

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

**THE STATE OF KANSAS, Plaintiff**

**v. Case No. 2021-CR-000340**

**JORDY CORNEJO-CAMPOVERDE, Defendant.**

**FIRST AMENDED 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 2nd day of September, 2017 and the 5th day of September, 2017, in Lyon County, Kansas, Jordy Cornejo-Campoverde, 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 Andrew John Granado, 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; Jordy Cornejo-Campoverde, Samuel Garcia, Jovan Pecina, Alan Alanis, Armando Nunez and Andrew John Granado 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 the 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 Jorge 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, Jordy Cornejo-Campoverde, 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. 2-5402, and against the peace and dignity of the State of Kansas. (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, Jordy Cornejo-Campoverde, 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]

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

That on or between the 2<sup>nd</sup> day of September, 2017 and the 5th day of September, 2017, in Lyon County, Kansas, Jordy Cornejo-Campoverde, 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 Andrew John Granado, 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 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 himself, 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; Andre 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 Jordy Cornejo-Campoverde and/or Samuel Garcia and/or Jovan Pecina and/or Alan Alanis and/or Armando Nunez and/or Andrew John Granado. 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, Jordy Cornejo-Campoverde, 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, Jordy Cornejo-Campoverde, then and there being present did unlawfully obtain or exert unauthorized control over property 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. 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, Jordy Cornejo-Campoverde, 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**

That on, about, or between the 5th day of September, 2017, and the 3rd day of March, 2018, in Lyon County, Kansas, Jordy Cornejo-Campoverde, 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.a.2.b4.B]

Amy L Aranda 17426

Amy L Aranda, #17426  
First Assistant County Attorney  
Lyon County Courthouse  
Emporia, KS 66801  
Attorney for Plaintiff  
620 341 3263; Fax 620 341 3442  
[aaranda@lyoncounty.org](mailto:aaranda@lyoncounty.org)

SUBSCRIBED AND SWORN TO before me this 18<sup>th</sup> day of November, 2021.



Sue E. Stephens  
Notary Public

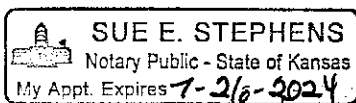
STATE OF KANSAS, COUNTY OF LYON, ss:

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.

Amy L Aranda 17426

Amy L Aranda  
First Assistant County Attorney

SUBSCRIBED AND SWORN TO before me this 18<sup>th</sup> day of November, 2021.



Sue E. Stephens  
Notary Public

**LEO Witnesses:**

**Agha, Jaffar [EPD]**  
**Alwes, Brian [ATF]**  
**Arb, Dan [LYSO]**  
**Arnold, Harley [EPD]**  
**Baker, James [LYSO]**  
**Bauman, Kevin [Anderson Co. Search & Rescue]**  
**Bautel, Courtney [Frontier Forensics]**  
**Bell, Shelby [Frontier Forensics]**  
**Blanton, Karen [KBI SA]**  
**Boyer, Ryan [KBI SSA]**  
**Bradford, Reason [Fire Marshall/EFD]**  
**Brede, David [KBI SSA]**  
**Bridges, James [KBI SAC]**  
**Brinkmeyer, Mick [Anderson Co. Search & Rescue]**  
**Brock, Clint [KBI SA]**  
**Brockman, Jim [LYSO]**  
**Brooks, Tera [Franklin CO SO]**  
**Broyles, Danny [LYSO]**  
**Buck, Samantha [KBI Forensic Scientist]**  
**Buell, Vikki [KBI CIA Unit]**  
**Bundy, Steven [KBI SSA]**  
**Burk, Ronnie [KBI SSA]**  
**Byrd, Jon [Ron Smith & Assoc]**  
**Carr, Justin [LYSO]**  
**Celeste, Anthony [KSFM]**  
**Chavez, Arnold [LYSO Detention Offr]**  
**Clay, Larry [USD 253 Security]**  
**Cole, Amber [KBI CFO]**  
**Cope, Jeff [LYSO]**  
**Crow, Brad [KBI Forensic Scientist]**  
**Dall, Steve [LYSO]**  
**Davis, Kelly [EPD]**  
**Decker, Paul [Anderson Co. Search & Rescue]**  
**Dekat, Nicole [KBI Forensic Scientist]**  
**Delgadillo, Daniel [EPD/KHP]**  
**Delmott, Dennis [LYCA Investigator]**  
**Diaz, Jason [KBI SSA]**  
**Doty, Lane [EPD]**  
**Dougherty, Casey [USSS]**  
**Early, Brandon [LYSO]**  
**Edgecomb, Lonnie [Anderson Co. Search & Rescue]**  
**Evans, Daniel [LYSO]**

