

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

STATE OF OKLAHOMA,)
)
Plaintiff,)
vs.)
)
MICHAEL S. HANSON, JR.)
W/M DOB: 1-1-1980)
SSN: xxx-xx-4467)
)
Defendant.)

Case No. CF-2022-1542

JUN 16 2022

RICK WARREN
COURT CLERK
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SECOND AMENDED INFORMATION

COUNTS I-VIII (1-8):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(2), FELONY

This crime is punishable by not more than 2 years imprisonment or up to 1 year in county jail and a fine up to \$5,000

COUNTS IX-XIX (9-19):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(3), FELONY

This crime is punishable by not more than 5 years imprisonment and a fine up to \$5,000

COUNT XX (20):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(4), FELONY

This crime is punishable by not more than 8 years imprisonment and a fine up to \$10,000

COUNT XXI (21):

EMBEZZLEMENT ~ 21 O.S. §1451(B)(1), MISDEMEANOR

This crime is punishable by not more than 1 year imprisonment in county jail and fine up to \$1,000

COUNT XXII (22):

PATTERN OF CRIMINAL OFFENSES ~ 21 O.S. §425, FELONY

This crime is punishable by not more than 2 years imprisonment or up to 1 year in county jail and/or a fine up to \$25,000

COMES NOW John M. O'Connor, the duly authorized and acting Attorney General of the State of Oklahoma, in the name and by the authority of the State of Oklahoma, and on his official oath gives information as follows:

COUNT I:

That between approximately May, 2021 and September, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in CLEVELAND COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC, to wit:

The Defendant fraudulently appropriated \$2,340.36, belonging to Austin Morrow and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials

to construct a concrete project at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Morrow; and/or to any use or purpose not intended or authorized by Mr. Morrow.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT II:

That between approximately September 2021 and October 2021, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,100, belonging to Arnulfo Garcia and which had been entrusted to the Defendant for the specific purpose as a down payment for the labor and materials to build a concrete retaining wall and metal gate on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Garcia; and/or to any use or purpose not intended or authorized by Mr. Garcia.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT III:

That between approximately December 2021 and January 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,275, belonging to John Brewer and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Brewer; and/or to any use or purpose not intended or authorized by Mr. Brewer.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT IV:

That between approximately March 2021 and April 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,600, belonging to George Werner and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Werner; and/or to any use or purpose not intended or authorized by Mr. Werner.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT V:

That between approximately April 2021 and April 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,725, belonging to Jeremiah Elwell and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Elwell; and/or to any use or purpose not intended or authorized by Mr. Elwell.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT VI:

That between approximately June, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,709, belonging to Bill Demattio and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Demattio; and/or to any use or purpose not intended or authorized by Mr. Demattio.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT VII:

That between approximately July, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$1,715.74, belonging to Rick Wickenkamp and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Wickenkamp; and/or to any use or purpose not intended or authorized by Mr. Wickenkamp.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT VIII:

That between approximately October, 2021 and May, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,350 belonging to Wayne Petree and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a retaining wall at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Petree; and/or to any use or purpose not intended or authorized by Mr. Petree.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT IX:

That between approximately April, 2021 and August, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in GRADY COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$7,800, belonging to Kathy Johnson and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Johnson; and/or to any use or purpose not intended or authorized by Ms. Johnson.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT X:

That between approximately July, 2021 and January, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$4,700, belonging to Austin Waddle and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to complete a concrete patio and sidewalk extension on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Waddle; and/or to any use or purpose not intended or authorized by Mr. Waddle.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XI:

That between approximately July, 2021 and October, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,618, belonging to Carmen Stepp and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a fence at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Stepp; and/or to any use or purpose not intended or authorized by Ms. Stepp.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XII:

That between approximately August, 2021 and September, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in CANADIAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,825, belonging to Matthew Jewell and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to complete a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Jewell; and/or to any use or purpose not intended or authorized by Mr. Jewell.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XIII:

That between approximately April, 2021 and December, 2021, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$5,319, belonging to Mark Jones and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials to build a greenhouse and complete HVAC and concrete work of the same at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Jones; and/or to any use or purpose not intended or authorized by Mr. Jones.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XIV:

That between approximately March, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$2,800, belonging to Robert Barnett and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Barnett; and/or to any use or purpose not intended or authorized by Mr. Barnett.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XV:

That between approximately July, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in LOGAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$6,700.77, belonging to Richard Lane and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence and paint at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Lane; and/or to any use or purpose not intended or authorized by Mr. Lane.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XVI:

