ELECTRONICALLY FILED
2019 Oct 31 PM 1:30
CLERK OF THE HARVEY COUNTY DISTRICT COURT
CASE NUMBER: 2019-CR-000743

DISTRICT COURT OF HARVEY COUNTY, KANSAS

In the Ninth Judicial District

2nd Floor, Harvey County Courthouse, Newton, Kansas

COMPLAINT

THE STATE OF KANSAS, Plaintiff

vs. **CASE NO:** 19CR743

TED MUELLER, Defendant
[redacted] North Newton, KS 67117
DOB: 1934; White Non-Hispanic male;
510; 170 pounds;
Driver's License Number: XXXXX3153;
Social Security Number: XXX-XX-3119

2019 OCT 31 AM 10:05

COMPLAINT

COMES NOW David E Yoder, a duly appointed, qualified and acting Harvey County Attorney of Harvey County, Kansas, and of the 9th Judicial District of the State of Kansas, and for and on behalf of said State gives the court to understand and be informed:

COUNT ONE

That on or about the 2nd day of August, 2018 in Harvey County, Kansas, Ted Mueller, then and there being present did unlawfully and without consent touch [redacted] who was 16 or more years of age and not the spouse of the defendant, with the intent to arouse or satisfy the sexual desires of the defendant or another. In violation of K.S.A. 2013 Supp. 21-5505(a), Sexual Battery, a class A person misdemeanor. (Maximum penalty: one year in county jail and a fine of up to $2500)

COUNT TWO

That on or about the 2nd day of August, 2018, in Harvey County, Kansas, Ted Mueller, then and there being present did unlawfully and without consent touch [redacted] who was 16 or more years of age and not the spouse of the defendant, with the intent to arouse or satisfy the sexual desires of the defendant or another. In violation of K.S.A. 2013 Supp. 21-5505(a), Sexual Battery, a class A person misdemeanor. (Maximum penalty: one year in county jail and a fine of up to $2500)

COUNT THREE

That on or about the 2nd day of August, 2018, in Harvey County, Kansas, one Ted Mueller, then and there being present did unlawfully, publicly expose a sex organ, in the presence of a person who is not the spouse of the defendant and who has not consented thereto, with the intent to arouse or gratify the sexual desires of the defendant or another. In violation of K.S.A. 2013 Supp. 21-5513(a)(2), Lewd and Lascivious Behavior, a class B nonperson misdemeanor. (Maximum penalty: six months in county jail and a fine of up to $1000)

all of the said acts then and there committed being contrary to the statutes in such cases made and provided and against the peace and dignity of the State of Kansas.

DAVID E YODER, SC# 11366
Harvey County Attorney

STATE OF KANSAS, HARVEY COUNTY, ss:

JIM BETHARDS, being first duly sworn, states that I have read the above and foregoing Complaint and know the contents thereof, and that the same is true in substance and in fact.

COMPLAINING WITNESS

SUBSCRIBED AND SWORN to before me on this 31st day of October, 2019.

~~NOTARY PUBLIC~~ District Court Judge

STATE WITNESSES:
Jim Bethards #802
Randy Jordan #801
Josh Lowe #803