**Fell, Jarrod [Lyon Co. Emergency Mgmt.]**  
**Fishburn, Callie [Community Corrections - juvenile probation]**  
**Fisher, Rex [EFD]**  
**Flohrshutz, Tim [FBI]**  
**Fournier, Jemiah [EPD]**  
**Frederickson, Laura [Frontier Forensics investigator]**  
**Garcia, Mackenzie [KBI - Forensic Scientist Firearms & Toolmarks]**  
**Gifford, Jason [LYSO]**  
**Gill, Jarrod [KBI SA]**  
**Gillespie, Steve [KBI SA]**  
**Gladding, Taylor KBI IA Unit**  
**Goldsby, Tyler, KBI SA**  
**Hachmeister, Aaron [KBI SA]**  
**Hayworth, Jacqueline [KBI Forensic Scientist Latents]**  
**Hendrickson, Garland [LYSO]**  
**Hermanson, Arnold DDS [Forensic Odontologist]**  
**Hernandez, Marcial [EPD]**  
**Herrera, Andy [KBI SA]**  
**Hockett, Lance [KDWP]**  
**Holmes, David [EPD]**  
**Hornseth, Crystal [KBI SA]**  
**Horst, Kayla [KBI Forensic Scientist/CSRT]**  
**Illk, Jeff [USD 253 Security]**  
**Johnson, Randi [KBI CIA Unit]**  
**Keathley, FNU [Osceola Co. SO Michigan]**  
**Kehres, Nolan [LYSO]**  
**King, Verla [KBI CIA Unit]**  
**Koelsh, John [LYSO]**  
**Ladd, Patrick [Topeka PD]**  
**Latham, Cory [KBI SSA]**  
**Lawson, Terri [Coffey Co. dive team]**  
**Leakey, Tim [KBI SSA]**  
**Logsdon, Brad [LYSO]**  
**Magana, Ronald [EPD]**  
**Malick, Mark [KBI SSA]**  
**May, Makenzie [LYSO Detention]**  
**Mercer, Chris [KSFM]**  
**Meyers, Jody [LYSO]**  
**Michels, Roger [KBI Forensic Scientist Firearms & Toolmarks]**  
**Miller, Pamela [KBI CIA Unit]**  
**Mishler, Travis [LYSO]**  
**Mitchell, Eric Dr. [ME/Frontier Forensics]**  
**Moore, Chuck [LYSO]**

