

IN THE DISTRICT COURT OF JOHNSON COUNTY, KANSAS

STATE OF KANSAS,

Plaintiff,

VS.

COMPLAINT

No.
D.V.

WILLIE EARL GAY, JR.,

Defendant.

STATE OF KANSAS, JOHNSON COUNTY, ss:

I, Michael F. McElhinney, Assistant District Attorney of said County, upon information and belief, state under oath to the court that

WILLIE EARL GAY, JR.

did the following:

COUNT I – That on or about the 19th day of January, 2022, in the County of Johnson, State of Kansas, WILLIE EARL GAY, JR. did then and there unlawfully and knowingly, by means other than fire or explosive, damage property, to-wit: vacuum cleaner, wall, door frame, to the extent of less than \$1,000.00, in which another person had an interest, to-wit: [REDACTED] without the consent of such person, a class B non-person misdemeanor, which constitutes a domestic violence offense, in violation of K.S.A. 21-5813, K.S.A. 21-6602 and K.S.A. 22-4616 (criminal damage to property)

I declare under penalty of perjury that the foregoing is true and correct.

Executed by and on this date.

/s/ MICHAEL MCELHINNEY
Dated: 01/20/22

Michael F. McElhinney/dmh #15506
Assistant District Attorney
150 W. Santa Fe
Olathe, Kansas 66061
(913)715-3000

WITNESSES:

[REDACTED]
Off. D. Herring
Off. Ledgerwood

IN THE DISTRICT COURT OF JOHNSON COUNTY, KANSAS
Criminal Department

State of Kansas

Vs.

WILLIE EARL GAY, JR, Defendant

INITIATION OF ACTION

Offense(s) Alleged:

21-5813 (c) (3)

CRIM DAMAGE <\$1000

X The Court finds from the complaint and affidavit that there is probable cause to believe both that a crime has been committed in Johnson County, Kansas and that the defendant committed the same.

/s/ DANIEL VOKINS, MAGISTRATE JUDGE

01/20/22

Judge of the District Court