

**IN THE DISTRICT COURT OF LYON COUNTY, KANSAS
CRIMINAL DIVISION**

THE STATE OF KANSAS, Plaintiff

v. **Case No. 2021-CR-000367**

ANDREW JOHN GRANADO, Defendant.

COMPLAINT/INFORMATION

COMES NOW, Amy L Aranda, First Assistant County Attorney of Lyon County, Kansas, and for and on behalf of the State of Kansas, gives the Court to understand and be informed:

Count 1 - Conspiracy murder in the 1st degree; Intentional and premeditated

That on, about, or between the 1st day of August, 2017 and the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully, feloniously, intentionally and with premeditation agree with another person, to-wit: Samuel Garcia. and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo Campoverde, to commit or assist in the commission of the crime of First Degree Murder, to-wit: killing a human being, to-wit: Jesus Avila Jr, and an overt act, to-wit: Samuel Garcia obtained a .22 caliber pistol; Andrew John Granado, Samuel Garcia, Jovan Pecina, Alan Alanis, Armando Nunez and Jordy Cornejo Campoverde communicated through social media applications and/or electronic devices to aid in the commission of the crime; Andrew John Granado, Samuel Garcia, Jovan Pecina, Alan Alanis, Armando Nunez. and Jordy Cornejo Campoverde skipped school and met at Cornejo Campoverde's house; Samuel Garcia contacted Jesus Avila, Jr.; Samuel Garcia and Jovan Pecina left with Jesus Avila, Jr. in Avila's vehicle; Samuel Garcia shot and killed Jesus Avila, Jr.; Andrew John Granado drove himself, Alan Alanis, Armando Nunez and Jordy Cornejo Campoverde and took gasoline to a predesignated location where they met Samuel Garcia and Jovan Pecina, with Avila's vehicle and body; Andrew John Granado and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo Campoverde removed U.S. currency, a speaker, and an AK47 rifle from Avila's vehicle, Andrew John Granado and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo Campoverde burned Avila's vehicle and body using the gasoline provided; Andrew John Granado drove Samuel Garcia, Alan Alanis, Armando Nunez, Jovan Pecina. and Jordy Cornejo Campoverde back to Cornejo Campoverde's house; Samuel Garcia, Alan Alanis and Jordy Cornejo Campoverde disposed of the .22 caliber pistol; Andrew John Granado and/or Samuel Garcia. and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo Campoverde distributed the U.S. currency amongst themselves and concealed the speaker and AK47 rifle, in furtherance of the conspiracy was committed by Andrew John Granado and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez, and/or Jordy Cornejo-Campoverde. In violation of K.S.A. 21-5302 and K.S.A. 21-5402 (a) (1), and against the peace and dignity of the State of Kansas (Severity Level 2 Person Felony) [21.5402.a.1/con]

Count 2 - Murder in the 1st degree; Intentional and premeditated

That on or about the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully, feloniously, intentionally and with premeditation, kill a human being, to wit: Jesus Avila Jr. In violation of K.S.A. 21-5402, and against the peace and dignity of the State of Kansas. (First Degree Murder, an off-grid person felony) [21.5402.a.1]

OR IN THE ALTERNATIVE

Count 2 - Murder in the 1st degree; In the commission of a felony

That on about the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully and feloniously kill a human being, to-wit: Jesus Avila Jr, during the commission of, attempt to commit, or flight from the commission of an inherently dangerous felony, to-wit: aggravated robbery, as defined in K.S.A. 21-5420(b) and amendments thereto. In violation of K.S.A. 21-5402, and against the peace and dignity of the State of Kansas. (Off-grid Person Felony) [21.5402.a.2]

OR IN THE ALTERNATIVE

Count 2 - Murder in the 1st degree; In the commission of a felony

That on or about the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully and feloniously kill a human being, to wit: Jesus Avila Jr, during the commission of, attempt to commit, or flight from the commission of an inherently dangerous felony, to-wit: a felony offense as provided in K.S.A. 21-5703, 21-5705 or 21-5706, and amendments thereto, to-wit: distribution of marijuana. In violation of K.S.A. 21-5402, and against the peace and dignity of the State of Kansas. (Off-grid Person Felony) [21.5402.a.2]

Count 3 - Conspiracy aggravated robbery; Armed w/ dangerous weapon

That on or between the 1st day of August, 2017 and the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully, feloniously and knowingly, agree with another person, to-wit: Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez, and/or Jordy Cornejo-Campoverde, to commit or assist in the commission of the crime of Aggravated Robbery, while armed with a dangerous weapon, to-wit: a .22 caliber pistol, to take property, to-wit: US currency, AK47 rifle, speaker, and Nissan Altima vehicle, from the person or presence of Jesus Avila Jr, by force, or by threat of bodily harm to any person, and an overt act, to-wit: Samuel Garcia obtained a .22 caliber pistol; Andrew John Granado, Samuel Garcia, Jovan Pecina, Alan Alanis, Armando Nunez and Jordy Cornejo Campoverde communicated through social media applications and/or electronic devices to aid in the commission of the crime; Andrew John Granado, Samuel Garcia, Jovan Pecina, Alan Alanis,

