

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

**THE STATE OF KANSAS, Plaintiff**

**v. Case No. 2021-CR-000389**

**ARMANDO NUNEZ, Defendant.**

**SECOND 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**

Dismissed by the State

**Count 2**

Dismissed by the State

**Count 3**

Dismissed by the State

**Count 4 - Aggravated robbery; Inflicts bodily harm**

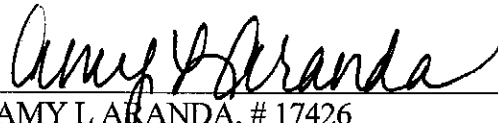
That on or about the 5th day of September, 2017, in Lyon County, Kansas, Armando Nunez, then and there being present did unlawfully, feloniously and knowingly take property, to-wit: US Currency, AK47 rifle, speaker, and/or Nissan Altima vehicle, from the person or presence of Jesus Avila Jr, by force, 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]

**Count 5**

Dismissed by the State

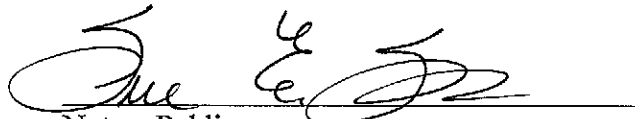
**Count 6 - Interference with LEO; Conceal/alter/destroy evidence**

That on, about, or between the 5th day of September, 2017 and the 3rd day of March, 2018, in Lyon County, Kansas, Armando Nunez, 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]



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.

  
Notary Public

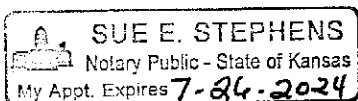
STATE OF KANSAS, COUNTY OF LYON, ss:

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 Amended 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  
First Assistant County Attorney

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

  
Notary Public

WITNESSES:

Jesus Avila Jr  
Alan Alanis  
Erica Alanis  
Guadalupe Alanis  
Lyrissa Dianne Enedina Alanis  
Silvia Alanis-Cornejo  
Esmeralda Aldrete  
Maria Isabel Aldrete  
Daniel Enrique Arteaga  
AT&T Wireless  
Maria Virginia Avila  
Marilyn 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

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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  
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  
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

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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 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  
Jesus Avila Sr  
Alan Price  
Erik Mitchell MD  
Flint Hills Learning Center, Records Custodian  
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 Flohrschutz  
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

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Jason Williams  
Jaime Winkel  
Kelly Woodward-Ohlstein  
Amanda Young  
Doug Younger  
Ryan Zornes