**Moore, Eric [KBI Forensic Scientist]**  
**Moser, Matthew [KDOR OSI]**  
**Muckenthaler, Jeff [KBI CIA Unit]**  
**Nance, Zachary [LYSO Detention]**  
**National Domestic Communications Assistance Center [NDCAC]**  
**Nicolet, Cory [LYSO]**  
**O'Neal, Jerry [Bulter County Detention Center Intelligence Analyst/records custodian]**  
**Ohlemeier, Cay [LYSO/Community Corrections]**  
**Olson, Spenser [EFD investigator]**  
**Pipkin, Nick [KBI SA]**  
**Pitsenbarger, Kelsie [Frontier Forensics]**  
**Podrebarac, Damien [EPD]**  
**Pratt, George Det. [Oseola Co. SO, Michigan]**  
**Ralston, Kelly [KBI SAC]**  
**Rankin, Nathan [LYSO]**  
**Rantz, Mickey [KBI SA]**  
**Reed, Toby [USMS]**  
**Rhodes, Troy [KBI SSA]**  
**Roberts, Wally [KSFM Chief]**  
**Rodriguez, Erin [Community Corrections juvenile probation]**  
**Rodriguez, Jeff [LYSO]**  
**Rodriguez, Oscar [Rio Grande Detention Ctr]**  
**Rogers, Tasha [Coffey Co. dive team]**  
**Rogers, Zach [Coffey Co. dive team]**  
**Roney, Kenny [Coffey Co dive team]**  
**Roney, Mike [Coffey Co SO/Coffey Co dive team]**  
**Ross, Clinton [LYCA Investigator]**  
**Santa, Ivonne [KBI SA]**  
**Scheve, Aaron [KDWP]**  
**Seabolt, Eric [Anderson Co Search & Rescue]**  
**Seabolt, Kenneth [Anderson Co. Search & Rescue]**  
**Shafer, Zach [LYSO]**  
**Sharp, Terry [KSFM]**  
**Shireman, Kevin [EPD]**  
**Sisco, Sheri KBI Forensic Scientist/CSRT]**  
**Smith, William [KBI SAC]**  
**Spade, Stephanie [KBI SA]**  
**Sparling, Jena [KBI Forensic Scientist]**  
**Stephens, Paul [Anderson Co. Search & Rescue]**  
**Stirling, John [Shawnee PD]**  
**Stokes, Jeff [KBI SA]**  
**Stump, Doug [LYSO]**  
**Teem, Denice M. [Toxicologist NMS Labs]**

**Titus Gifford, Tera [LYSO]**  
**Turner, Chris [KBI ASAC]**  
**Underwood, Jared [KBI SA]**  
**Vaden, Courtney [KBI CIA Unit]**  
**Valdivia, Hayley [KBI Lab Technician]**  
**Vortherms, Dominick [EPD]**  
**Ward, Willy [EFD Investigator]**  
**Warkentine, William [Coffey Co. dive team]**  
**Waters, Steven [ATF]**  
**Welsh, Jacob [LYSO]**  
**Wessel, Jay [KBI Forensic Scientist - Latents]**  
**Wilber, Joe [Anderson Co. Search & Rescue]**  
**Williams, Jason [LYSO]**  
**Winkel, Jaime [KBI Evidence Admin Spec.]**  
**Woodward, Kelly [KBI Forensic Scientist/CSRT]**  
**Young, Amanda [KBI SSA]**  
**Younger, Doug [KBI SAC]**  
**Zornes, Ryan [EFD]**

**Lay Witnesses:**

**Alanis Cornejo, Silvia**  
**Alanis, Alan**  
**Alanis, Erica**  
**Alanis, Guadalupe**  
**Alanis, Lyrissa**  
**Aldrete, Esmerelda**  
**Aldrete, Maria Isabel**  
**Arteaga, Daniel**  
**AT&T, Rec. custodian**  
**Avila, Jesus Sr.**  
**Avila, Maria Virginia**  
**Avila, Marilu**  
**Bahena, Erick**  
**Baker, Antonio**  
**Baray, Enrique**  
**Barrett, Nate**  
**Beadles, Paul**  
**Benson, Jadena**  
**Brewer, Jerica**  
**Caballero, Leslie**  
**Calderon, Karina**  
**Caldwell, Leon**