That between approximately September, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in LOGAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$3,228.47, belonging to James Larimore and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by

Mr. Larimore; and/or to any use or purpose not intended or authorized by Mr. Larimore.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XVII:

That between approximately September, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in CANADIAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$13,900, belonging to Drew Hendrix and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence and retaining wall at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Hendrix; and/or to any use or purpose not intended or authorized by Mr. Hendrix.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XVIII:

That between approximately September, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$12,927.60, belonging to David Herrig and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence and retaining wall at his residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Herrig; and/or to any use or purpose not intended or authorized by Mr. Herrig.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XIX:

That between approximately December, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in LINCOLN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$4,439.29, belonging to Paula Gladden and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Gladden; and/or to any use or purpose not intended or authorized by Ms. Gladden.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XX:

That between approximately December, 2021 and February, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in CANADIAN COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$52,255.68, belonging to John Anderson and which had been entrusted to the Defendant for the specific purpose as a payment for the labor and materials

to build a fence, concrete pad, sidewalks, and a shop building on his property, to the Defendant's own use and benefit, a purpose not intended or authorized by Mr. Anderson; and/or to any use or purpose not intended or authorized by Mr. Anderson.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

COUNT XXI:

That between approximately November, 2021 and April, 2022, the crime of **EMBEZZLEMENT** was feloniously committed in OKLAHOMA COUNTY, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant fraudulently appropriated \$800.00, belonging to Kathleen Amour and which had been entrusted to the Defendant for the specific purpose for the labor and materials to build a fence at her residence, to the Defendant's own use and benefit, a purpose not intended or authorized by Ms. Amour; and/or to any use or purpose not intended or authorized by Ms. Amour.

Said actions and practices are contrary to the provisions of Section 1451 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.


COUNT XXII:

That between approximately April, 2021 and February, 2022, the crime of **PATTERN OF CRIMINAL OFFENSES IN TWO OR MORE COUNTIES** was feloniously committed in the counties of CANADIAN, GRADY, CLEVELAND, LINCOLN, AND OKLAHOMA, State of Oklahoma, by **MICHAEL HANSON** d/b/a Leaders Construction, LLC., to wit:

The Defendant engaged in a pattern of Embezzlement as alleged in Counts I through XXI as part of the same plan, scheme, or adventure.

Said actions and practices are contrary to the provisions of Section 425 of Title 21 of the Oklahoma Statutes and against the peace and dignity of the State of Oklahoma.

JOHN M. O'CONNOR
ATTORNEY GENERAL OF OKLAHOMA

By: 
Matthew Willoughby, OBA No. 33305
Assistant Attorney General
Consumer Protection Unit
313 N.E. 21st Street
Oklahoma City, Oklahoma 73105
Telephone: (405) 522-3061
Facsimile: (405) 522-0085

WITNESSES ENDORSED FOR THE STATE OF OKLAHOMA

1. **ERIC S. VANGURP**
Oklahoma office of the Attorney General
Consumer Protection Unit
313 N.E. 21st Street
Oklahoma City, OK 73105
2. **KATHY JOHNSON**
972 County Street
Tuttle, OK 73064
3. **AUSTIN MORROW**
11713 Shroyer Drive
Oklahoma City, OK 73170
4. **AUSTIN WADDLE**
Southeast 39th Circle
Oklahoma City, OK 73150
5. **CARMEN STEPP**
14209 Smithhurst Road
Edmond, OK 73013
6. **MATTHEW JEWELL**
10117 NW 139th Terrace
Yukon, OK 73099
7. **ARNULFO GARCIA**
1504 Northeast 9th Street
Oklahoma City, OK 73117
8. **MARK JONES**
12617 Bell Oak Road
Edmond, OK 73013
9. **JOHN BREWER**
3601 NW 176th Street
Edmond, OK 73012
10. **JOHN ANDERSON**
6281 Starry Night
Piedmont, OK 73078
11. **GEORGE WERNER**
1909 Normal Hill
Edmond, OK 73034
12. **ROBERT BARNETT**
5816 N. Terry
Oklahoma City, OK 73111

