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	COMPLAINT / INFORMATION	
Defendant.		
GEORGE R. TILLER		
v.	CASE NO. 06 CR	
Plaintiff,		nw-
STATE OF KANSAS,		TOTAL SOMET
20	SEDGWICK COUNTY, KANSAS	1 200 SEC 21 1 P 1: 3
	IN THE DISTRICT COURT	AFF DUCKET NO.

COMES NOW the State of Kansas by Phill Kline, Kansas Attorney General, and for Complaint / Information against the above-named Defendant, alleges and states:

COUNT ONE

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about July 22, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 14 year old pregnant child when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 26 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the pregnant woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, to wit: In file #30, patient ID #072203LN, the defendant wrongfully relied on a diagnosis of Anxiety Disorder NOS or Adjustment Disorder with mixed anxiety and depressed mood, to determine that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman when such diagnoses do not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, in violation of KSA 65-6703.

COUNT TWO

Failure to Report Justifications for Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about and after July 22, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file #30, patient ID #072203LN, state record #005956, on a viable fetus having a gestational age of 22 or more weeks, to wit: 29 weeks of age, did report that the fetus was not viable and therefore did not report the actual determination of fetus viability, nor the reasons for such determinations, nor the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT THREE

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about July 8, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 10 year old pregnant child when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 28 weeks, by failing to determine that (1) the abortion is pecessary to preserve the life of the pregnant woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, to wit: In file #31, patient ID #070803GG, the defendant wrongfully relied on a diagnosis of Major Depressive Disorder, Single Episode, to determine that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman when such diagnosis does not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible

COUNT FOUR

Failure to Report Justifications for Late Term Abertica K.S.A. 45-6703 Class A Non Person Mindenessor

That on or about and other July 8, 2003, is Sedgwick County, State of Kansas, GEORGE R. TELLER rid, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced on abortion, to wit: file 831, potient ID 6070800000, state record 6005970, on a visible foras having a gestational age of 22 or more weeks, to wit: 23 weeks of age, rid report that the firsts was not visible and therefore rid not report the actual distormination of fetus visibility, nor the reasons for such determinations, nor the basis for the determination that the abortion was necessary to preserve the life of the programs wereast or that a continuous of the programs woman in writing to the medical case facility in which the abortion was performed for inclusion in the report of the medical case facility to the secretary of health and environment under K.S.A. 63-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT FIVE

Unlawful Late Term Abortion

K.S.A. 68-6703 Class A Non-Person Misdemesons

That on or about July LS, 2003, in Sedgwick County, State of Karsas, the defendant, GHCMASS is THLESS, did, then and there, contrary to the mistates of the State of Karsas, unlawfully perform or induce or caused to be performed as induced an abortion on a 15 year old program child when the fetus was viable and had a gestational age of 22 weeks or more, to wit 28 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the program woman, or (2) a continuation of the program woman, to wit. In file 832, patient 10 #071503LJ, the defendant wrongfully relied on a diagnosis of Major Depressive Disorder, Single Episode, to determine that a continuation of the programy will cause a substantial and irreversible impairment of a major bodily function of the programs weener when such diagnosis does not establish that a continuation of the programs woman, in violation of ESA 65-6303.

COUNTSIX

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Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdementor

That on or about and after July 15, 2003, in Sodgwick County, State of Kansas, GEDBCIE B. TELLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, ofter performing or inducing or causing to be performed or induced an abortion, to wit: file #32, patient ID #0715033L, state record #005976, as a viable feters having a gestationed age of 22 or more weeks, to wit: 28 weeks of age, did full to report the basis for the determination that the abortion was necessary to preserve the life of the programs woman or that a continuation of the programsy would cause a substantial and irreversible inspairment of a major bodily function of the programs weeks in writing to the medical care facility in which the abortion was perfermed for inclusion in the report of the medical care facility to the secretary of abortion was perfermed for inclusion in the report of the medical care facility to the secretary of abortion and environment under K.S.A. 63-445 and aroundments therete, in violation of K.S.A. 65-8760.

COUNT SEVEN

Untawfel Late Term Abertion

K.S.A. 65-6703 Class A Non Person Mindementor

That on or about November 18, 2003, in Sodgwick County, State of Korsas, the defendant, GEORGE R. TELLER, did, then and there, contrary to the stantant of the State of Kassas, unfan fully perform at induce of personal to be partformed or induced an abortion on a 16 year old progrant child when the fetter was viable and bad a gentational age of 22 weeks or more, to wit: 29 weeks, by fulling to determine that (1) the abortion is accessary to preserve the life of the progrant weeks; or (2) a continuation of the progrant weeks to wit: In the 6% and inseversible impairment of a major bodily function of the progrant weeks, to wit: In the 6% and Disorder, Single Episode, to determine that a continuation of the progrant woman when substantial and irreversible impairment of a major bodily function of the progrant woman when each diagnosis does not catablish that a continuation of the progrant woman, in violation of KSA 65-6703.

