

TPD 2025-00022577

**IN THE KANSAS DISTRICT COURT
THIRD JUDICIAL DISTRICT, SHAWNEE COUNTY, KANSAS
CRIMINAL LAW DIVISION**

**STATE OF KANSAS,
Plaintiff,**

vs.

**Case No.
DA No. 25-3330
Division No. _____ M1**

**DANIEL GENE RAMSEY,
Defendant.**

COMPLAINT/INFORMATION

COMES NOW, Keith C Henderson, a duly appointed, qualified and acting Deputy District Attorney of the Third Judicial District of the State of Kansas, and for and on behalf of said State gives the court to understand and be informed that:

COUNT 1

**SEXUAL BATTERY
K.S.A. 21-5505(a)
Class A Person Misdemeanor**

On or about the 26th day of March, 2025 in the State of Kansas and County of Shawnee, Daniel Gene Ramsey, did, then and there, unlawfully touch the person of a victim, who was 16 or more years of age, to-wit: M.P. xx/xx/72, and who did not consent to the touching, with the intent to arouse or satisfy the sexual desires of the offender or another, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

Witnesses

The State of Kansas endorses the following witnesses whom the State may call to appear and testify:

Alexandrea Ann Patterson
AMR Personnel
Community Corrections Probation, #
Connie Deyl Humes
Court Services Probation, #
Deputy Darrin Marr, #879
Heather Jones
Jared D Strathman, #51
KBI Lab Personnel
Lacey Black
Lisa Blankenship
Lucas D Cummings, #12
Melanie Roberts, #
M.P. (XX/XX/72)
Sarah B Friedrichs, #141
Shawnee County Dispatch Personnel
Topeka Fire Personnel

Keith C Henderson, Deputy District Attorney for the Third Judicial District of Kansas, within and for said State being first duly sworn states that I have read the above and foregoing Complaint/Information and know the content thereof, and that the same is true in substance and in fact to my best information and belief.

By: / Keith C Henderson/
Keith C Henderson,#22080
Deputy District Attorney
200 SE 7th Street, Suite 214
Topeka, KS 66603
(785) 251- 4330
(785) 251-4909 (FAX)

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

Executed on this 25 day of June, 2025.

By: / Keith C Henderson/
Keith C Henderson,#22080
Deputy District Attorney

BOND REQUEST \$ 2500

With Prof. Surety/Cash

OR

As Set

Summons to Issue in Lieu of Warrant

No Contact With Victim

No Contact With Co-Defendants/Co-Respondents

No Contact With Witnesses

No Weapons

Bond supervision

GPS Monitor

All Conditions as previously ordered on the bond set form

No Possession or consumption of any alcohol/cereal malt beverages or illegal drugs

Do not operate motor vehicle without a valid license and insurance

Remain law abiding

Will extradite

Will not extradite

Will extradite from border-states only

Accelerated Diversion Docket Setting Needed

Docket Date:

Note: The diversion policy of the Shawnee County District Attorney can be found at <http://www.snco.us/da/>