13. **JEREMIAH ELWELL**
1713 Geeta Road
Edmond, OK 73003
14. **BILL DEMATTIO**
1717 Northcliff Avenue
Norman, OK 73071
15. **RICK WICKENKAMP**
4608 NW 31st Street
Oklahoma City, OK 73122
16. **RICHARD LANE**
2025 Bella Sera Drive
Edmond, OK 73034
17. **JAMES LARIMORE**
2055 Bella Sera Drive
Edmond, OK 73034
18. **DREW HENDRIX**
14113 Timber Ridge Estates Blvd.
Yukon, OK 73099
19. **DAVID HERRIG**
2340 Steeplechase Road
Edmond, OK 73034
20. **KATHLEEN AMOUR**
6628 Woodridge Avenue
Oklahoma City, OK 73132
21. **PAULA GLADDEN**
970726 S. 3430 Road
Chandler, OK 74834
22. **WAYNE PETREE**
10401 East Apple Valley Road
Edmond, Oklahoma 73151
23. **MIDFIRST BANK REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
501 NW Grand Boulevard
Oklahoma City, OK 73118
24. **OKLAHOMA CREDIT UNION REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
15100 N. May
Edmond, OK 73103
25. **ALLEGIANCE CREDIT UNION REPRESENTATIVE AND/OR RECORDS CUSTODIAN**
4235 North Meridian Avenue
Oklahoma City, OK 73112

26. ARVEST BANK REPRESENTATIVE AND/OR RECORDS CUSTODIAN
5000 Rogers Avenue
Ft. Smith, AR 72903

27. TINKER FEDERAL CREDIT UNION REPRESENTATIVE AND/OR RECORDS CUSTODIAN
P.O. Box 4570
Tinker AFB, OK 73145

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY IN DISTRICT COURT
STATE OF OKLAHOMA OKLAHOMA COUNTY**

STATE OF OKLAHOMA,)
)
 Plaintiff,)
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 vs.)
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 MICHAEL S. HANSON, JR.)
 W/M, DOB: 1-1-1980)
 SSN: xxx-xx-4467)
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 Defendant.)

JUN 16 2022
RICK WARREN
COURT CLERK
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Case No. CF-2022-1542

COUNTY OF OKLAHOMA)
) ss.
 STATE OF OKLAHOMA)

SUPPLEMENTAL AFFIDAVIT OF PROBABLE CAUSE

I, State of Oklahoma, Office of the Attorney General (OAG) Agent Eric S. VanGurp, do attest that the following is true and factual to the best of my knowledge with regard to the following information. I am currently employed as an Agent for the Consumer Protection Unit (CPU) of the OAG, since 11-8-2021. I have been a Council on Law Enforcement Education and Training (CLEET) certified Law Enforcement Officer in the State of Oklahoma Since 1998. During the course of my 24-year Law Enforcement career, I have conducted investigations associated with several different types of criminal activities in Federal, State, and local jurisdictions. I am aware of what it takes to establish probable cause and how to present those facts to the court for the issuance of an arrest warrant or detention order for a defendant. This affidavit does not contain all the information from this investigation; however, it contains factual information necessary to establish probable cause that **Michael S. Hanson Jr. d.b.a. Leaders Construction** committed the below listed crimes, which are in violation of Oklahoma law.

In November 2021, the Oklahoma Attorney General’s Office (OAG) Consumer Protection Unit (CPU) began investigating a consumer fraud case involving Michael S. Hanson Jr. (AKA: Mike Hanson) doing business as (d.b.a.) Leaders Construction LLC, OAG Case number CINV-21-0031, after receiving several complaints. Your Affiant was assigned to the case and is currently conducting an investigation. During the investigation, your Affiant has discovered several incidents and victims involving contractor fraud at the hands of Michael Hanson, d.b.a. Leaders Construction LLC. As a result of the investigation, Hanson was charged in the District Court of Oklahoma County with nine (9) counts of Embezzlement 21 O.S. 1451, and one (1) count of Pattern of Criminal Offenses, 21 O.S. 425 (Felony), on 4-6-2022. Following the filing of those charges, an additional twelve (12) victims were identified and filed Consumer Complaints against Michael Hanson d.b.a. Leaders Construction LLC. All twelve (12) additional victims reported similar criminal patterns as the first nine (9) victims of Hanson. The following are the details of those twelve (12) incidents, where Michael Hanson d.b.a. Leaders Construction LLC, embezzled money from the following twelve (12) victims.

