

IN THE 3RD JUDICIAL DISTRICT OF THE STATE OF KANSAS
IN THE DISTRICT COURT OF SHAWNEE COUNTY

FILED BY CLERK
KANSAS DISTRICT COURT
THIRD JUDICIAL DIST.
TOPEKA, KS.

STATE OF KANSAS,
Plaintiff,

vs.

Case No. 17CR53

2017 JAN 19 P 2:43

PRESTON G. CHRISTENSEN,
Defendant.

COMPLAINT/INFORMATION

COMES NOW, Eric K. Rucker, the duly appointed and qualified Assistant Secretary of State for the State of Kansas, on behalf of Secretary of State Kris W. Kobach and on behalf of the State of Kansas, and gives the court to understand and be informed that Mr. Bryan Caskey, the duly appointed Deputy Assistant Secretary of State, has submitted a sworn affidavit that probable cause exists to believe that crime/s have been committed and further states and declares as follows:

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1/19/17

COUNT ONE

On a date between October 19, 2012 and November 6, 2012, in Shawnee County, Kansas, the defendant, Preston G. Christensen, did knowingly and willfully vote more than once at the same election, *to wit*: "General election," as defined in K.S.A. 25-2502(a) and K.S.A. 25-1115(a), and "National election" as defined in K.S.A. 25-2503(a) and K.S.A. 25-1116(a), in violation of K.S.A. 25-2416(b) **VOTING WITHOUT BEING QUALIFIED**, a Class A nonperson misdemeanor.

COUNT TWO

On a date between October 19, 2012 and November 6, 2012, in Shawnee County, Kansas, the defendant, Preston G. Christensen, did knowingly and willfully vote at the 2012 General election, as defined in K.S.A. 25-1115, when not a lawfully registered voter, in violation of K.S.A. 25-2416(a) **VOTING WITHOUT BEING QUALIFIED**, a Class A nonperson misdemeanor.

COUNT THREE

On or about October 19, 2012, in Shawnee County, Kansas, the defendant, Preston G. Christensen, did willfully and falsely declare or subscribe to a material fact in an affirmation for an advance voting ballot, in violation of K.S.A. 25-1128(f), **ADVANCE VOTING UNLAWFUL ACTS**, a Class C nonperson misdemeanor.

WITNESSES

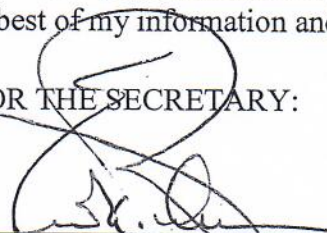
Presently Known Witnesses:

The State of Kansas endorses the following witnesses, presently known to the State, who may be called to appear and testify in this matter:

Mr. Bryan Caskey, Director of Elections, Kansas Secretary of State
Mr. Jameson Beckner, Assistant Director of Elections, Kansas Secretary of State
Mr. Dennis McPhail, Kansas Bureau of Investigation
Dallas County, TX Elections Office Representative
Texas Secretary of State's Office Representative
Craig McCullah, Investigator, Kansas Secretary of State
Sgt. Boone Caldwell, Office of Attorney General, Texas
Andrew Howell, Shawnee County, KS Election Commissioner
Shawnee County, KS Election Office Representative

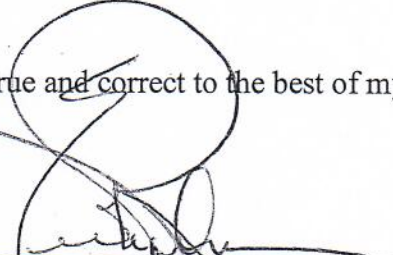
I, Eric K. Rucker, Assistant Secretary of State for the State of Kansas, being first duly sworn state that I have reviewed the probable cause affidavit submitted by Mr. Bryan Caskey, Deputy Assistant Secretary of State. Thereafter, I composed the Complaint/Information in this matter. I know the content thereof, and the same is true to the best of my information and belief.

~~FOR THE SECRETARY:~~


Eric K. Rucker, #11109
Assistant Secretary of State
120 SW 10th Ave., Room 140
Topeka, Kansas 66611
785.296.2034
785.368.8032 (FAX)
eric.rucker@sos.ks.gov

I verify under penalty of perjury that the foregoing is true and correct to the best of my information and belief.

Executed this 19th day of January, 2017.


Eric K. Rucker, #11109
Assistant Secretary of State