

IN THE DISTRICT COURT OF OSAGE COUNTY, KANSAS
FOURTH JUDICIAL DISTRICT

FILED

2013 OCT 17 AM 8:15

CLERK OF THE DIST. COURT
OSAGE COUNTY, KANSAS
CLERK OF COURT USE ONLY

STATE OF KANSAS,

Plaintiff,

vs.

Case No. 2013-CR- 183

JAMES P. HARRIS,
Federal Prison
Texarkana, TX

Defendant.

COMPLAINT

I, Brandon L. Jones, Osage County Attorney, and Chadwick J. Taylor, Shawnee County District Attorney, both of lawful age, being first duly sworn on oath, for complaint against the above named defendant, alleges and states:

COUNT 1 - MURDER IN THE 1ST DEGREE

That on or about the 3rd day of March, 2011, through the 20th day of April, 2011, in Osage County, Kansas, JAMES P. HARRIS did unlawfully, feloniously, intentionally and with premeditation, kill a human being, to-wit: James E. Gerety, an off-grid person felony, in violation of K.S.A. 21-5402(a)(1) & (b).

Penalty: Imprisonment for life with a mandatory minimum term of imprisonment of not less than 25 years and/or a fine of up to \$500,000.00, pursuant to K.S.A. 21-6804, 21-6806, 21-6807 & 21-6611.



Brandon L. Jones, #19858
Osage County Attorney
Osage County Attorney's Office
717 Topeka Avenue - P.O. Box 254
Lyndon, Kansas 66451
(785) 828-4931
(785) 828-3150 (fax)
bjones@osageca.org



Chadwick J. Taylor, #19591
Special Prosecutor
Shawnee County District Attorney
200 SE 7th St.
Topeka, Kansas 66603
(785) 233-8200
(785) 291-4909 (fax)
chad.taylor@snco.us

SUBSCRIBED AND SWORN before me this 16th day of October, 2013.



Debbie Long
Notary Public

WITNESSES:

Detective Heather Stults-Lindsay
Detective George Henley
Detective Dickey
Detective Brian Hill
Detective Kasl
Detective Ludolph
Officer Danielson
Officer Dunderdale
Officer Sixkiller
Jackson County Detective Cavanaugh
Osage County Deputy Jacob Henry
James E. Gerety
Michelle Bellucci
Regina Clark
James Cox
David Gonzales

Brian J Harris
Jeffrey J. Harris
Thomas Henderson
Raymond Hendricks
Shirley Johnson
Laura Marshall
Mouse Medicine-Horse
Stephen Mumford
Cole A Mundy
Barbara Roberts
Samantha Schwalie
Noreen Vega
Clinton Ward
Bobbie Williams
Julie Wyant

TPD Case # 8278-11