**Campoverde, Maria**  
**Carson, Shelby**  
**Casey's**  
**Castillo, Jocelyn**  
**Castillo, Jonathan**  
**Cecenas, Osiel**  
**Chaparro, Alexis**  
**Chaparro, Cesar**  
**Chaparro, Miguel**  
**Chaparro, Victor**  
**Coleman, Matt**  
**Community National Bank – surveillance video custodian**  
**Community National Bank records custodian**  
**Consumer Cellular, records custodian**  
**Cornejo-Campoverde, Jordy**  
**Couch, Alex**  
**Cricket Communications, records custodian**  
**D'Angelo, Quentin**  
**De La Luz, Oscar**  
**Dingman, Garrett**  
**Doktor, Alexander**  
**Durler, Lukas**  
**Ellis, Trisha**  
**Emporia Orthodontics, records custodian**  
**Facebook, rec custodian**  
**Flint Hills Learning Center records custodian**  
**Flint Hills Community Health Center, records custodian**  
**Foster, Keith**  
**Fowler, Larry**  
**Fruit, Dan**  
**Garcia Lopez, Isabel**  
**Garcia Nunez, Martina**  
**Garcia, Daniel**  
**Garcia, Joshua**  
**Garcia, Maximo**  
**Garcia, Sammy**  
**Garcia, Sandy**  
**Garcia, Simon**  
**Geifer, Danny**  
**Gerry's Pawn, rep. of**  
**Gomez, Kevin**  
**Gomez, Henry**  
**Google, rep. of**

**Goulden, Karly**  
**Granado, AJ**  
**Granado, Eluterio**  
**Granado, Eluterio III**  
**Granado, Nichole**  
**Granado, Olivia**  
**Guevara, Kevin**  
**Guevara, Maria**  
**Guidino, Miguel**  
**Hamlin, Olivia**  
**Harrison, Cathryn**  
**Hartman, Maryann**  
**Haught, Steven Dr.**  
**Hernandez, Alberto**  
**Hernandez, Alex**  
**Hernandez, Daniel**  
**Hernandez, Danny**  
**Hernandez, Francisco "Kiko" Javier**  
**Hernandez, Roel**  
**Hernandez, Selena**  
**Herrera, Daniel**  
**Herrera, Rebecca**  
**Hills Pet Foods, video surveillance custodian**  
**Hopkins Mfg., records custodian**  
**Hostetler & Associates**  
**Ibarra, Victor**  
**Instagram, records custodian**  
**Jenson, Allyson**  
**Jerez, Carlos**  
**Kirby, Eric**  
**KVOE Radio Stations, rep. of**  
**Landaverde, Bryan**  
**Latta, Terrence**  
**Lemus, Angel**  
**Lyon County Road & Bridge records custodian**  
**Magana, Fabiola**  
**Manzano, Jonathan**  
**Marchand, Kim**  
**Matthews, Trevor**  
**Maynez, Adela**  
**McClellan, Kadon**  
**Meyers, John**  
**Milward, Kenneth**

**Morales-Rose, Carlos**  
**Murillo, Guadalupe**  
**Nonoal, Efigenia**  
**Nonoal, Juan**  
**Nunez, Armando**  
**Padrone, Jennifer**  
**Pahuamba, Melchor**  
**Palomares, Efren**  
**Pecina, Jovan**  
**Pecina, Leticia**  
**Pfantz, Karrie**  
**Price, Alan**  
**Pruitt, Shane**  
**Pruitt, Trinity**  
**Q-Link Wireless, records custodian**  
**Ramirez, Jose**  
**Renteria, Carlos**  
**Renteria, Marilyn**  
**Rethman, Randy**  
**Risley, Carolyn**  
**Roberts Blue Barnett**  
**Robinson, Tony**  
**Rodriguez, Jennifer**  
**Rugel, Diego**  
**Salas, Alonso**  
**Sandoval, Kevin**  
**Sandoval, Wilver**  
**Schuler, Braden**  
**Slater-Figueroa, Jacob**  
**Snapchat, Rec. custodian**  
**Soto, Diveli**  
**Sprint, Rec. custodian**  
**Stevens, Shea**  
**T-Mobile, Rec. custodian**  
**Trujillo, Tomasa**  
**US Cellular, records custodian**  
**USD 253, records custodian**  
**Velazquez, Adilene**  
**Velazquez, Marcos**  
**Velazquez, Nelsy**  
**Velazquez, Omar**  
**Velez, Lloyd**  
**Verizon, rec. custodian**

**Viveros, Adolfo**

**White, Kagen**

**William Allen White, rep of**

**Williams, Elijah**

**Wilson, Taylor**

**Wise, Alan**

**Zapata, Bryan**

**Zepeda, Jesus**