

**State of Kansas**  
**Alcoholic Beverage Control Division**  
**Arrest/Detention Probable Cause Affidavit**  
**Douglas County, Kansas District Court**

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CASE NUMBER: DC-2026-CR-000505  
SEALED

**Reference Case # 2026-310225**

I, Nicholas Grey, Alcohol Beverage Control Agent with Kansas Department of Revenue, being of lawful age and first duly sworn upon my oath, state:

I believe the following offenses have been committed:

**KSA 21-5302- Conspiracy to Commit Minor in Possession (KSA 41-727) (x4)**

The following person is alleged to have committed said offenses:

**Hunter J Noravong**

**A/M** [REDACTED]

**SSN:** [REDACTED]

**Phone Number:** [REDACTED]

**This affidavit is based on the following facts:**

On 01/20/2026 Kansas Alcoholic Beverage Control (ABC) Chief Bart Branyon contacted Lawrence Police Department (LPD) Chief Rich Lockhart in reference to a felonious shooting that had occurred on 01/17/2026 at The Hawk, which is located at 1340, 1342, 1346 #C Ohio Street Lawrence, Douglas County, Kansas 66044. The Hawk possesses a Kansas ABC liquor license as an on-premises drinking establishment under the owner name of Jayhawk Café Inc. This shooting resulted in the death of 18-year-old [REDACTED] (DOB: [REDACTED]) and serious injury to 16-year-old [REDACTED] (DOB: [REDACTED]). Chief Lockhart provided points of contact (POC) for the LPD investigation. Chief Branyon authorized an ABC Operation Bloodhound investigation to determine how underage youth came to be present in a drinking establishment leading up to, and at the time of, the shooting.

On 01/26/2026 at approximately 1146 hours, Investigator Weslie Clark, of the ABC talked with Lt. Unruh, of the Lawrence Police Department, and told him about the ABC Operation Bloodhound program. Lt. Unruh advised they would like us to wait until the preliminary trial was complete before talking with anyone involved. Lt. Unruh advised that there was a group of individuals under 21 years of age who sneaked into The Hawk through an unmanned side door. They were let in by an unknown patron. Lt. Unruh advised that an employee caught them and made them leave. Lt. Unruh advised that the group came back to The Hawk wearing plastic single-use wristbands consistent with those used by the bar to reflect that the wearer was over 21 years of age and were allowed in. Lt. Unruh advised that the bar staff told the group that the bar was closing and they had to leave. Lt. Unruh advised that a fight ensued. Lt. Unruh advised that one of the individuals pulled a gun and was escorted out of the bar. While outside on the patio, a second individual pulled a gun and fired into the crowd, striking [REDACTED] and [REDACTED].

On 01/31/2026, I, Enforcement Agent Nick Grey, of the Kansas Alcoholic Beverage Control, and Investigator Clark met with LPD Lt. Unruh and Det. MT Brown. Det Brown showed us sections of the videos obtained from video surveillance cameras on the premises of The Hawk.

On 02/02/2026 at 1124 hours, Investigator Clark and I met with [REDACTED] (The Hawk owner) at The Hawk, 1340 Ohio St, Lawrence Kansas, 66044. [REDACTED] showed us the videos of the incident at The Hawk. We reviewed the footage from The Hawk, and the surveillance cameras provided footage of the east and south entrances, the bar, the dance floor, and the patio. They also covered 14th St to the west and the front patio and sidewalk. Investigator Clark was also able to review footage from a nearby elevated pole camera utilized by the Kansas University Police Department (KUPD) that covered the alley to the west where the group bought wristbands.

Using the combined camera systems, Investigator Clark presented the following timeline of actions:

At approximately 2249 hours on 01/16/2026, 9 individuals, males, (one of the males was wearing an orange sweat suit), show up on the cameras and talk to the staff in front of The Hawk, trying to get in. They were turned away.

2300 hours, the group go to the door off 14th St. and a patron opens the door for them.

2303 hours the group gets escorted out of the bar and were talking with a manager, [REDACTED].

