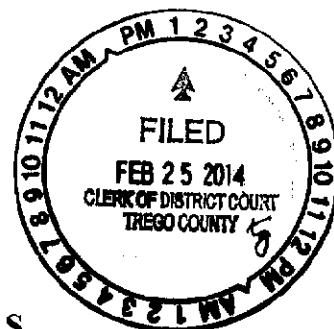


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**IN THE TWENTY-THIRD JUDICIAL DISTRICT  
DISTRICT COURT OF TREGO COUNTY, KANSAS**

STATE OF KANSAS,

Plaintiff,

v.

SCOTT ROBERT BOLLIG,

Defendant.

Case No. 14 CR-15

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**COMPLAINT / INFORMATION**

COMES NOW the State of Kansas, by and through Derek Schmidt, Attorney General, and Jessica G. Domme, Assistant Attorney General, for its Complaint/Information against the Defendant above-named, alleges and states:

**COUNT 1**

**MURDER IN THE FIRST DEGREE  
Off-Grid Person Felony**

That on or about January 26, 2014, in Trego County, and State of Kansas, **Scott Robert Bollig** did, then and there, unlawfully, feloniously, intentionally and with premeditation, kill a human being, to-wit: the unborn child, as defined in K.S.A. 21-5419(a)(2), and amendments thereto, believed to be between 8 to 10 weeks gestation, of Naomi C. Abbott, contrary to and in violation of K.S.A. 21-5402(a)(1), and amendments thereto.

**Penalty sections:** K.S.A. 21-5402(b), and amendments thereto; K.S.A. 21-6806(c), and amendments thereto; K.S.A. 22-3717(b)(1), and amendments thereto; and K.S.A. 21-6620, and amendments thereto.

***OR, IN THE ALTERNATIVE,***

**COUNT 1**

**ATTEMPTED MURDER IN THE FIRST DEGREE**

**Severity Level 1 Person Felony**

That on or about January 26, 2014, in Trego County, and State of Kansas, **Scott Robert Bollig** did, then and there, unlawfully, feloniously, and intentionally commit an overt act, to-wit: putting a crushed form of a medication used to terminate an intrauterine pregnancy on food, toward the perpetration of the crime of Murder in the First Degree, as set forth in K.S.A. 21-5402(a)(1), and amendments thereto, which is the unlawful, felonious, intentional, and premeditated, killing of a human being, to-wit: the unborn child, as defined in K.S.A. 21-5419(a)(2), and amendments thereto, believed to be between 8 to 10 weeks gestation, of Naomi C. Abbott, with the intent to commit such crime, but failed in the perpetration thereof, contrary to and in violation of K.S.A. 21-5301(a) and K.S.A. 21-5402(a)(1), and amendments thereto.

**Penalty sections:** K.S.A. 21-5301(c)(1), and amendments thereto; K.S.A. 21-5402(b), and amendments thereto; K.S.A. 21-6804, and amendments thereto; and K.S.A. 22-3717, and amendments thereto.

**COUNT 2**

**AGGRAVATED BATTERY**

**Severity Level 4 Person Felony**

That on or about January 26, 2014, in Trego County, and State of Kansas, **Scott Robert Bollig** did, then and there, unlawfully, feloniously, and knowingly cause great bodily harm to another person, to-wit: Naomi C. Abbott, contrary to and in violation of K.S.A. 21-5413(b)(1)(A).

**Penalty sections:** K.S.A. 21-5413(g)(2)(A), and amendments thereto; K.S.A. 21-6804, and amendments thereto; and K.S.A. 22-3717, and amendments thereto.

**COUNT 3**

**DISTRIBUTION OF ADULTERATED FOOD**

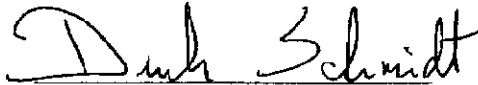
**Class A Non-Person Misdemeanor**

That on or about January 26, 2014, in Trego County, and State of Kansas, **Scott Robert Bollig** did, then and there, unlawfully and intentionally distribute to Naomi C. Abbott a food, to-wit: a pancake, that was adulterated, as defined in K.S.A. 65-664, contrary to and in violation of K.S.A. 65-657(a).

**Penalty sections:** K.S.A. 65-682(d) 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.

Respectfully submitted,  
OFFICE OF THE ATTORNEY GENERAL



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**STATE'S WITNESSES**

KBI SSA Kevin Campbell  
KBI SSA Mark Kendrick  
Larry Mann, KBI  
Naomi C. Abbott  
Jami Jamison  
Ashley Garza  
Tobey Stramel, RN  
Chase Kuchera  
Shannon Herl, RN  
Annie Staats, RN  
Deputy Mesch, Gove Co. Sheriff's Office

Tammy Hutchison, RN  
Dr. Douglas Gruenbacher  
Lyle J. Noordhoek, MD, PA  
Rahn Abbott  
Terry Eberle, Wakeeney Police Chief  
Brad Ricke, Ellis Co. Sheriff's Office  
Richard Hanks, Trego Co. Sheriff  
Allan J. Weber, Gove Co. Sheriff  
Gove County Hospital personnel  
Trego-Wakeeney State Bank personnel  
U.S. Post Office personnel

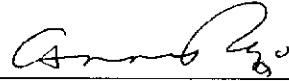
**STATE OF KANSAS, COUNTY OF SHAWNEE, SS:**

I, Jessica G. Domme, being first duly sworn, state that I have read the above and foregoing Complaint/Information and know the contents thereof, and that the same is true in substance and in fact to my best information and belief:



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SUBSCRIBED AND SWORN to before me this 25<sup>th</sup> day of February, 2014.



Notary Public