COUNT EIGHT

KS.A. 65-6703

Failure to Report Justifications for Late Term Abortion

Class A Non Person Misdemeanor

That on or about and after November 18, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or eausing to be performed or induced an abortion, to wit: file #59, patient ID #111803LR, state record #010373, on a viable fetus having a gestational age of 22 or more weeks, to wit: 29 weeks of age, did fail to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT NINE

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about July 30, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 19 year old pregnant woman when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 27 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the pregnant woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, to wit: In file #33, patient ID #073003CS, the defendant wrongfully relied on a diagnosis of Major Depressive Disorder, Single Episode, to determine that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman when such diagnosis does not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, in violation of KSA 65-6703.

COUNT TEN

Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about and after July 30, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas,

unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file #33, patient ID #073003CS, state record #005988, on a viable fetus having a gestational age of 22 or more weeks, to wit: 27 weeks of age, did report that the fetus was not viable and therefore did not report the actual determination of fetus viability, nor the reasons for such determinations, nor the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT ELEVEN

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about August 19, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 22 year old pregnant woman when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 31 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the pregnant woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, to wit: In file #37, patient ID #081903EW, the defendant wrongfully relied on a diagnosis of Major Depressive Disorder, Single Episode, to determine that a continuation of the pregnant woman when such diagnosis does not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, in violation of KSA 65-6703.

COUNT TWELVE

Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about and after August 19, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file #37, patient ID #081903EW, state record #006402, on a viable fetus having a gestational age of 22 or more weeks, to wit: 31 weeks of age, did fail to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-

COUNT THIRTEEN

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about August 5, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 15 year old pregnant child when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 26 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the pregnant woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, to wit: In file #38, patient ID #080503KC, the defendant wrongfully relied on a diagnosis of Major Depressive Disorder, Single Episode, to determine that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman when such diagnosis does not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible

COUNT FOURTEEN

Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdemeanor

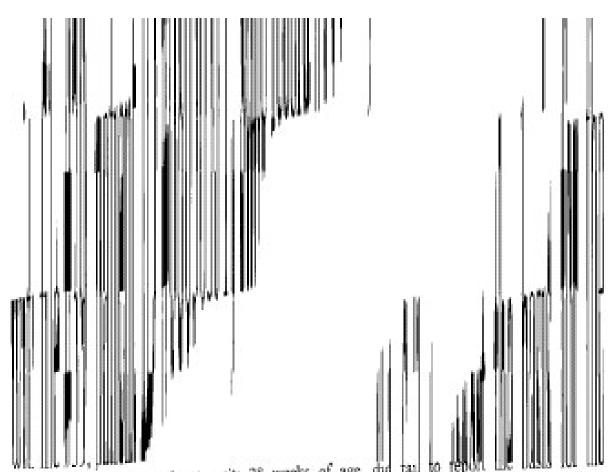
That on or about and after August 5, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file #38, patient ID #080503KC, state record #006408, on a viable fetus having a gestational age of 22 or more weeks, to wit: 26 weeks of age, did fail to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT FIFTEEN

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about August 5, 2003, in Sedgwick County, State of Kansas, the defendant, GEORGE R. TILLER, did, then and there, contrary to the statutes of the State of Kansas,



age of 22 or more weeks, to wit: 28 weeks of age, did tail to fepon life basis 101 till determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT SEVENTEEN

Unlawful Late Term Abertion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about August 12, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 15 year old unlawfully perform or induce or caused to be performed or induced an abortion on a 15 year old unlawfully perform or induce or caused to be performed or induced an abortion on a 15 year old unlawfully perform or induce or caused to be performed or induced an abortion on a 15 year old unlawfully regiment woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and Episode, to determine that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman when such diagnosis irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible does not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, in violation of KSA 65-6703.

COUNT EIGHTEEN

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Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about and after August 12, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file #40, patient ID #081203SP, state record #006591, on a viable fetus having a gestational age of 22 or more weeks, to wit: 25 weeks of age, did fail to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT NINETEEN

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about August 19, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 15 year old pregnant child when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 26 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the pregnant woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, to wit: In file #41, patient ID #081903AG, the defendant wrongfully relied on a diagnosis of Acute Stress Disorder, to determine that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman when such diagnosis does not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, in violation of KSA 65-6703.