1. On 3-15-2021, George Werner, who resides at 1909 Normal Hill, Edmond Oklahoma County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on his property. Werner was required to pay \$1600.00 up front for the project. On 3-15-2021 Werner gave M. Hanson a personal check from his Citizens Bank of Edmond Personal account, Check number 3495, on 3-15-2021, in the amount of \$1600.00, paid to the order

of Mike Hanson, Memo: Fence Deposit, signed by George H. Werner. The bank confirmed that Werner's check was cashed by Hanson on 3-15-2021 after he received the check at the Citizen's Bank of Edmond, located at 1 E 1st Street Edmond, Oklahoma County, Oklahoma 73034. The endorsing signature on the back of the check was consistent with Hanson's signature, which was confirmed on other documents in this investigation. Also, hand-written on the back was "OK/B080617150" and "8/31/23," which is Hanson's Oklahoma Driver's License number and expiration date, and "1/1/80," which is Hanson's date of birth. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Werner's property to either start or complete the project as agreed. Werner made several attempts to contact Hanson with no response. Werner said he eventually had to hire another contractor to complete the project.

2. On 3-29-2021, Robert Barnett, who resides at 5816 N. Terry Avenue Oklahoma City, Oklahoma County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on his property. Barnett was required to pay \$2800.00 up front for the project. On 3-29-2021 Barnett gave Hanson a Cashier's check from Tinker Federal Credit Union (TFCU), Check number 11254287, dated 3-29-2021 in the amount of \$2800.00, paid to the order of Leaders Construction LLC, Memo: Payment in full for backyard fence, endorsed by TFCU Financial Officer, Kathy Kelso. The back of the check showed the Cashier's check was deposited to the "The within named" (Leaders Construction LLC) on 3-30-2021 into a BancFirst branch in Edmond, Oklahoma County, Oklahoma. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Barnett's property to either start or complete the project as agreed. Barnett made several attempts to contact Hanson with no response. Barnett has been unable to hire another contractor to complete the fence project because of the money he lost when he paid Hanson to complete the fence project.
3. On 4-8-2021, Jeremiah Elwell, who resides at 1713 Geeta Road Edmond, Oklahoma County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on his property. Elwell was required to pay \$1725.00 up front for the project. On 4-8-2021, Elwell gave Hanson a check from his personal Tinker Federal Credit Union (TFCU) account, Check number: 1434, on 4-8-2021, paid to the order of Mike Hanson, in the amount of \$1725.00, Memo: Fence, signed by Jeremiah Elwell. The back of the check showed the check was deposited into an Arvest Bank account on 4-8-2021 at Arvest Branch number 0628. This is the Arvest Bank branch located at 1133 N. Bryant Edmond, Oklahoma County, Oklahoma 73035. The endorsement signature on the back was similar to Hanson's signature, which has been confirmed on other items during this investigation. Neither Hanson, nor anyone representing Leaders Construction ever returned to Elwell's property to either start or complete the project as agreed. Elwell made several attempts to contact Hanson with no response. Elwell said he eventually had to hire another contractor to complete the project.
4. On 6-22-2021, Bill Demattio, who resides at 1717 Northcliff Avenue Norman, Cleveland County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on his property. Demattio was required to pay \$1709.00 up front for the project. On 6-22-2021, Demattio gave Hanson a personal check from Demattio's personal Tinker Federal Credit Union (TFCU) account, Check number 1096, on 6-22-2021, paid to the order of Mike Hanson, in the amount of \$1709.00, Memo: Deposit, signed by Demattio. The back of the check showed that it was deposited on 6-24-2021 at Arvest Bank Branch 0605. This branch is located at 1501 W. Edmond Road Edmond, Oklahoma County, Oklahoma. The endorsement signature on the back was similar to Hanson's signature, which has been confirmed on other items during this investigation. Neither Hanson, nor anyone representing Leaders Construction ever returned to Demattio's property to either start or complete the project as agreed. Demattio made several

attempts to contact Hanson with no response. Demattio said he eventually had to complete the fence project himself.

