

IN THE DISTRICT COURT OF THE UNITED STATES OF AMERICA
WITHIN AND FOR THE WESTERN DIVISION OF THE WESTERN DISTRICT OF
MISSOURI AT KANSAS CITY MISSOURI

United States of America, Plaintiff,

vs.

Walter H. McGee, Windell Johnson, L. R. Gilbert, Hazel Johnson and Mrs. L. R. Gilbert,
Defendants.

Before the Honorable Albert L. Reeves, Judge of the United States District Court,
within and for the Western District of Missouri, at Kansas City, Missouri.

COMPLAINT

Now on this, the Second Day of June in the year, 1933, comes Thomas J. Layson, Assistant United States Attorney, within and for the Western District of Missouri, who prosecutes for and on behalf of the United States of America, in said district, and upon his official oath of office states, declares and charges the fact to be, that on the 27th day of May in the year 1933 at 21 West 57th Street, in Kansas City, Jackson County, Missouri, in the Western Division of the Western District of Missouri, and within the jurisdiction of this court, one Walter H. McGee, one Windell Johnson, one L. R. Gilbert, one Hazel Johnson and one Mrs. L. R. Gilbert, then and there each being personally present and acting jointly and each aiding and abetting each other, did then and there with force and arms, unlawfully, wilfully, knowingly, fraudulently and feloniously, and forcibly, and without lawful authority, seize, confine, inveigle, decoy, kidnap, abduct, take and carry away, one Mary McElroy, from her place of residence located at 21 West 57th Street in Kansas City, Jackson County, Missouri, with the fraudulent intent then and there on their part and on the part of each of them to secretly confine the said Mary McElroy against her will and with the fraudulent intent then and there, as aforesaid, of causing H. F. McElroy, the father of Mary McElroy, to pay a certain sum of money, to wit, Thirty Thousand Dollars (\$30,000.00) as ransom and reward for the return and release of the said Mary McElroy, and with the fraudulent intent then and there to cause the said Mary McElroy to be taken and sent out of the State of Missouri.

And the said Thomas J. Layson, Assistant United States Attorney, as aforesaid, upon his oath aforesaid, further charges the fact to be that thereafter, and on the 27th day of

May in the year 1933 at Kansas City, in Jackson County, Missouri, in the Western Division of the Western District of Missouri, and within the jurisdiction of this court, that the said Walter H. McGee, Windell Johnson, L. R. Gilbert, Hazel Johnson and Mrs. L. R. Gilbert, did then and there unlawfully, wilfully, knowingly, fraudulently and feloniously transport and cause to be transported the said Mary McElroy, in interstate commerce; that is from Kansas City, Jackson County, Missouri, to a point in Kansas City Kansas, Wyandotte County, in the State of Kansas, after the said Mary McElroy had been unlawfully seized, confined, decoyed and kidnapped, as aforesaid, with the fraudulent intent then and there of causing the said Mary McElroy to be confined at a point and place in Kansas City, Kansas, in Wyandotte County, in the State of Kansas, and there held for ransom and reward; contrary to the form of the statute in such case made and provided, and against the peace and dignity of the United States of America.

COUNT II

And the said Thomas J. Layson, Assistant United States Attorney, as aforesaid, upon his oaths aforesaid, further states and charges the fact to be that on the 27th day of

May of the year 1933, at Kansas City in Jackson County, Missouri, in the Western Division of the Western District of Missouri, and within the jurisdiction of this court, t at one Walter H. McGee, one Windell Johnson, one L. R. Gilbert, one Hazel Johnson and one Mrs, L. R. Gilbert, with intent then and there to extort from one H. F. McElroy, certain money, and a certain thing of value, towit, the sum of Thirty Thousand Dollars (\$30,000.00), lawful moneys of the United States and of the value of Thirty Thousand Dollars (\$30,000.00), the money and property belonging to the said H. F. McElroy, did then and there unlawfully, wilfully, knowingly, fraudulently and feloniously deposit, and cause to be deposited, in the Post Office of the United States of America in Kansas City, Jackson County, Missouri, for sending, mailing and delivery by the Post Office establishment of the United States, a certain written letter enclosed in a certain envelope, which said envelope with said letter enclosed therein, then and there bore the address of H. F. McElroy, which said address was, and is, in words and figures as follows, towit: "Mr. H. F. McElroy, 21 West 57th Street, Kansas City, Missouri," and which said letter enclosed in said envelope addressed to the said H. F. McElroy as aforesaid, did then and there contain certain threats to injure the person and property of the said H.

F. McElroy, who was then and there the addressee of said letter contained in said envelope, addressed to the said H, F. McElroy, as aforesaid, which said letter was then and there intended by the said Walter H. McGee, Windell Johnson, L. R. Gilbert, Hazel Johnson and Mrs. L. R. Gilbert to be delivered to the said H. F. McElroy by the Post Office establishment of the United States of America, as aforesaid. Contrary to the form of the statute in such ease made and provided, and against the peace and dignity of the United States of America.

Thomas J Layson

ASSISTANT UNITED STATES ATTORNEY with and for the Western District of Missouri

UNITED STATES OF AMERICA WESTERN DISTRICT OF MISSOURI

Comes now Thomas J. Layson, Assistant United States Attorney within and for the Western District of Missouri, and who being first duly sworn upon his oath according to law, upon his said oath states and says that all the facts and statements set forth and contained in the above and foregoing complaint are true and correct.

Thomas J Layson

Subscribed and sworn to before me this, the Second day of June, 1933.

Albert L. Reeves

JUDGE OF THE UNITED STATES DISTRICT COURT WITHIN AND FOR THE
WESTERN DISTRICT OF MISSOURI.

THL/BA