COUNT TWENTY

Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about and after August 19, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file #41, patient ID #081903AG, state record #006598, on a viable fetus having a gestational

age of 22 or more weeks, to wit: 26 weeks of age, did fail to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT TWENTY ONE

age of 22 or more weeks, to wit: 26 weeks of age, did fail to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT TWENTY ONE

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about November 4, 2003, in Sedgwick County, 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 or caused to be performed or induced an abortion on a 15 year old pregnant child when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 25 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the pregnant woman; or (2) a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, to wit: In file #55, patient ID #110403BB, the defendant wrongfully relied on a diagnosis of Major Depressive Disorder, Single Episode, to determine that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman when such diagnosis does not establish that a continuation of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnancy will cause a substantial and irreversible impairment of a major bodily function of the pregnant woman, in violation of KSA 65-6703.

COUNT TWENTY TWO

Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about and after November 4, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file #55, patient ID #110403BB, state record #010134, on a viable fetus having a gestational age of 22 or more weeks, to wit: 25 weeks of age, did fail to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and irreversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT TWENTY THREE

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Colowful Late Torm Abertion

K.S.A. 65-6703 Class A Non Person Mindentonov

That on or about August 26, 2003, in Serigwick County, State of Karman, the defendant, GEORGE B. TILLER, did, then and there, contrary to the statutes of the State of Karman, unlawfully perform or induce or caused to be performed or induced as abortion on a 14 year old program child when the fetus was viable and had a gestational age of 22 weeks or more, to wit: 25 weeks, by failing to determine that (1) the abortion is necessary to preserve the life of the program worsan; or (2) a continuation of the program; will cause a substantial and irreversible impairment of a major bodily function of the program; worsan, to wit: In file 643, patient ID \$082600TK, the defendant wrongfully relied on a diagnosis of Acute Stress Disorder, to determine that a continuation of the program; will cause a substantial and irreversible impairment of a major bodily function of the program; worsan when each diagnosis does not establish that a continuation of the program; will cause a substantial and irreversible impairment of a major bodily function of the program; worsan when each diagnosis does not establish that a continuation of the program; will cause a substantial and irreversible impairment of a major bodily function of the program; worsan, in violation of KSA 65-6703.

COUNT TWENTY POUR

Failure to Report Justifications for Late Term Abortion K.S.A. 68-6703 Class A Non Person Misdomeaner

That on or about and after August 26, 2003, in Sedgwick County, State of Kansas, GEORGE R. TILLER did, then and there, contrary to the statutes of the State of Kansas, unlawfally, after performing or inducing or causing to be performed or induced an abortion, to wit: file 843, patient ID 8082609TK, state record 6006604, on a viable fotas having a gritational age of 22 or more weeks, to wit: 25 weeks of ego, did fall to report the basis for the determination that the abortion was necessary to preserve the life of the pregnant woman or that a continuation of the pregnancy would cause a substantial and inversible impairment of a major bodily function of the pregnant woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and servinorment under K.S.A. 65-445 and arrendments thereto, in violation of K.S.A. 63-6703.

COUNT TWENTY FIVE

Unlawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about September 9, 2003, in Sofigwick County, 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 or caused to be performed or induced on abortion on a 15 year old program child when the fotos was viable and high a gestational age of 22 weeks or more, to wit: 25 weeks, by falling to determine that (1) the abortion is necessary to preserve the life of the

program woman; or (2) a continuation of the program woman, to wir. In file 846, patient illustration of the program woman, to wir. In file 846, patient illustration of the program woman, to wir. In file 846, patient illustration of the program woman will come a substantial and irreversible impairment of a major bodily function of the program woman when each chagnesis does not establish that a continuation of the program will cause a substantial and irreversible impairment of a major bodily function of the program woman when each chagnesis does not establish that a continuation of the program woman, in violation of KSA 65-6703.

COUNT IWENTY SIX

Failure to Report Justifications for Late Term Abortion K.S.A. 65-6709 Chris A Non Person Misdementor

That on or about and after September 9, 2003, in Sedgwick County, State of Kansas, GEORGE R. TELLER did, then and there, contrary to the statutes of the State of Kansas, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file 944, perion ID 20909030C, state record 2008236, on a viable fetus having a gonutional age of 22 or more weeks, to wit: 25 weeks of age, did thil to report the basis for the determination that the abortion was necessary to presures the life of the programm woman or that a continuation of the programmy would cause a substantial and incoverable impairment of a analog bookly function of the programm woman in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT TWENTY SEVEN

Uniawful Late Term Abortion

K.S.A. 65-6703 Class A Non Person Missioneaner

That an or about November 4, 2009, in Sadgwick County, State of Kansas, the defendant, GHORGE R. TILLER, did, then and these, contrary to the statutes of the State of Kansas, unlawfully perform or induce or caused to be performed or induced an abertion et a 18 year old program; woman when the fetus was visible and had a gestational age of 22 weeks or more, to wit 25 weeks, by failing to determine that (1) the abortion is accounty to preserve the life of the program woman; or (2) a continuation of the programs will cause a substantial and insversible appairment of a stajor bodily function of the programs woman, to wit: In file 936, patient ID #110403KH, the defendant wrongfully solid as a diagrams of Anxiety Disorder NOS or Acute Stress Disorder, to determine that a continuation of the programs woman when such diagnoses do not establish that a continuation of the programsy will cause a substantial and investible impairment of a major bodily function of the programs woman when such diagnoses do not establish that a continuation of the programs will cause a substantial and investible impairment of a major bodily function of the programs, in violation of KSA 65-6700.