Armando Nunez and Jordy Cornejo Campoverde skipped school and met at Cornejo Campoverde's house; Samuel Garcia contacted Jesus Avila, Jr.; Samuel Garcia and Jovan Pecina left with Jesus Avila, Jr. in Avila's vehicle; Samuel Garcia shot and killed Jesus Avila, Jr.; Andrew John Granado drove himself, Alan Alanis, Armando Nunez and Jordy Cornejo Campoverde and took gasoline to a predesignated location where they met Samuel Garcia and Jovan Pecina with Avila's vehicle and body; Andrew John Granado and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo Campoverde removed U.S. currency, a speaker, and an AK47 rifle from Avila's vehicle, Andrew John Granado and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo Campoverde burned Avila's vehicle and body using the gasoline provided; Andrew John Granado drove Samuel Garcia, Alan Alanis, Armando Nunez, Jovan Pecina and Jordy Cornejo Campoverde back to Cornejo Campoverde's house; Samuel Garcia, Alan Alanis and Jordy Cornejo Campoverde disposed of the .22 caliber pistol; Andrew John Granado and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo Campoverde distributed the U.S. currency amongst themselves and concealed the speaker and AK47 rifle, in furtherance of the conspiracy was committed by Andrew John Granado and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Jordy Cornejo-Campoverde. In violation of K.S.A. 21-5420(b)(1), and against the peace and dignity of the State of Kansas. (Severity Level 5 Person Felony) [21.5420.b.1/con]

Count 4 - Aggravated robbery; Inflicts bodily harm

That on or about the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully, feloniously and knowingly take property, to-wit: US Currency, AK47 rifle, speaker, Nissan Altima vehicle, from the person or presence of Jesus Avila Jr, by force, or by threat of bodily harm to any person, and during the course of such robbery, bodily harm was inflicted upon Jesus Avila Jr. In violation of K.S.A. 21-5420(b), and against the peace and dignity of the State of Kansas. (Severity Level 3 Person Felony) [21.5420.b.2]

OR IN THE ALTERNATIVE

Count 4 - Theft of property or services; Value less than \$1,500

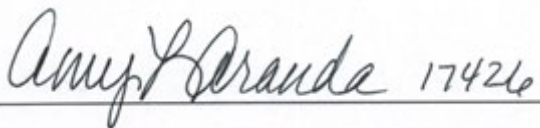
That on or about the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully obtain or exert unauthorized control over property or services worth less than \$1,500.00, to-wit: US currency, AK47 rifle, and speaker, with the intent to permanently deprive the owner, to-wit: Jesus Avila Jr, of the possession, use or benefit of such property or services. In violation of K.S.A. 21-5801(a)(1) & (b)(4), and against the peace and dignity of the State of Kansas. (Class A Nonperson Misdemeanor) [21.5801.a.1.b4]

Count 5 - Arson; Intentional to non-dwelling of another without consent

That on or about the 5th day of September, 2017, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully, feloniously, and knowingly damage by means of fire or explosive, property which is not a dwelling, to-wit: Nissan Altima vehicle, in which Jesus Avila Sr and/or Jesus Avila Jr have an interest and who did not consent to said damage. In violation of K.S.A. 21-5812(a)(1)(C), and against the peace and dignity of the State of Kansas. (Severity Level 7 Non-person Felony) [21.5812.a.1.C]

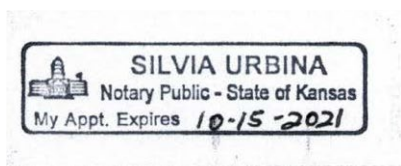
Count 6 - Interference with LEO; Conceal/alter/destroy evidence in felony case

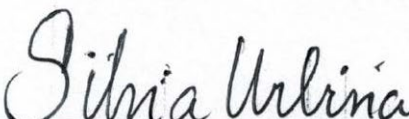
That on, about, or between the 5th day of September, 2017, and the 3rd day of March, 2018, in Lyon County, Kansas, Andrew John Granado, then and there being present did unlawfully, feloniously and knowingly conceal, destroy or materially alter evidence with the intent to prevent or hinder the apprehension or prosecution of any person, and further said act was committed in the case of a felony. In violation of K.S.A. 21-5904(a)(2) & (b)(4)(B), and against the peace and dignity of the State of Kansas. (Severity Level 8 Non-person Felony) [21.5904.a2.b4.B]

 17426

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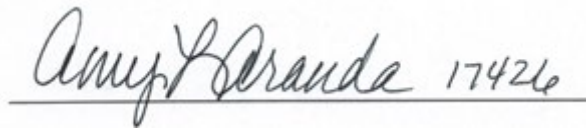
SUBSCRIBED AND SWORN TO before me this 13th day of September, 2021.




