

STATE OF SOUTH DAKOTA

IN CIRCUIT COURT

COUNTY OF BROWN

SOUTH DAKOTA  
57700

FIFTH JUDICIAL CIRCUIT

FILED  
NOV 1 2022

STATE OF SOUTH DAKOTA

**COMPLAINT FOR:**

Plaintiff,  
vs.

Count 1  
AGGRAVATED KIDNAPPING, FIRST  
DEGREE in violation of SDCL 22-19-1(2)

JOSHUA KENNETH ORTLEY  
S LINCOLN ST  
ABERDEEN, SD 57401

Count 2  
AGGRAVATED ASSAULT in violation of  
SDCL 22-18-1.1(1)

DOB: [REDACTED]  
Defendant.

The undersigned being duly sworn upon oath charges:

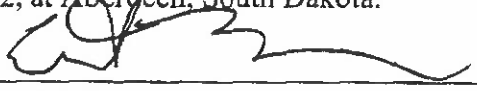
**COUNT 1**

That on or about the 24th day of October, 2022, in the County of Brown, State of South Dakota, JOSHUA KENNETH ORTLEY, did commit the public offense of AGGRAVATED KIDNAPPING, FIRST DEGREE, in that he did either unlawfully remove another person from their place of residence or employment, or unlawfully remove another person a substantial distance from the vicinity where the other was at the commencement of the removal, or unlawfully confine another person for a substantial period of time, to facilitate the commission of any felony or flight thereafter, and did inflict serious bodily injury on the victim, to-wit: Joshua Kenneth Ortley did either unlawfully remove another person from their place of residence or employment, or unlawfully remove another person a substantial distance from the vicinity where the other was at the commencement of the removal, or unlawfully confine Simon Daudi Deng for a substantial period of time, to facilitate the commission of Aggravated Assault, SDCL 22-18-1.1(1), and Class 3 Felony or flight thereafter, and did inflict serious bodily injury on Simon Daudi Deng, in violation of SDCL 22-19-1(2), (Cl. B felony);

**COUNT 2**

That on or about the 24th day of October, 2022, in the County of Brown, State of South Dakota, JOSHUA KENNETH ORTLEY, did commit the public offense of AGGRAVATED ASSAULT, in that he did attempt to cause serious bodily injury to another, or caused such injury, under circumstances manifesting extreme indifference to the value of human life, to-wit: Joshua Kenneth Ortley did attempt to cause serious bodily injury to Simon Daudi Deng, or caused such injury, under circumstances manifesting extreme indifference to the value of human life, in violation of SDCL 22-18-1.1(1), (Cl. 3 felony);

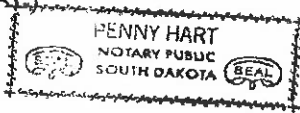
Dated this 16th day of November, 2022, at Aberdeen, South Dakota.

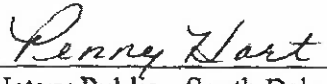


Complainant

Dated this 16<sup>th</sup> day of November, 2022 at Aberdeen, South Dakota.

(SEAL)





Notary Public - South Dakota

My commission expires: 8-27-27

### REQUEST FOR ARREST WARRANT

The undersigned, as prosecuting attorney, hereby requests an Arrest Warrant to be issued based upon the above Complaint.

YES