

CASP 2021003363  
TPD 2021-00006343  
SNSO 2021-00020730

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

**STATE OF KANSAS,  
Plaintiff,**

**vs.**

**Case No.  
DA No. 21-1339  
Division No. \_\_\_\_\_**

**GENE M SUELLENTROP,  
Defendant.**

**COMPLAINT/INFORMATION**

**COMES NOW**, Kevin S Keatley, a duly appointed, qualified and acting Assistant 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  
FLEEING OR ATTEMPTING TO ELUDE A POLICE OFFICER  
K.S.A. 8-1568(b)  
Level 9 Person Felony

On or about the 16th of March, 2021, in the State of Kansas and County of Shawnee, GENE M SUELLENTROP, did, then and there, unlawfully drive a motor vehicle and willfully failed or refused to bring such driver's vehicle to a stop or otherwise attempted to elude a pursuing police vehicle or police bicycle, when given audible or visual signal to stop by a police officer, who was in uniform or a marked police vehicle or bicycle, and the Offender, failed to stop for a police roadblock, drove around a tire deflating device placed by a police officer, engaged in reckless driving, was involved in a motor vehicle accident, intentionally caused damage to property, committed five or more moving violations, and/or attempt to elude capture for the commission of any felony, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

Count 2

DRIVING UNDER THE INFLUENCE; FIRST OFFENSE

K.S.A. 8-1567(a)(1-5),(b)(1)(A)

Class B Non Person Misdemeanor

On or about the 16th of March, 2021 in the State of Kansas and County of Shawnee, GENE M SUELLENTROP, did, then and there, unlawfully operate or attempt to operate a motor vehicle while: (1) the alcohol concentration in the Offender's blood or breath as shown by any competent evidence, including other competent evidence, is .08 or more; (2) the alcohol concentration in the Offender's blood or breath, as measured within three hours of the time of operating or attempting to operate a vehicle, is .08 or more; (3) under the influence of alcohol to a degree rendered the Offender incapable of safely driving a vehicle; (4) under the influence of any drug or combination of drugs to a degree that rendered the Offender incapable of safely driving a vehicle; (5) under the influence of a combination of alcohol and any drug or drugs to a degree that renders the Offender incapable of safely driving a vehicle; contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

Count 3

RECKLESS DRIVING

K.S.A. 8-1566

On or about the 16th of March, 2021 in the State of Kansas and County of Shawnee, GENE M SUELLENTROP, did, then and there, unlawfully drive a motor vehicle in a reckless manner as to indicate a willful or wanton disregard for the safety of persons or property, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

Count 4

DRIVING WRONG WAY ON DIVIDED HIGHWAY

K.S.A. 8-1524(e)

On or about the 16th of March, 2021 in the State of Kansas and County of Shawnee, GENE M SUELLENTROP, did, then and there, unlawfully drive a motor vehicle the wrong way on a divided roadway, contrary to the form of the statutes in such case made and provided and against the peace and dignity of the State of Kansas.

Count 5

SPEEDING  
K.S.A. 8-1558

On or about the 16th of March, 2021 in the State of Kansas and County of Shawnee, GENE M SUELLENTROP, did, then and there, unlawfully drive a motor vehicle on a roadway in a posted 65 mile per hour zone at a speed of 90 miles per hour, 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:

Murray J Dines  
KBI Lab Personnel  
Lt. Matt Biltoft, DOC, SNCO#26  
Stormont Vail Hospital Personnel  
Topeka Fire Personnel  
AMR Personnel  
Shawnee County Dispatch Personnel  
Trooper Austin James Shepley, CASP#1065  
Sheri L Sisco, KBILA#  
Kent Selk  
Paige Ledesma  
Kelsey William  
Nicholas Hill

Kevin S Keatley, Assistant 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: / Kevin S Keatley/  
Kevin S Keatley,#25047  
Assistant District Attorney  
200 SE 7<sup>th</sup> 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 26th day of March, 2021.

By: / Kevin S Keatley/  
Kevin S Keatley,#25047  
Assistant District Attorney

BOND REQUEST \$ 5,000.00

With Prof. Surety/Cash

OR

As Set

Summons to Issue in Lieu of Warrant

No Contact With Victim

No Contact With Co-Defendants/CoRespondants

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