Silvia Urbina, Notary Public

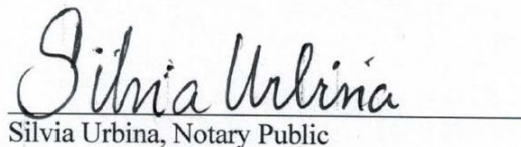
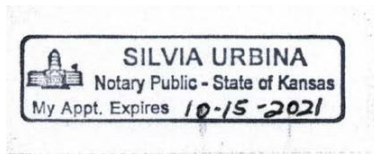
STATE OF KANSAS, COUNTY OF LYON, ss:

Amy L. Aranda, for and on behalf of said county, within and for said State, being by me first duly sworn says that she has read the above and foregoing Complaint/Information and knows the contents thereof, and that the same is true in substance and in fact to her best information and belief.



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Emporia, KS 66801
Attorney for Plaintiff
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aaranda@lyoncounty.org

SUBSCRIBED AND SWORN TO before me this 13th day of September, 2021.



Silvia Urbina, Notary Public

WITNESSES:

Jesus Avila Jr
Alan Alanis
Erica Alanis
Guadalupe Alanis
Lyrisa Dianne Enedina Alanis
Silvia Alanis-Cornejo
Esmeralda Aldrete
Maria Isabel Aldrete
Daniel Enrique Arteaga
AT&T Wireless
Maria Virginia Avila
Marilu Lou Avila
Erick Bahena

Antonio Rafael Baker
Enrique Baray
Nate Barrett
Paul Patrick Beadles
Jadena C Benson
Jerica Brewer
Leslie Esperanza Caballero
Carina Calderon
Leon Devante Caldwell
Maria Campoverde
Shelby Jordan Carson
Casey's General Store
Jocelyn Castillo
Jonathan Calderron Castillo Jr
Osiel Cecenas
Alexis Ignacio Chaparro
Cesar Esteban Chaparro
Miguel Angel Chaparro
Victor Hugo Chaparro
Matthew Coleman
Community National Bank & Trust Records/Surveillance
Consumer Cellular, Records Custodian
Jordy Cornejo-Campoverde
Alexander Couch
Cricket Communications, Records Custodian
Quentin A D'Angelo
Oscar De La Luz
Garrett Michael Dingman
Alexander Doktor
Lukas John Durler
Trisha Ellis
Emporia Orthodontics, Records Custodian
Facebook, Inc., Custodian of Records
Flint Hills Community Health Center, Rec Custodian
Flint Hills Learning Center, Records Custodian
Keith D Foster
Larry L Fowler
Dan O Fruit
Daniel Garcia
Joshua Garcia

Martina Garcia
Maximo Garcia
Samuel Garcia
Sandy Azucena Garcia
Simon Samuel Garcia
Danny Geifer
Gerry's Pawn, Representative of
Henry Gomez
Kevin Soto Gomez
Google Inc, Records Custodian
Karly Maddox Goulden
Andrew John Granado
Eluterio N Granado III
Eluterio N Granado Jr
Nichole Granado
Olivia M Granado
Miguel Ignacio Gudino
Maria Del Pilar Guevara
Kevin Ronald Guevara-Barba
Olivia Catherine Hamlin
Cathryn White Harrison
Britton N Hart
Maryann Hartman
Stephen R Haught Dr
Alberto Gasca Hernandez
Alexander Raeshawn Hernandez
Francisco Javier Hernandez
Roel Andres Hernandez
Selena Hernandez
Daniel Luis Herrera
Rebecca A Herrera
Hills Pet Food
Hopkins Manufacturing Corp, Records Custodian
Hostetler & Associates
Victor Ibarra
Instagram, Records Custodian
Allyson Jensen
Carlos Manuel Jerez
Eric J Kirby
KVOE Radio Station, Representative of
Bryan Antonio Landaverde

