

SNSO 18-08021

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

**STATE OF KANSAS,  
Plaintiff,**

**vs.**

**Case No.  
DA No. 19-6609  
Division No. \_\_\_\_\_**

**PAMELA G BUCKHALTER,  
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

THEFT; \$1,500 TO \$25,000  
K.S.A. 21-5801(a)(1),(b)(3)  
Level 9, Non-Person Felony

On or about the 24th of July, 2015 through the 17th of October, 2017, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully and feloniously, obtain or exert unauthorized control over property or services, to-wit: U.S. Currency, with the intent to permanently deprive the owner, to-wit: Soldier Township (HSA and KPERS Accounts of Buckhalter), of the possession, use or benefit of said property, having a value of at least \$1,500 but less than \$25,000, 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

THEFT; \$1,500 TO \$25,000  
K.S.A. 21-5801(a)(1),(b)(3)  
Level 9, Non-Person Felony

On or about the 24th of July, 2015 through the 17th of October, 2017, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully and feloniously, obtain or exert unauthorized control over property or services, to-wit: U.S. Currency, with the intent to permanently deprive the owner, to-wit: Soldier Township (HSA Account of Lady), of the possession, use or benefit of said property, having a value of at least \$1,500 but less than \$25,000, 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

THEFT; \$1,500 TO \$25,000  
K.S.A. 21-5801(a)(1),(b)(3)  
Level 9, Non-Person Felony

On or about the 4th of March, 2016 through the 17th of October, 2017, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully and feloniously, obtain or exert unauthorized control over property or services, to-wit: U.S. Currency, with the intent to permanently deprive the owner, to-wit: Soldier Township (HSA Account of Hamilton), of the possession, use or benefit of said property, having a value of at least \$1,500 but less than \$25,000, 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

THEFT; \$1,500 TO \$25,000  
K.S.A. 21-5801(a)(1),(b)(3)  
Level 9, Non-Person Felony

On or about the 6th of January, 2017 through the 17th of October, 2017, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully and feloniously, obtain or exert unauthorized control over property or services, to-wit: U.S. Currency, with the intent to permanently deprive the owner, to-wit: Soldier Township (HSA Account of Burris), of the possession, use or benefit of said property, having a value of at least \$1,500 but less than \$25,000, 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

THEFT; \$1,500 TO \$25,000

K.S.A. 21-5801(a)(1),(b)(3)

Level 9, Non-Person Felony

On or about the 6th of January, 2017 through the 17th of October, 2017, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully and feloniously, obtain or exert unauthorized control over property or services, to-wit: U.S. Currency, with the intent to permanently deprive the owner, to-wit: Soldier Township (HSA Account of Downing), of the possession, use or benefit of said property, having a value of at least \$1,500 but less than \$25,000, 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 6

FORGERY; MAKING, ALTERING, OR ENDORSING

K.S.A. 21-5823(a)(1)

Level 8, Non Person Felony

On or about the 7th of December, 2017 through the 14th of December, 2017, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully, feloniously, and with the intent to defraud, make, alter or endorse a written instrument, to-wit: check #46783 on the purported Core First Bank & Trust Account of Soldier Township, in such manner that it appeared to have been made or endorsed by another person, either real or fictitious, to-wit: Gary Groves and/or Jerry Glasgoward/or Brian Herrick; or at another time; or with different provisions; or by the authority of another, to-wit: Gary Groves and/or Jerry Glasgow and/or Brian Herrick, who did not give such authority, 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 7

UNLAWFUL ACTS CONCERNING COMPUTERS

K.S.A. 21-5839(a)(2)

Level 8, Non Person Felony

On or about the 31st of March, 2017 through the 31st of October, 2017, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully, feloniously, and knowingly use a computer, computer system, computer network or any other property for the purpose of devising or executing a scheme or artifice with the intent to defraud or for the purpose of obtaining money, property, services or any other thing of value by means of false or fraudulent pretense or representation, 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 8

THEFT- Less than \$1,000

K.S.A. 21-5801(a)(1)(b)(4)

Class A Nonperson Misdemeanor

On or about the 24th of July, 2015 through the 25th of December, 2015, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully and intentionally, obtain or exert unauthorized control over property or services, to-wit: U.S. Currency, and with the intention to permanently deprive the owner, to-wit: Soldier Township (HSA Account of Cook), of the possession, use or benefit of said property, having a value of less than \$1,000, 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 9

THEFT- Less than \$1,000

K.S.A. 21-5801(a)(1)(b)(4)

Class A Nonperson Misdemeanor

On or about the 24th of July, 2015 through the 25th of December, 2015, in the State of Kansas and County of Shawnee, PAMELA G BUCKHALTER, did, then and there, unlawfully and intentionally, obtain or exert unauthorized control over property or services, to-wit: U.S. Currency, and with the intention to permanently deprive the owner, to-wit: Soldier Township (HSA Account of Vess), of the possession, use or benefit of said property, having a value of less than \$1,000, 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:

Steven W Vess  
Gary A Groves  
Soldier Township  
KPERS Records Custodian  
Shiloh Austin Burris  
KBI Lab Personnel  
Juston Lawrence Drake, SNSO#  
Karl McNorton  
Christopher D Hamilton  
Records Custodian Core First Bank  
Chad Lady  
Robert Leon Oliva  
Kenton Cook  
Michael Bailey

Lt. Matt Biltoft, DOC, SNCO#26  
Shawnee County Dispatch Personnel  
Topeka Fire Personnel  
AMR Personnel  
Nicholas Hill  
Det. Stephanie Dicken, SNSO#787  
Melanie Mills-Bergers, SNSO#  
Larkin Downing  
Optum Bank Records Custodian  
Carolyn Bruner  
Diane Coffman  
Jerry W Glasgow  
Brian Herrick

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 23rd day of July, 2020.

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

BOND REQUEST §

- 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