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

State of Kansas,

Plaintiff,

vs.

Case No.

**Madeline Nichole Traughber,
210 S. Second Street
Independence, KS 67301**

Defendant.

AGENCY: Kansas Bureau of Investigation #24-737

COMPLAINT / INFORMATION

COMES NOW the State of Kansas, by and through Melissa G. Johnson, duly qualified and appointed, Montgomery County Attorney, for and on behalf of the State of Kansas alleges and states for its *Complaint / Information* against the defendant, **Madeline Nichole Traughber**:

COUNT I

Aggravated Indecent Liberties with a Child

That on or between January 1, 2023 and November 29, 2024, in Montgomery County, Kansas, **MADLINE NICHOLE TRAUGHBER** did unlawfully and feloniously engage in lewd fondling or touching with a child who was under 14 years of age, to-wit: EH (DOB: xx/xx/2023), with the intent to arouse or satisfy the sexual desires of the offender, the child, or both, while the offender was 18 years of age or older, to wit: DOB: xx/xx/1989, **Aggravated Indecent Liberties with a Child, an off-grid person felony**, in violation of K.S.A. 21-5506(b)(3)(A) & (c)(3). (Penalty Range: Life imprisonment in the custody of the Secretary of Corrections, with a mandatory minimum term of imprisonment of not less than 25 years or a sentence equal to the

sentence established for a severity level 1 crime pursuant to the sentencing guidelines grid for non-drug crimes (up to 653 months), whichever is greater. The defendant shall not be eligible for parole prior to serving such mandatory minimum term of imprisonment, and such mandatory minimum term of imprisonment shall not be reduced by the application of good time credits. Further the defendant may be fined up to \$500,000.00. Upon release from imprisonment, the defendant shall be subject to electronic monitoring for the remainder of the person's life and shall reimburse the State for all or part of the cost of such monitoring, all pursuant to K.S.A. 21-6804, K.S.A. 21-6611(a)(1), K.S.A. 21-6627(a)(1) and K.S.A. 22-3717(u) & (v), and amendments thereto.)

COUNT II

Aggravated Indecent Liberties with a Child

That on or between January 1, 2023 and November 29, 2024, in Montgomery County, Kansas, **MADLINE NICHOLE TRAUGHBER** did unlawfully and feloniously engage in lewd fondling or touching with a child who was under 14 years of age, to-wit: EH (DOB: xx/xx/2023), with the intent to arouse or satisfy the sexual desires of the offender, the child, or both, while the offender was 18 years of age or older, to wit: DOB: xx/xx/1989, **Aggravated Indecent Liberties with a Child, an off-grid person felony**, in violation of K.S.A. 21-5506(b)(3)(A) & (c)(3). (Penalty Range: Life imprisonment in the custody of the Secretary of Corrections, with a mandatory minimum term of imprisonment of not less than 25 years or a sentence equal to the sentence established for a severity level 1 crime pursuant to the sentencing guidelines grid for non-drug crimes (up to 653 months), whichever is greater. The defendant shall not be eligible for parole prior to serving such mandatory minimum term of imprisonment, and such mandatory minimum term of imprisonment shall not be reduced by the application of good time credits. Further the defendant may be fined up to \$500,000.00. Upon release from imprisonment, the defendant shall be subject to electronic monitoring for the remainder of the person's life and shall reimburse the State for all or part of the cost of such monitoring, all pursuant to K.S.A. 21-6804, K.S.A. 21-6611(a)(1), K.S.A. 21-6627(a)(1) and K.S.A. 22-3717(u) & (v), and amendments thereto.)

COUNT III

Aggravated Criminal Sodomy

That on or between January 1, 2023 and November 29, 2024, in Montgomery County, Kansas, **MADLINE NICHOLE TRAUGHBER** did unlawfully and feloniously engage in sodomy with a child under 14 years of age, to-wit: EH (DOB: xx/xx/2023), while the offender was 18 years of age or older, to wit: xx/xx/1989, **Aggravated Criminal Sodomy, an off-grid person felony**, in violation of K.S.A. 21-5504(b)(1) & (c)(3). (Penalty Range: Life imprisonment in the custody of the Secretary of Corrections, with a mandatory minimum term of imprisonment of not less than 25 years or a sentence equal to the sentence established for a severity level 1 crime pursuant to the sentencing guidelines grid for non-drug crimes (up to 653 months), whichever is greater. The defendant shall not be eligible for parole prior to serving

such mandatory minimum term of imprisonment, and such mandatory minimum term of imprisonment shall not be reduced by the application of good time credits. Further the defendant may be fined up to \$500,000.00. Upon release from imprisonment, the defendant shall be subject to electronic monitoring for the remainder of the person's life and shall reimburse the State for all or part of the cost of such monitoring, all pursuant to K.S.A. 21-6804, K.S.A. 21-6611(a)(1), K.S.A. 21-6627(a)(1) and K.S.A. 22-3717(u) & (v), 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:

E H
Julia Margaret Ames
Kenisha Morton
H W
John Anderson
Jeremy Newman
Aaron Simmons
Kayla Gatz

/s/ Melissa G. Johnson
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