2312 hours the group goes to 14th St and walks east. The suspect, [REDACTED] in the orange sweatsuit is present, making the group easier to visually track throughout the movements inside and outside the bar.

2325 hours they walk west on 14th St. up the hill to the alley on the north side of 14th St.

2332 hours a dark colored compact SUV stopped at the alley and the group goes over and talks to the driver of the dark colored SUV. The driver exited the SUV, but the video was not clear enough to identify him. This is captured by the pole camera operated by KU Police Department.

2333 hours the SUV leaves and the group go back to the alley.

2340 hours the group walks from the alley to The Wheel, 507 W.14th St, Lawrence Kansas 66044, then walks back to the alley. Video was not at an angle to see if the group entered The Wheel.

2342 hours the group walked between houses across the street from The Hawk.

2343-2345 hours the group entered The Hawk wearing blue wristbands consistent with those used by The Hawk to identify the patron as 21 years of age or older, in the west entrance.

2346 hours the male wearing the orange sweat suit orders an unknown drink in a cup.

01/17/2026 at approximately 0143 hours some of the group, go sit at a booth with a couple of girls.

0145 hours, the group of males start arguing with the staff when asked to leave because the bar was closing.

0146 hours a fight ensues in the bar with the group and staff

0147 hours the male in the orange sweat suit, pulls a black colored semi-auto pistol and the DJ keeps him separated from the group, while escorting him out of the bar.

0148 hours, at the door of the bar, the male in the orange sweat suit puts the gun to the back of the head of [REDACTED], manager, then is pushed outside and the door is closed. An employee escorts the male with the gun off property. As the male in orange sweat suit is leaving, he shoots in the air several times while walking away.

0149 hours, while people are outside on the patio, a black male (later identified as [REDACTED]) from the group wearing tan pants, a black coat black stocking hat, pulls a black semi-auto pistol with an extended magazine and starts shooting into the crowd.

0151 Lawrence Police on scene.

[REDACTED] advised that one of his employees, [REDACTED] (DOB: [REDACTED]), sent a screen shot of an Asian male named Hunter Noravong as a possible suspect selling wristbands to underage youth to illegally gain access to The Hawk. The wristbands would normally be affixed by designated bar workers verifying that the customer was 21 or older in age. She sent it to fellow employee, [REDACTED] who then forwarded it to [REDACTED].

██████ told ██████ that she saw a profile on Snapchat "hit me up for wristbands to the hawk". ██████ advised that the post was by ██████ and advised the one of the managers at The Hawk told her that ██████ was Hunter's girlfriend. ██████ advised that she heard it was an Asian male selling wristbands, so she started digging and found Hunter Noravong on Instagram.

On 02/06/2026 at approximately 1458 hours Investigator Clark contacted Captain (Capt.) Jack Campbell Jr of the KU Police Department (Dept.) for information on Hunter Noravong and ██████, who was named as possibly being Hunter's girlfriend. Capt. Campbell forwarded my request to Sgt. Todd Carpenter, KU Police Dept, who provided the information on Hunter Noravong. Sgt Carpenter provided an address for Hunter on campus of ██████ and a home address of ██████. Sgt Carpenter also provided vehicle information for Hunter, which was a maroon 2018 Acura RDX bearing Kansas tag 7123AFP. The 2018 Acura RDX is a compact SUV consistent in shape with the SUV Investigator Clark saw in the surveillance video.

On 02/11/2026 at approximately 0630 hours, Investigator Clark and I met with ABC Supervisory Agent R. Johnston at ██████ on KU Campus. We responded to the apartment but were told by the resident that Hunter did not reside there. At 0730 hours we responded to the ██████ address and contacted Hunter's parents. Upon arrival, a maroon Acura RDX bearing Kansas Tag 7123AFP was observed parked in the driveway. Hunter's parents advised that Hunter lives in an apartment in Lawrence but would not provide an address but did confirm we had the correct phone number. I called Hunter and left a message, but Hunter never returned the call. Later that day, Investigator Clark was contacted by Michael Hunter, via voicemail, who presented himself as an attorney for Hunter Noravong.

