

IN THE DISTRICT COURT OF KANSAS
EIGHTEENTH JUDICIAL DISTRICT
SEDGWICK COUNTY, CRIMINAL DEPARTMENT

FILED

2005 MAR 1 PM 2 19

CLERK OF DIST. COURT
18TH JUDICIAL DISTRICT
SEDGWICK COUNTY, KS

BY

THE STATE OF KANSAS)
)
) *Plaintiff,*)
)
)
) vs.)
)
)
) DENNIS L. RADER,)
) W/M, DOB: 03/09/45,)
) SSN: 514-42-4814,)
) *Defendant.*)
)

Case No.

05CR 498

COMPLAINT/INFORMATION
COUNT ONE

COMES NOW KIM T. PARKER, a duly appointed, qualified and acting Deputy District Attorney of the 18th Judicial District of the State of Kansas, and for and on behalf of said State gives the court to understand and be informed that in the County of Sedgwick, and State of Kansas, and on or about the 15th day of January, 1974, A.D., one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Joseph Otero, maliciously, willfully, deliberately and with premeditation by strangulation and/or asphyxiation, inflicting injuries from which the said Joseph Otero did die on or about January 15, 1974;

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count One

COUNT TWO

and on or about the 15th day of January, 1974, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Julie Otero, maliciously, willfully, deliberately and with premeditation by strangulation, inflicting injuries from which the said Julie Otero did die on or about January 15, 1974;

COUNT THREE

and on or about the 15th day of January, 1974, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Josephine Otero, maliciously, willfully, deliberately and with premeditation by strangulation, inflicting injuries from which the said Josephine Otero did die on or about January 15, 1974;

COUNT FOUR

and on or about the 15th day of January, 1974, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Joseph Otero, Jr., maliciously, willfully, deliberately and with premeditation by strangulation and/or asphyxiation, inflicting injuries from which the said Joseph Otero, Jr. did die on or about January 15, 1974;

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Two

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Three

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Four

COUNT FIVE

and on or about the 4th day of April, 1974, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Kathryn Bright, maliciously, willfully, deliberately and with premeditation by strangulation and stabbing, inflicting injuries from which the said Kathryn Bright did die on April 4, 1974;

COUNT SIX

and on or about the 17th day of March, 1977, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Shirley Vian, maliciously, willfully, deliberately and with premeditation by strangulation, inflicting injuries from which the said Shirley Vian did die on March 17, 1977;

COUNT SEVEN

and on or about the 8th day of December, 1977, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Nancy Fox, maliciously, willfully, deliberately and with premeditation by strangulation, inflicting injuries from which the said Nancy Fox did die on December 8, 1977;

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Five

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Six

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Seven

COUNT EIGHT

and on or about the 27th day of April, 1985, A.D., to the 28th day of April, 1985, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Marine Hedge, maliciously, willfully, deliberately and with premeditation by strangulation, inflicting injuries from which the said Marine Hedge did die on April 27, 1985;

COUNT NINE

and on or about the 16th day of September, 1986, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Vicki Wegerle, maliciously, willfully, deliberately and with premeditation by strangulation, inflicting injuries from which the said Vicki Wegerle did die on September 16, 1986;

COUNT TEN

and on or about the 18th day of January, 1991, A.D., to the 19th day of January, 1991, A.D., in the County of Sedgwick, State of Kansas, one DENNIS L. RADER did then and there unlawfully, kill a human being, to-wit: Dolores E. Davis, maliciously, willfully, deliberately and with premeditation by strangulation, inflicting injuries from which the said Dolores E. Davis did die on January 19, 1991;

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Eight

Contrary to Kansas Statutes Annotated 21-3401, Murder in the First Degree, Class A Felony [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1], Count Nine

Contrary to Kansas Statutes Annotated 21-3401(a), Murder in the First Degree, Off-Grid Person Felony, [L. 1969, ch. 180, § 21-3401; L. 1972, ch. 112, § 1; July 1, L. 1989, ch. 87, § 1, L. 1990, ch. 100, § 2] Count Ten

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.

Kim T. Parker
KIM T. PARKER, #11203
Deputy District Attorney

State Of Kansas)
) ss:
Sedgwick County)

KENNETH F. LANDWEHR, being first duly sworn, states that I have read the above and foregoing Complaint/Information and know the contents thereof, and that the same is true in substance and in fact.

Kenneth F. Landwehr
KENNETH F. LANDWEHR
Complaining Witness

SUBSCRIBED AND SWORN to before me on this 1st day of March, 2005.



Donna J. Monarez
NOTARY PUBLIC

State Of Kansas)
) ss:
Sedgwick County)

VERIFICATION:

KIM T. PARKER, Deputy District Attorney for the 18th 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.

Kim T. Parker
KIM T. PARKER, #11203
Deputy District Attorney

SUBSCRIBED AND SWORN to before me on this 1st day of March, 2005.

Joseph H. Walker
JUDGE OF THE DISTRICT COURT

STATE WITNESSES:

- CW: LT. K. F. LANDWEHR, #1031, WPD
- Det. D. E. Gouge, #1326, WPD
- Det. K. M. Otis, 1256, WPD
- Det. T. G. Relph, #1280, WPD

[STATE'S WITNESS LIST CONTINUED]

05CR 498

STATE'S WITNESS LIST - RADER

Det. R. R. Stone, #1352, WPD

S.A. R. Lundin, FBI

Sgt. T. Lee, #D0432, SO

Capt. S. R. Houston, #D0235

Lab. Inv. P. Cunningham, #V0828, WPD

Det. C. L. James, #1225, WPD

djm/KTP/WPD

02/28/05