINS JR., did, then and there, unlawfully, feloniously, knowingly, and falsely affirmed, declared, or subscribed to a material fact in an affirmation form for an advance voting ballot, 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 4**

**NO CHANGE OF ADDRESS ON DRIVERS LICENSE  
K.S.A. 8-248**

On or about the 11th of July, 2019 in the State of Kansas and County of Shawnee, STEVEN CHARLES WATKINS JR., did, then and there, unlawfully, fail to notify the Motor Vehicle Department within ten days in writing of change of address, 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:

Kansas Department Motor Vehicle  
Becky Black  
KBI Lab Personnel  
Andrew N Howell  
Janette Gully  
Detective Ryan Myers, SNSO#0463  
Lt. Matt Biltoft, DOC, SNCO#26  
Shawnee County Dispatch Personnel  
Topeka Fire Personnel  
Amber Frakes  
Overlook Apartments Records Custodian

Custodian Of Records, Kansas Department  
of Revenue  
UPS Personnel  
Spencer Duncan  
Adam Linhos  
Special Agent Chad Burr  
Timberland Partners Records Custodian  
Melanie Mills-Bergers, SNSO#  
Det. Stephanie Dicken, SNSO#787  
AMR Personnel  
Nicholas Hill

Kevin S Keatley, Assistant 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  
Assistant District Attorney  
200 SE 7<sup>th</sup> 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 14th day of July, 2020.

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

**BOND REQUEST §**

With Prof. Surety/Cash

OR

As Set

Summons to Issue in Lieu of Warrant

No Contact With Victim

No Contact With Co-Defendants/CoRespondants

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