5. On 7-6-2021, Rick Wickenkamp, who resides at 4608 NW 31st Street Oklahoma City, Oklahoma County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on his property. Wickenkamp was required to pay \$1715.74 up front for the project. On 7-6-2021, Wickenkamp gave Hanson a personal check from Municipal Employees Credit Union (ME/CU) from the account of Rick or Laurie Wickenkamp, check number 4511, endorsed to Mike Hanson in the amount of \$1715.74, Memo: 60% of fence job week of July 27,2021, signed by Laurie Wickenkamp. The back of the check showed the check was cashed on 7-6-2021 with a routing number at the ME/CU branch located at 101 N. Walker Oklahoma City, Oklahoma County, Oklahoma. The back of the check also had a signature endorsement that was similar to Hanson's signature, which has been confirmed on other documents in this investigation. Neither Hanson, nor anyone representing Leaders Construction ever returned to Wickenkamp's property to either start or complete the project as agreed. Wickenkamp made several attempts to contact Hanson with no response. Wickenkamp said he eventually had to complete the fence project himself.
6. On 7-16-2021, Richard Lane, who resides at 2025 Bella Sera Drive Edmond, Logan County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence and some painting on his property. Lane paid a total of \$6,700.77 to Hanson for the project. Lane supplied Hanson two different checks. The first check was a personal check from the Bank of Oklahoma, from the account of Richard and Bridgette Lane, Check number 1358, dated 7-16-2021, endorsed to Leaders Construction in the amount of \$4783.00, Memo: Fence 129' Paint and signed by Richard Lane. The back of the check showed it was for deposit only into a BancFirst account on 7-16-2021, which could not be made out from the copy. However, the routing number was identified as 103003632, which was identified as the BancFirst Branch located at 3509 S. Purdue St. Oklahoma City, Oklahoma County, Oklahoma 73179. A second check was given to Hanson by Lane, while at Lane's residence, on or about 9-2-2021. The check was in the amount of \$1917.77. The amount was for a section of fence that Lane shared with his neighbor, James Larimore, who resides at 2055 Bella Sera Drive, Edmond, Logan County, Oklahoma 73034. Neither Hanson, nor anyone representing Leaders Construction ever returned to Lane's property to either start or complete the fence project as agreed. However, a representative of Leaders Construction LLC started the painting project, but never finished it. Lane made several attempts to contact Hanson with no response. Lane said he eventually had to hire another contractor to complete the project.
7. On 9-2-2021, James Larimore, who resides at 2055 Bella Sera Drive Edmond, Logan County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on his property. Larimore was required to pay \$3228.47 up front for the project. On 9-2-2021, Larimore gave M. Hanson a personal check from the Bank of America from the personal account of James W. Larimore and Jilian Larimore. The check was identified as check number 3068, written on 9-2-2021, endorsed to Mike Hanson in the amount of \$3228.47, For: Fence. The back of the check had a signature endorsement that was similar to Hanson's signature as confirmed on other documents reviewed during this investigation. According to the stamp on the back, the check was cashed on 9-2-2021 at the Bank of America located at 333 N. Bryant Edmond, Oklahoma County, Oklahoma 73034. This is the Larimore's Bank. Neither Hanson, nor anyone representing Leaders Construction ever returned to Larimore's property to either start or complete the project as agreed. Larimore made several attempts to contact M. Hanson with no response. Larimore said he eventually had to hire another contractor to complete the project.