On 02/12/2026 at approximately 1510 hours, Investigator Clark returned the call to Michael Hunter and left a message to meet with him and Hunter. Michael called back and asked some questions but never would set up a meeting.

On 02/12/2026 at 1300 hours, Investigator Clark contacted ██████ (DOB: ██████) via telephone, who advised that he had gotten word that someone was selling wristbands to underage individuals to gain entry into The Hawk. ██████ advised that he called around to several people in his old fraternity. ██████ advised that they gave him the name of Hunter and that Hunter is an Asian male, but they had never met him. ██████ advised that he showed the photo of Hunter to ██████, manager of The Hawk.

On 02/12/2026 at approximately 1545 hours, Investigator Clark contacted ██████ (DOB: ██████) who advised that he did not see the photo of Hunter that ██████ had but saw Hunter selling wristbands for people to get into The Hawk last school year.

On 02/19/2026 at approximately 1538 hours, Investigator Clark called ██████, mother of ██████, and left a message for her to call back. ██████ is a 16-year-old and was a member of the group who purchased the wristbands to get into The Hawk and was subsequently shot and seriously injured during the shooting that occurred on 01/17/2026 at The Hawk.

On 03/18/2026, at approximately 1722 hours Investigator Clark called ██████ again and made contact. Investigator Clark advised ██████ that he had talked to her attorney and he was okay with him talking to ██████. ██████ said that she had also talked to him and they set up an appointment for 03/23/2026 at 1400 hours.

On 03/23/2026 at 1400 hours, Investigator Clark and I responded to ██████ and contacted ██████. When we entered the residence, ██████ and ██████, mother, were sitting on the couch. ██████ advised it was okay for ██████ to be present, and she is a close friend. Investigator Clark spoke with ██████ and he confirmed that he had purchased a bar entrance wristband from a male subject in a vehicle the night of the shooting.

Investigator Clark presented a photo lineup to [REDACTED]. The photo lineup was prepared by the KDOR Office of Special Investigations (OSI). The lineup utilized a program designed to use driver's license photographs based on the general description provided of a suspect. The photographs have the same format and there are no marks or indicators that would draw the viewer's gaze to a particular photograph. Among the five driver's license photographs displayed was the Kansas driver's license of Hunter Noravong. Investigator Clark never provided the name Hunter Noravong or a physical description of Hunter to [REDACTED] or anyone else in the home.

Investigator Clark explained the process to [REDACTED] and told him the individual who sold the wristbands may or may not be in the photos. Investigator Clark gave [REDACTED] five (5) business cards and told him to take his time and look at the photos and place a business card over the photos he did not recognize. Investigator Clark asked [REDACTED] if he had any questions before he turned over the photos and [REDACTED] advised that he understood. Investigator Clark turned over the paper and [REDACTED] slowly examined the photos. [REDACTED] covered up the photos one at a time and advised that subject #2 was the one who he had purchased the wristbands from. Hunter Noravong was photo #2. Investigator Clark asked [REDACTED] on a scale from 1-10, 1 being not real sure to 10 being positive without a doubt, how confident are you? [REDACTED] replied "6". Investigator Clark asked [REDACTED] how much he paid for the wristband and he advised \$20.00 cash and the subject told them not to say anything because he "cannot lose my scholarship". Investigator Clark asked [REDACTED] what type of car the individual was driving, and he advised a dark colored small SUV. Investigator Clark asked [REDACTED] how they contacted the individual and he told me that his friend, [REDACTED] would know. Investigator Clark asked [REDACTED] if he knew of anyone else who may be able to identify the individual. [REDACTED] replied that [REDACTED] (DOB: [REDACTED]) could. [REDACTED] was also at the residence but had been upstairs in another room for the entirety of our initial presence at the residence.