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Terrance Charles Latta
Angel Lemus
Isabel Garcia Lopez
Lyon County Road & Bridge Dept, Records Custodian
Fabiola Maria Magana
Jonathon Manzano
Kimberly Sue Marchand
Trevor Matthews
Kadon Dane McClellan
John Andrew Meyers
Kenneth W Mildward
Carlos Michael Morales-Rose
Guadalupe Murillo
Efigenia Nonoal
Juan Nonoal
Armando Nunez
Jennifer Alyse Padron
Melchor M Pahuamba
Ulises Efren Palomares Ambriz
Jovan Pecina
Leticia Pecina
Karrie Pfantz
Shane Pruitt
Trinity Maureen Pruitt
Q-Link Wireless, LLC, Records Custodian
Jose Arturo Ramirez
Carlos Renteria
Marilyn Renteria
Randy Rethman
Carolyn Lea Risley
Roberts-Blue-Barnett Funeral Home
Tony Jon Robinson
Jennifer A Rodriguez
Diego Andres Rugel
Alonso Salas
Kevin A Sandoval
Wilver Adonay Sandoval
Braden Lee Schuler
Jacob Lewis Slater-Figueroa
Snapchat, Custodian of Records
Diveli Soto

Sprint/Nextel Rep. of and records custodian
Shea Stevens
T-Mobile Rep. of and records custodian
Tomasia Rebecca Trujillo
US Cellular, Custodian of Records
USD #253, Records Custodian Rebecca Smith or Larry Clay
Adilene Velazquez
Marcos Velazquez
Nelsy Velazquez
Omar Velazquez
Lloyd Velez
Verizon Wireless Rep. of and records custodian
Adolfo Viveros
Kagen White
William Allen White Elementary School, Rep. of
Elijah Williams
Taylor B Wilson
Alan Wise
Bryan Jesus Zapata
Jesus Zepeda
Jaffar Agha
Brian Alwes
Dan Arb
Harley Arnold
Jim Baker
Kevin Bauman
Courtney Bautel
Shelby Bell
Karen Blanton
Ryan Boyer
Reason Bradford
David Brede
James Bridges
Mick Brinkmeyer
Clint Brock
Jim Brockman
Tera Brooks
Danny Broyles
Samantha Buck
Vikki Buell
Steven Bundy
Ronnie Burk

Jon Byrd
Justin Carr
Anthony Celeste
Arnold Chavez
Larry Clay
Amber Cole
Jeff Cope
Brad Crow
Steve Dall
Kelly Davis
Paul Decker
Nicole Dekat
Pablo Daniel Delgadillo
Dennis Delmott
Jason Diaz
Kelby Dickensheet
Lane G Doty
Casey Dougherty
Brandon Early
Lonnie Edgecomb
Daniel Evans
Jarrod Fell
Callie Fishburn
Rex Fisher
Tim Flohrshutz
Jemiah Fournier
Laura Frederickson
Mackenzie Garcia
Jason Gifford
Tera Gifford
Jarrod Gill
Steve Gillespie
Taylor Gladding
Tyler Goldsby
Aaron Hachmeister
Jacqueline Hayworth
Garland Hendrickson
Dr Arnold, DDS Hermanson
Marcial Hernandez
Andy Herrera
Lance Hockett

David Holmes
Crystal Hornseth
Kayla Horst
Jeff Illk
Randi Johnson
John Keathley
Nolan Kehres
Verla King
John Koelsch
Patrick Ladd
Cory Latham
Terri Lawson
Tim Leakey
Bradley Logsdon
Ronald Magana
Mark K Malick
Mackenzzy May
Chris Mercer
Jody Meyers
Roger Michels
Pamela Miller
Travis Mishler
Eric Dr Mitchell
Charles Moore
Eric Moore
Matthew Moser
Jeff Muckenthaler
Zachary Nance
NDCAC National Domestic Communications Assistance Center
Cory Nicolet
Jerry O'Neal
Catherine Ohlemeier
Spenser Olson
Nick Pipkin
Kelsie Pitsenbarger
Damien Podrebarac
George Pratt
Kelly Ralston
Nathan Rankin
Mickey Rantz
Toby Reed
Troy Rhodes

Wally Roberts
Erin Rodriguez
Jeff Rodriguez
Oscar Rodriguez
Tasha Rogers
Zach Rogers
Kenny Roney
Mike Roney
Bill Ross
Ivonne Santa
Aaron Scheve
Eric Seabolt
Kenneth Seabolt
Zach Shafer
Terry Sharp
Kevin Shireman
Sheri Sisco
William Smith
Stephanie Spade
Jena Sparling
Paul Stephens
John Stirling
Jeff Stokes
Doug Stump
Denice Teem
Chris Turner
Jared Underwood
Courtney Vaden
Hayley Valdivia
Dominick Vortherms
Willy Ward
William Warkentine
Steven Waters
Jacob Welsh
Jay Wessel
Joe Wilber
Jason Williams
Jaime Winkel
Kelly Woodward-Ohlstein
Amanda Young
Doug Younger
Ryan Zornes