8. On 9-11-2021, Drew Hendrix, who resides at 14113 Timber Ridge Estates Boulevard Yukon, Canadian County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence and retaining wall on his property. Hendrix was required to pay \$13,900.00 up front for the project. On 9-11-2021, Hendrix met Hanson at the Lowe's, located at 2400 West Memorial Road, Oklahoma City, Oklahoma County, Oklahoma 73134. During that meeting, Hendrix paid Hanson \$13,900.00 in cash for the contracted project. Hendrix supplied a copy of the bank withdrawal slip and the bank statement showing a \$14,000.00 cash withdrawal from his BancFirst account on 9-11-2021. Neither Hanson, nor anyone representing Leaders Construction ever returned to Hendrix's property to either start or complete the project as agreed. Hendrix made several attempts to contact Hanson with no response. Hendrix said he is in the process of finding another contractor to complete the project.
9. On 9-29-2021, David Herrig, who resides at 2340 Steeplechase Road Edmond, Oklahoma County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence and retaining wall on his property. Herrig was required to pay \$12,927.60 up front for the project. On 9-29-2021, Herrig gave Hanson a personal check from his USAA Bank from the account of Susanne or David Herrig, endorsed to Mike Hanson on 9-29-2021 in the amount of \$12,927.60, For: Retaining Wall and Fence. The back of the check showed it was deposited on 9-30-2021, at an Arvest Bank Branch number 0670, which was identified as the Arvest Bank branch located at 4500 N. Harrison St. Shawnee, Pottawatomie County, Oklahoma. Neither Hanson, nor anyone representing Leaders Construction ever returned to Herrig's property to either start or complete the project as agreed. However, Hanson did deliver a portion of the fencing support rails to the property but never started the project. Hendrix made several attempts to contact Hanson with little or no response. Herrig said he eventually had to hire another contractor to complete the project.
10. On 10-15-2021, Wayne Petree, who resides at 10401 East Apple Valley Road Edmond, Oklahoma County, Oklahoma entered into a verbal and written agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a retaining wall for his pool house on his property. Petree was required to pay \$2350.00 up front for the project. On 10-15-2021, Petree gave Hanson \$2350.00 in cash during a meeting at the Mardel's, located at 3300 S. Boulevard Edmond, Oklahoma County, Oklahoma. Toward the end of October 2021, Hanson had removed some rock and replaced a few pieces of wooden siding on the pool house associated with the project. Following that time, neither Hanson, nor anyone representing Leaders Construction ever returned to Petree's property to complete the project as agreed. Petree made several attempts to contact Hanson with little or no response. Petree said he has not hired another contractor to complete the project.
11. On 11-9-2021, Kathleen Amour, who resides at 6628 Woodridge Avenue, Oklahoma City, Oklahoma County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on her property. Amour was required to pay \$800.00 up front for the project. On 11-9-2021, Amour gave Hanson a personal check from her Bank of Oklahoma Account, Check number 1129, dated 11-9-2021 in the amount of \$800.00, made out to Mike Hanson, Memo: "Down pymt Fence", signed by Joe Amour. The stamp on the back of the check showed the check was cashed at a Bank of Oklahoma Branch, which was later identified as the branch located at 6517 NW Expressway Oklahoma City, Oklahoma County, Oklahoma, on 11/9/2021 at 1:30 p.m. The signature on the back of the check is consistent with Hanson's signature, when compared to other documents reviewed in this case. Neither Mike Hanson, nor anyone representing Leaders Construction ever returned to Amour's property to either start or complete the project as agreed. Amour made several attempts to contact Hanson with no response. Amour said she is in the process of getting another contractor to complete the project.

12. On 12-10-2021, Paula Gladden, who resides at 970726 S. 3430 Road Chandler, Lincoln County, Oklahoma, entered into a verbal agreement for Michael Hanson d.b.a. Leaders Construction LLC, to complete a fence on her property. Gladden was required to pay \$4439.29 up front for the project. On 12-10-2021, Gladden met Hanson at her work, located at the Oklahoma University Health and Science Center 975 NE 10th Street Oklahoma City, Oklahoma County, Oklahoma. During this meeting Gladden said she gave Hanson a check for \$4439.29 for the fencing that Hanson was contracted to install. Gladden supplied a copy of the check which was written from her personal Focus Federal Credit Union account, Check number 6584, dated 12-10-2021 in the amount of \$4,439.29, paid to the order of Hanson, memo: Deposit for fence, signed by Paula Gladden. The back of the check showed the check was cashed at the Focus Federal Credit Union, located at 420 NE 10th Street Oklahoma City, Oklahoma County, Oklahoma, on 12-10-2021. The endorsement signature on the back was similar to Hanson's signature, which has been confirmed on other items during this investigation. Neither Hanson, nor anyone representing Leaders Construction completed the project on Gladden's property. Hanson started the project by removing approximately three quarters of the fence, but Hanson never returned to finish the project. Gladden made several attempts to contact Hanson with no response. Gladden said she cannot afford to hire another contractor, so she will have to complete the project herself.


This investigation has shown that since April 2021 to this present date, Michael Hanson has committed twenty-one (21) counts of Embezzlement against twenty-one (21) different victims. Twelve (12) of those victims are identified in this affidavit with a total amount embezzled equaling \$ 53,895.87.

This brings the total amount Embezzled by Hanson from the twenty-one (21) total victims to \$140,927.51.

Your Affiant believes probable cause exists to show the Defendant committed twelve (12) counts of **Embezzlement in violation of Oklahoma Statute 21 O.S. 1451**. The undersigned asks that this Court issue a finding of fact that there is probable cause to believe that the above-named Defendant committed these crimes and issue a warrant for the arrest of Michael S. Hanson Jr.

Further Affiant sayeth not.

JOHN M. O'CONNOR
OKLAHOMA ATTORNEY GENERAL

By: 
Eric VanGurp, Agent
Consumer Protection Unit

SUBSCRIBED AND SWORN to before me this 16th day of June 2022.


Notary Public

Commission Expires: 12-29-2025
Commission Number: 5011397

