

COMPLAINT/INFORMATION

STATE OF KANSAS

COUNTY OF RENO

VS.

RYAN JAMES STOECKLEIN

Before Judge of the District Court
Reno County, Kansas, in said County
and State.

COMPLAINT/INFORMATION

I, Kimberly A Rodebaugh, the undersigned Senior Assistant District Attorney, in the name and by the authority and on behalf of the State of Kansas, comes now here and give the Court to understand and be informed:

COUNT I

SEXUAL EXPLOITATION OF A CHILD

K.S.A.: 21-5510(a)(1) & (b)(1)(B)

Felony; a severity Level 3 Felony

That on or between January 1 and March 24, 2025, in Reno County, Kansas, **RYAN JAMES STOECKLEIN** promoted a performance that included sexually explicit conduct of a child under 18 years of age, to wit: JMFG, DOB (xx/xx/2007), **a severity level 3 person felony.**

COUNT II

ATTEMPTED UNLAWFUL SEXUAL RELATIONS

K.S.A.: 21-5512(a)(9) & (b)(2) and 21-5504

Felony; a severity Level 7 Felony

That on or between January 1 and March 24, 2025, in Reno County, Kansas, **RYAN JAMES STOECKLEIN** did unlawfully and feloniously attempt to engage in consensual sexual intercourse and lewd fondling or touching with a person who was a student enrolled at the school where the offender was employed, to wit: Nickerson High School, who was 16 or more years of age, to-wit: JMFG (DOB: xx/xx/2007), and who was not married to the offender, while the offender was a teacher or other person in a position of authority, by completing an overt act towards the perpetration of the crime, done by a person who intended to commit such crime but failed in the perpetration thereof or was prevented or intercepted in executing such crime, **a severity level 7 person felony.**

WITNESSES

JMFG

Detective K Berger - Reno County Sheriff Office

Evidence Custodian - RNSO

Dustin Groth

Staci Michelle Groth

Nickerson High School

Hannah Stoecklein

STATE OF KANSAS, COUNTY OF RENO, ss:

I, KIMBERLY A RODEBAUGH, being of lawful age, duly sworn on oath, say that I am the Senior Assistant District Attorney, in the State of Kansas and that I am informed and verily believe that the facts and allegations set forth in the within information are true, so help me God.



Kimberly A Rodebaugh, SC#15654

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