

IN THE DISTRICT COURT OF OSAGE COUNTY, KANSAS
FOURTH JUDICIAL DISTRICT
(CRIMINAL DIVISION)

FILED

2009 NOV 30 AM 10:41

CLERK OF THE DIST. COURT
OSAGE COUNTY KANSAS

STATE OF KANSAS,

Plaintiff,

v.

JAMES KRAIG KAHLER,
YOB: 1963

Defendant.

Case No. 09CR270

COMPLAINT - INFORMATION

Amy Hanley, Assistant Attorney General, being first duly sworn on oath, states and alleges that **JAMES KRAIG KAHLER** committed the following crimes:

COUNT ONE

In the County of Osage and State of Kansas, and on or about November 28, 2009, **JAMES KRAIG KAHLER**, did then and there unlawfully, feloniously, intentionally and with premeditation, kill Karen L. Kahler, did then and there unlawfully, feloniously, intentionally and with premeditation, kill Emily C. Kahler, and did then and there unlawfully, feloniously, intentionally and with premeditation, kill Lauren E. Kahler, as part of the same act or transaction or in two or more acts or transactions connected together or constituting parts of a common scheme or course of conduct.

(Contrary to K.S.A. 21-3439(a)(6), Capital Murder, an off-grid person felony)

(Punishable by a sentence of death, K.S.A. 21-4624)

OR IN THE ALTERNATIVE TO COUNT ONE

COUNT TWO

In the County of Osage and State of Kansas, and on or about November 28, 2009, **JAMES KRAIG KAHLER**, did then and there unlawfully, feloniously, intentionally and with premeditation, kill a human being, to-wit: Karen L. Kahler.

(Contrary to K.S.A. 21-3401(a), First Degree Murder, an off-grid person felony)

(Penalty - K.S.A. 21-4635, 21-4636 & 21-4637)

ALSO IN THE ALTERNATIVE TO COUNT ONE

COUNT THREE

In the County of Osage and State of Kansas, and on or about November 28, 2009, **JAMES KRAIG KAHLER**, did then and there unlawfully, feloniously, intentionally and with premeditation, kill a human being, to-wit: Emily C. Kahler.

(Contrary to K.S.A. 21-3401(a), First Degree Murder, an off-grid person felony)

(Penalty - K.S.A. 21-4635, 21-4636 & 21-4637)

ALSO IN THE ALTERNATIVE TO COUNT ONE

COUNT FOUR

In the County of Osage and State of Kansas, and on or about November 28, 2009, **JAMES KRAIG KAHLER**, did then and there unlawfully, feloniously, intentionally and with premeditation, kill a human being, to-wit: Lauren E. Kahler.

(Contrary to K.S.A. 21-3401(a), First Degree Murder, an off-grid person felony)

(Penalty – K.S.A. 21-4635, 21-4636 & 21-4637)

COUNT FIVE

In the County of Osage and State of Kansas, and on or about November 28, 2009, **JAMES KRAIG KAHLER**, did then and there unlawfully, willfully, feloniously and intentionally commit an overt act, to-wit: shot Dorothy Wight, toward the perpetration of the crime of First Degree Murder, with the intent to commit such crime, but failed in the perpetration thereof or was prevented or intercepted in executing such crime. First Degree Murder is defined in K.S.A. 21-3402(1) and is unlawfully, feloniously, intentionally, and with premeditation killing a human being.

(Contrary to K.S.A. 21-3301 and 21-3402(a), Attempted First Degree Murder, a severity level 1 person felony)

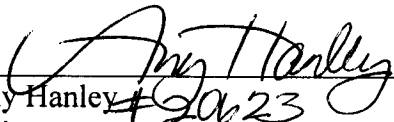
(Punishable by a sentence of 147 - 653 months confinement in the Kansas Department of Corrections)

COUNT SIX

In the County of Osage and State of Kansas, and on or about November 28, 2009, **JAMES KRAIG KAHLER** did then and there unlawfully, feloniously, willfully, knowingly, intentionally and without authority enter into or remain within a structure, to-wit: a dwelling located at 905 S. Topeka Avenue, Burlingame, Kansas, Osage County, Kansas, in which there were human beings, to-wit: Karen L. Kahler, Emily C. Kahler, Lauren E. Kahler, Sean Kahler, and Dorothy E. Wight, with the intent to commit a felony, to-wit: Capital Murder, contrary to K.S.A. 21-3439(a)(6).

(Contrary to K.S.A. 21-3716, Aggravated Burglary, a severity level 5 person felony)

(Punishable by a sentence of 31 - 136 months confinement in the Kansas Department of Corrections)



Amy Hanley #20623
Assistant Attorney General

Subscribed and sworn to before me this 30th day of November, 2009.



DISTRICT JUDGE

WITNESSES:

Bill Halvorsen, KBI
Bob Beckham, KBI
Doug Jorgensen, KBI
Dave Hutchings, KBI
Mike Van Stratton, KBI
Toni Weingartner, KBI
Rick Sabel, KBI
Mark Malick, KBI
David Brede, KBI
Sherri Moore, KBI
Katie Schuetz, KBI
Ryan Boyer, KBI
John Kite, KBI
Angie Wilson, KBI
Rod Page, KBI
Sheriff Lori Dunn, Osage SO
Nathan Perling, Osage SO
Chris Wecker, Osage SO
Ted Craig, Osage SO
Dwayne Peoples, Osage SO
Paul Strother, Jr., Osage SO
Clayton Ellis, Osage SO
John Knapp, Osage SO

Scott Farmer, Osage SO
Sam Ralston, Osage SO
Jacob Henry, Osage SO
Shane Kirkpatrick, Osage SO
Cameron Murray, Osage SO
Ted Clark, Osage SO
Brett Cox, Scranton PD
Jeff Bunker, Osage City PD
Larry Phillips, Osage City PD
Anthony Richmond, Burlingame PD
Ryan Dudley, Burlingame PD
Reanne Phanenstiel, Shawnee SO
Ron Hess, KHP
Trooper Phillips, KHP
Dorothy Wight
Sean Kahler
Chris Kahler
Wayne Kahler
Patricia Kahler
Michelle Davidson
Sunny Reese
Dr. Erik Mitchell