Investigator Clark gave [REDACTED] (5) five business cards and explained that the individual may or may not be in the photos and explained to take his time and cover the pictures one at a time with the business cards. Investigator Clark asked [REDACTED] if he understood and he replied yes. At first [REDACTED] looked at the photos and quickly said "I don't see him". Investigator Clark explained that the photos were Driver's License pictures and to look closely. [REDACTED] then looked at the photos and covered them up one at a time until subject #2 was left and he said that it was him. Investigator Clark asked [REDACTED] on a scale from 1-10, 1 being not sure and 10 being positive without a doubt, how confident are you? [REDACTED] replied "6". Hunter Noravong was photo # 2. Investigator Clark asked [REDACTED] if there was anyone else who may be able to identify the subject that sold them the wristbands. [REDACTED] replied that [REDACTED] (DOB: [REDACTED]) would. [REDACTED] was also present at the residence and had been upstairs the whole time up until this point. [REDACTED] said the boys were all on spring break and hanging out at her house. Due to [REDACTED] being 17, Investigator Clark contacted [REDACTED] mother [REDACTED] as a courtesy to let her know he was wanting to speak to her son. Investigator Clark spoke to [REDACTED] on the phone and she agreed for us to conduct an interview with [REDACTED] at their residence the next day when she could be present, but later contacted Investigator Clark back and said she did not want her son involved with any of our investigation.

While speaking with [REDACTED] and [REDACTED], [REDACTED] and [REDACTED] were all at the dining room table looking at their phones. Prior to leaving the residence, Investigator Clark asked [REDACTED] and [REDACTED] if they had any questions and made sure they had his business card. While talking with [REDACTED] and [REDACTED], [REDACTED] and [REDACTED] brought Investigator Clark a phone, unsolicited, and advised that they found the person on Snapchat that sold them the wristbands. The screen on the phone they showed Investigator Clark had a photograph and a name on it, which was a photograph of Hunter Noravong along with his name. [REDACTED] and [REDACTED] said that they were 100 percent sure it was him, referring to Hunter Noravong, without a doubt and that Hunter Noravong was the person that sold them the wristbands that helped them gain entry into The Hawk. Investigator Clark took a photo of their phone showing a photo of Hunter, accompanied by his name.

The visit to the house confirmed three positive identifications by members of the group, from the night of the shooting, who personally were sold wristbands by Hunter Noravong with the intention to help them gain access to a bar in order to purchase, possess or consume alcoholic beverages.

On 04-08-2026 at 1207 hours, Investigator Clark contacted [REDACTED] via [REDACTED] telephone, who advised that he bought a vodka and Redbull drink in a clear plastic cup. [REDACTED] advised that he paid using cash.

On 04/15/2026 at 1624 hours, Instigator Clark met with [REDACTED] at The Hawk. [REDACTED] provided Investigator Clark with a video of the group purchasing and consuming alcohol the night of the incident. [REDACTED] reviewed the video and advised that all members of the underage group had consumed alcoholic beverages inside of The Hawk that night. [REDACTED] advised that the video and receipts demonstrated that [REDACTED] purchased 10 alcoholic well drinks and 3 shots of alcohol. [REDACTED] used Mastercard number ending in [REDACTED] and cash to pay for the alcohol. [REDACTED] advised that [REDACTED] purchased 4 alcoholic well shots and one alcoholic well drink.

Investigator Clark submitted the video for virus scan to Kansas Department of Revenue Information Technology (IT), per KDOR protocol. Investigator Clark is required to submit the video to IT prior to being able to review the video himself on his own computer.

Hunter Noravong is not employed or affiliated with The Hawk in any way and as a result of Hunter selling unauthorized wristbands for The Hawk, four juveniles under the age of 18, who were identified as [REDACTED] (DOB: [REDACTED]), [REDACTED] (DOB: [REDACTED]), [REDACTED] (DOB: [REDACTED]) and [REDACTED] (DOB: [REDACTED]) were able to get into The Hawk which in turn, led to the juveniles access to purchase and or consume alcoholic beverages.

I believe there is probable cause to believe that **Hunter Noravong** has committed the crimes(s) included in the complaint.

I verify under penalty of perjury that the foregoing is true and correct.

Executed on the 24<sup>th</sup> day of April, 2026

Signature: \_\_\_\_\_



Printed/Typed Name: Agent Nicholas Grey #127

Kansas Division of Alcoholic Beverage Control