

IN THE EIGHTEENTH JUDICIAL DISTRICT COURT
SEDGWICK COUNTY, KANSAS
CRIMINAL DEPARTMENT

COPY

THE STATE OF KANSAS,
Plaintiff,

v.

GEORGE R. TILLER,
Defendant.

)
)
)
)
)
)
)

Case No.

07CR2112

COMPLAINT/INFORMATION

COMES NOW, Veronica L. Dersch, a duly appointed, qualified, and acting Assistant Attorney General of the State of Kansas, and for and on behalf of the State of Kansas, informs the Court of the following:

COUNT ONE

On or about July 21, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 24 year-old pregnant female when the fetus was determined to be 29 weeks of gestation and viable (file #29, patient ID # 072103JS), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT TWO

On or about July 22, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 14 year-old pregnant female when the fetus was determined to be 26 weeks of gestation and viable (file #30, patient ID # 072203LN), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT THREE

On or about July 8, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 10 year-old pregnant female when the fetus was determined to be 28 weeks of gestation and viable (file #31, patient ID # 070803GG), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT FOUR

On or about August 5, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 15 year-old pregnant female when the fetus was determined to be 26 weeks of gestation and viable (file #38, patient ID # 080503KC), because the defendant

performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT FIVE

On or about August 5, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 15 year-old pregnant female when the fetus was determined to be 28 weeks of gestation and viable (file #39, patient ID # 080503JY), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT SIX

On or about August 12, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 15 year-old pregnant female when the fetus was determined to be 25 weeks of gestation and viable (file #40, patient ID # 081203SP), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT SEVEN

On or about August 25, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 24 year-old pregnant female when the fetus was determined to be 30 weeks of gestation and viable (file #42, patient ID # 082503SK), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT EIGHT

On or about August 26 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 14 year-old pregnant female when the fetus was determined to be 25 weeks of gestation and viable (file #43, patient ID # 082603TK), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT NINE

On or about September 9, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 15 year-old pregnant female when the fetus was determined to

be 25 weeks of gestation and viable (file #44, patient ID # 090903JC), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT TEN

On or about September 9, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 14 year-old pregnant female when the fetus was determined to be 26 weeks of gestation and viable (file #45, patient ID # 090903KL), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT ELEVEN

On or about September 23, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 16 year-old pregnant female when the fetus was determined to be 30 weeks of gestation and viable (file #48, patient ID # 092303EY), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT TWELVE

On or about October 22, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 22 year-old pregnant female when the fetus was determined to be 29 weeks of gestation and viable (file #49, patient ID # 102703AH), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT THIRTEEN

On or about October 27, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 20 year-old pregnant female when the fetus was determined to be 27 weeks of gestation and viable (file #51, patient ID # 102703MO), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT FOURTEEN

On or about September 9, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 19 year-old pregnant female when the fetus was determined to be 29 weeks of gestation and viable (file #52, patient ID # 090903AW), because the defendant

performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT FIFTEEN

On or about November 4, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 13 year-old pregnant female when the fetus was determined to be 25 weeks of gestation and viable (file #53, patient ID # 110403TDS), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT SIXTEEN

On or about November 18, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 15 year-old pregnant female when the fetus was determined to be 25 weeks of gestation and viable (file #54, patient ID # 111803AD), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT SEVENTEEN

On or about November 04, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 15 year-old pregnant female when the fetus was determined to be 25 weeks of gestation and viable (file #55, patient ID # 110403BB), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT EIGHTEEN

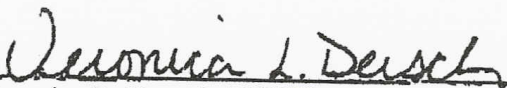
On or about November 4, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 18 year-old pregnant female when the fetus was determined to be 25 weeks of gestation and viable (file #58, patient ID # 110403KH), because the defendant performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

COUNT NINETEEN

On or about November 18, 2003 in the County of Sedgwick, State of Kansas, the defendant, GEORGE R. TILLER, did then and there, contrary to the statutes of the State of Kansas, unlawfully perform or induce an abortion on a 16 year-old pregnant female when the fetus was determined to be 29 weeks of gestation and viable (file #59, patient ID # 111803LR), because the defendant

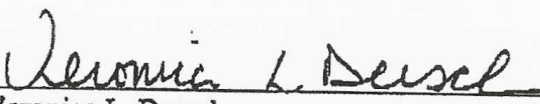
performed or induced the abortion without a documented referral from a physician with whom he was not legally or financially affiliated. Contrary to Kansas Statutes Annotated 65-6703 and 21-4502(1)(a), an Unlawful Late Term Abortion (A class A non-person, misdemeanor).

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

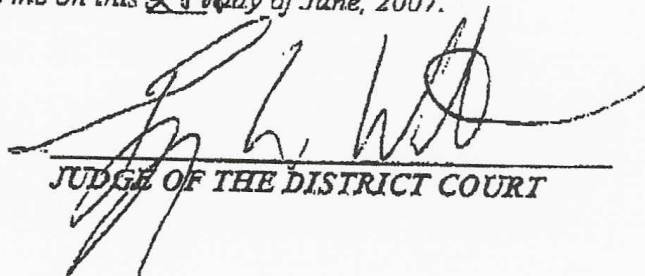

Veronica L. Dersch #20757
Assistant Attorney General

STATE OF KANSAS, SEDGWICK COUNTY, ss:

I, Veronica Dersch, do solemnly swear, to the best of my knowledge and belief, that the matters set forth in the Complaint/Information are true, so help me God.


Veronica L. Dersch
Assistant Attorney General

SUBSCRIBED AND SWORN to before me on this 28th day of June, 2007.


JUDGE OF THE DISTRICT COURT