COUNT TWENTY EIGHT

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Failure to Report Justifications for Late Term Abortion

K.S.A. 65-6703 Class A Non Person Missionessor

That on or about and ofter November 4, 2003, in Sedgwick County, State of Kansas, GBORGE R. TILLER did, then and there, contrary to the statetes of the State of Kansas, unlawfully, after performing or inducing or easting to be performed or induced an abortion, to wit file #5%, patient ID #010400KH, state record #000050, on a viable first having a postational age of 22 or more weeks, to wit 25 weeks of age, did full to report the basis for the determination that the abortion was necessary to preserve the life of the program worms or that a continuation of the program; would cause a substantial and irreversible impairment of a major bodily function of the program worms in writing to the medical care facility in which the abortion was performed for inclusion in the report of the medical care facility to the scentary of health and onvironment under K.S.A. 65-445 and amendments thereto, in violation of K.S.A. 65-6703.

COUNT TWENTY NINE

Enlawful Late Term Aburtion

K.S.A. 68-6703 Class A Non Person Misdemeanor

That on or about November 4, 2003, in Sudgwick County, State of Kimsus, the defendant, GEORGE R. TULLER, did, then and there, contrary to the statute of the State of Kimsus, unlawfully perform or induce or caused to be performed as induced an abortion on a 15 year old program woman when the fotos was viable and had a gestational age of 22 weeks or more, to wit: 25 weeks, by failing to determine that (1) the abortion is reconstry to preserve the life of the program woman; or (2) a continuation of the programs woman, to wit. In the AS3, patient ID #11040STDS, the defendant wrongfully relied on no catabilished diagnosis, to determine that a continuation of the programs will cause a substantial and importable impairment of a major bodily function of the program woman when such diagnoses do not establish that a continuation of the programs will cause a substantial and irreversible impairment of a major bodily function of the program woman when such diagnoses do not establish that a continuation of the programs will cause a substantial and irreversible impairment of a major bodily function of the program; in violation of ESA 65-6703.

COUNT THURTY.

Failure to Report Justifications for Late Term Abortion K.S.A. 65-6703 Class A Non Person Misdemeanor

That on or about and after November 4, 2003, in Sadgwick County, State of Kames, GEORGE R. TILLER did, then and there, courtary to the statutes of the State of Kames, unlawfully, after performing or inducing or causing to be performed or induced an abortion, to wit: file 053, patient ID 0110403TDS, state record 0000417, on a viable fetus having a pertotional age of 22 or record weeks, to wit 25 weeks of age, did report that the fetus wax not

visible and therefore did not report the actual determination of fitus visibility, nor the seasons for such determinations, nor the basis for the determination that the abortion was necessary to preserve the life of the programs woman or that a continuation of the programs would cause a substantial and interversible impairment of a major bodily function of the programs woman in writing to the medical care facility in which the abortion was performed for inclusion in the seport of the medical care facility to the secretary of health and environment under K.S.A. 65-445 and arrendments thereto, in violation of K.S.A. 65-6703.

PHILL KLINE

KANSAS ATTORNEY GENERAL

STEPHEN D. MAXWELL

SENIOR ASSISTANT ATTORNEY GENERAL

STATE OF KANSAS, COUNTY OF SEDGWICK, 86:

I, Phill Kline, do selemaly swear, to the high of my knowledge and belief, that the mattern set forth in the Complaint / Information are 1945, as help and set.

PHILL KLINE

KANSAS ATTORNEY GENERAL

SUBSCRIBED AND SWORN to belong me, this ,

New of Denember, 2006.

Judge of the District Court

Witnesses

Thomas Williams
Jased Rand
Dr. Ann Kristin Neuhaus
Stove Coveningh
Clork of the District Count—3rd Judicial District
Dr. Paul McHugh
Dr. Lume Hallips
Locus James.
Gina Bowes

Scaled documents attached in support of Complaint/Information:

- 1) Adilidavit of Dr. Paul R. Melitagh, M.D. Johns Hapkins Medical Center
- 2) Affidavk of Special Agent in Charge Thomas D. Williams
- 3) Transcript of sworn statement by Dr. Ann Kristin Neubaus, M.D.
- 4) Transcript of aworn statement by Dr. Lome Phillips, KDHE
- 5) Copies of 15 KDHE report forms
- 6) Copies of 15 medical files, patient identification reducted