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**FOURTEENTH JUDICIAL DISTRICT
DISTRICT COURT OF MONTGOMERY COUNTY, KANSAS**

State of Kansas,

Plaintiff,

vs.

Case No. **MGI-2023-CR-000347**

**William Keith Dodd,
102 S Ohio St
Coffeyville, Ks 67337**

Defendant.

AGENCY: Coffeyville Police Department #23-11311

AMENDED COMPLAINT / INFORMATION

COMES NOW the State of Kansas, by and through Stephanie R. Plaschka, duly qualified and appointed, Assistant County Attorney, for and on behalf of the State of Kansas alleges and states for its *Amended Complaint / Information* against the defendant, **William Keith Dodd**:

COUNT I

Rape - Victim under 14

That on or between the 1st day of January, 2023 and the 11th day of September, 2023, in Montgomery County, Kansas, **WILLIAM KEITH DODD** did unlawfully and feloniously engage in sexual intercourse with a child under 14 years of age, to-wit: LNN (DOB: xx/xx/2010). **Rape**, in violation of K.S.A. 21-5503(a)(3) & (b)(1)(B), a severity level 1-person felony.(Penalty Range: From a minimum of 147 months to a maximum of 653 months in prison and/or a fine of up to \$300,000 and 36 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(2), & 22-3717(d)(1)(A), and amendments thereto.)

COUNT II
Rape - Victim under 14

That on or between the 1st day of January, 2023 and the 11th day of September, 2023, in Montgomery County, Kansas, **WILLIAM KEITH DODD** did unlawfully and feloniously engage in sexual intercourse with a child under 14 years of age, to-wit: LNN (DOB: XX/XX/2010). **Rape**, in violation of K.S.A. 21-5503(a)(3) & (b)(1)(B), a severity level 1-person felony. (Penalty Range: From a minimum of 147 months to a maximum of 653 months in prison and/or a fine of up to \$300,000 and 36 months of post-release supervision, pursuant to K.S.A. 21-6804, 21-6807, 21-6611(a)(2), & 22-3717(d)(1)(A), and amendments thereto.)

All of the said acts then and there committed being contrary to the statutes in such cases made and provided and being against the peace and dignity of the State of Kansas.

WITNESSES:

LNN (xx/xx/2010)
Kanecia Brown
Brenda Diane Dodd
Jeremiah David Keith Dodd
Tina Marie Eckert
Dusty Adams
Jason Kastler
Jesse Moley
Stephine Randall
Lucas Vargas

/s/ Stephanie R. Plaschka
Stephanie R. Plaschka, #28233
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VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF MONTGOMERY)

Stephanie R. Plaschka, duly qualified and appointed Assistant County Attorney, authorized and empowered to prosecute for and on behalf of the State of Kansas, Montgomery County, of lawful age, being first duly sworn on oath deposes and states that the matters and things set forth and contained in the above and foregoing *Amended Complaint / Information* are true and correct as informed and to the best of my knowledge and belief, so help me God.

/s/ Stephanie R. Plaschka _____
Stephanie R. Plaschka, #28233
Montgomery County Attorney

Subscribed and sworn to before me on February 27, 2024.

/s/ Sadie Sewell _____
Notary Public
My term expires: March 27, 2027 _____